

25 September 2025

## **CEPF position on the new EU Bioeconomy Strategy**

The Confederation of European Forest Owners (CEPF) welcomes the planned arrival of a new EU Bioeconomy Strategy. In the first half of the new EU political cycle, it is a unique opportunity to set Europe's strategic policy directions around the circular, renewable- and forest-based bioeconomy at the heart of the EU policy landscape on competitiveness, strategic autonomy, and resilient ecosystems. It is of paramount importance, and must be politically enabled, that the forest-based value chain can contribute to its full potential for Europe's growth and security, as well as climate change mitigation through all three pillars of sustainability.

### **Decentralised, renewable and competitive bioeconomy**

Europe needs a strong, decentralised and circular forest-based bioeconomy with rural areas at heart. The urgent need to shift away from fossil resources, as well as the new geopolitical reality of Europe calls for solutions which ensure the supply of locally sourced, sustainable and renewable materials for a wide range of economical use. As Europe's global partners are increasing efforts in bioeconomy development, the EU cannot afford to stay behind but has a responsibility to lead at the forefront of a sustainable economic transition. To secure new investments for the EU bioeconomy, a long-term vision and political commitment to develop are much needed.

### **Coherent policy under a harmonized EU definition**

Following up on several positive steps in Council of the EU in the past two years<sup>1234</sup>, European forest owners call for a coherent and simplified EU bioeconomy framework which is built on a harmonised and clear definition of the bioeconomy, incorporating the circular economy approach. The definition developed by the Commission<sup>5</sup> is adequate to consider. As the definition for bioeconomy is wide and varies between policymakers, CEPF underlines that forest-based bioeconomy consists of the whole value chain starting from forest owners and continuing

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<sup>1</sup> April 2023 <https://www.consilium.europa.eu/en/meetings/agrifish/2023/04/25/>

<sup>2</sup> April 2024 <https://www.consilium.europa.eu/en/meetings/agrifish/2024/04/29/>

<sup>3</sup> November 2024 [https://finlandabroad.fi/web/eu/policy-papers/-/asset\\_publisher/KDx1Wy2HoxB2/content/bioeconomy-next-steps-in-the-eu-joined-by-estonia-finland-latvia-lithuania-portugal-and-sweden-on-11-november-2024-2-1/384951](https://finlandabroad.fi/web/eu/policy-papers/-/asset_publisher/KDx1Wy2HoxB2/content/bioeconomy-next-steps-in-the-eu-joined-by-estonia-finland-latvia-lithuania-portugal-and-sweden-on-11-november-2024-2-1/384951)

<sup>4</sup> December 2024 <https://www.consilium.europa.eu/en/meetings/agrifish/2024/12/09-10/>

<sup>5</sup> [https://research-and-innovation.ec.europa.eu/research-area/environment/bioeconomy\\_en](https://research-and-innovation.ec.europa.eu/research-area/environment/bioeconomy_en)

through various forest-based industries, covering all forest-based products. The already existing and highly developed bioeconomy processes around Europe should be well-acknowledged in the EU's future bioeconomy policies.

### **Holistic scope and enhanced market access for forest-based products**

Current forest-based innovations enable the production of a range of wood-based materials – from construction materials, textile fibers and renewable wood-based fuels, to innovative applications as bio-chemicals and bioenergy with carbon capture and storage (BECCS) - all play a key role in substituting fossil fuels and fossil fuel-based materials. Enhancing the market access for products derived from the EU bioeconomy is a prerequisite for a thriving forest-based value chain and must be actively facilitated by EU policies

### **Sustainably managed, resilient European forests for the bioeconomy**

Regarding the biomass availability, as a cornerstone for future bioeconomy, forest owners can and already do contribute to producing sustainable materials while keeping the forests healthy and resilient by enhancing forests long-term growth with active and committed sustainable management practices. The new strategy is an opportunity to maintain and enhance forest owners' motivation to manage their forests actively and sustainably. Forest owners understand that the long-term provision of biomass relies on healthy, resilient forest ecosystems, which is why biodiversity is a core element of active sustainable forest management.

The EU Bioeconomy Strategy must ensure that biodiversity targets are addressed through locally adapted and economically viable practices, which could potentially be rewarded under voluntary, market-based frameworks (such as the nature credit framework). Considerations related to biomass sustainability should build on existing framework (Forest Europe<sup>6</sup>), rules set in national and regional legislations, and forest management certification schemes. This is an opportunity for forest owners to diversify incomes from their forests.

### **Assessment of existing policy impacts before any further sustainability related requirement**

To boost markets for bioeconomy, forest owners oppose any legislation on cascading principle for biomass, as the markets are already allocating forest biomass to most value-added products, taking into account local constraints. The introduction of any new EU legislation on sustainability criteria, should be avoided. In order to ensure policy coherence, and above all, to support the uptake of the large number of legislations originating from the 2019-2024 EU legislative period, European forest owners call for an assessment of sustainability requirements under existing legislations before any new legislative proposals.

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<sup>6</sup> <https://foresteurope.org/about/ministerial-conferences/helsinki/>



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As an example, this assessment is necessary when it comes to the following EU policies: Renewable Energy Directive (RED III), the EU Taxonomy Regulation's corresponding delegated acts on climate change mitigation and climate change adaptation, the Nature Restoration Regulation and the Regulation on deforestation-free Products (EUDR).

### **Recognize the substitution effect of the forest-based value chain**

A focus on forest carbon sinks at the expense of other functions is not a preferred policy option. Balance should be ensured between sink, storage and substitution functions with full recognition of the decisive role of substitution effects in climate change mitigation. Utilizing the benefits of the forest-based bioeconomy to its full extent would also mean acknowledging and taking into account the substitution effects not only for long-lived products but for the full range of products from sustainably managed multifunctional forests. Considering the substitution effect of forest-based products, bioeconomy and climate change mitigation policy instruments should be closely interlinked in the design of new EU climate legislation and the evaluation of existing ones in the current EU political cycle.

### **Conclusions**

To put evidence-based policies into meaningful practices, European forest owners call for a non-excessive, simple and predictable regulatory environment, embracing market-based approaches. Thus, a strong position of forest owners in the forest-based value chain is essential for a well-functioning circular forest-based bioeconomy.