Confederation of European Forest Owners

Brussels, 29 September 2025

CEPF feedback on EU nature credits

European Commission public consultation on Nature Credits Roadmap

The Confederation of European Forest Owners (CEPF) recognises the potential of nature credits in safeguarding biodiversity and creating new income opportunities for forest owners. CEPF emphasises the importance of a clear and implementable framework that is attractive to all market parties. Early forest owners' participation is crucial for the success of the nature credits framework, which must support them in maintaining and increasing biodiversity in European forests. While the Roadmap acknowledges the need for cooperation, CEPF expects this collaboration to extend beyond just the European Board on Agriculture and Food (EBAF), e.g. to the Forest and Forestry Stakeholder Platform, as EBAF is not fully representative of all stakeholder sectors, particularly in the context of forests.

Forest owners already play a key role in implementing voluntary measures to boost biodiversity, and CEPF emphasises the following points to support their participation:

1. Multifunctionality of forests

European forest owners' work is based on the Sustainable Forest Management[1] (SFM) principles. SFM relies on complex, integrated, and long-term decisions that ensure the delivery of multiple functions at the same time. Nature credits should be seen as an added value, not as an approach favouring single objective management. Multifunctionality, with timber production as an integral component, remains the backbone of European forest management. Active forest management is also key in for example climate change adaptation and forest fire prevention – aspects that should be considered in the broad approach of nature credits instead of exclusive focus on biodiversity. Generating revenue from biodiversity and regulating ecosystem services while maintaining timber production allows for diversification that reduces economic risks. A multifunctional approach is therefore key for implementing EU goals such as competitiveness, security of supply of resources, and resilience.

2. Market assessment and voluntary framework

A thorough assessment of demand is essential, and CEPF appreciates that this is acknowledged as a key action in the Roadmap. Developing a successful market takes time, and nature credits should therefore be seen as a supplementary tool to finance nature. Avoiding premature harmonisation, supporting voluntariness, and the continuity of existing efforts must be prioritised, with the EU supporting diverse, voluntary market approaches across Member States. Fair and timely compensation from public funds should be provided when restrictions are imposed. Certified activities must remain eligible for unit generation throughout the contract, even if additional restrictions are later introduced.

3. Sensible approach to offsetting

Offsetting mechanisms can serve as crucial demand generators for viable nature credits markets. If offsetting is to be part of the framework, it should be permitted, regulated, and limited at the level of individual Member States. A uniform EU-level mechanism may not reflect adequately national

[1] Resolution H1 of the Helsinki Ministerial Conference on the Protection of Forests in Europe, 1992, https://foresteurope.org/wp-content/uploads/2022/01/MC_helsinki_resolutionH1.pdf

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circumstances, diverse ecological conditions, and the like-for-like principle. A well-designed mechanism can mobilise private capital for biodiversity and make nature credits an economically viable option for European forest owners.

4. Leakage prevention

Leakage is difficult to control, especially in a global market. For forests, this mainly concerns wood available on the EU market, which may need to be imported from third countries with differing sustainability standards if the nature credit market affects harvesting levels within EU forests. A negative impact on EU production would lead to an income transfer with questionable biodiversity benefits and put the EU wood value chains and its benefits to EU society at risk. Measures to address this could include increased wood mobilisation and an emphasis on nature credits-generating measures that still allow simultaneous wood production.

5. Policy coherence

The nature credit framework must be simple enough to be widely accessible, also for small forest owners, and designed to support bioeconomy. CRCF and nature credits must be kept separate to avoid undermining both markets. A wide variety of biodiversity-enhancing forest management practices need to be included. As such the closer-to-nature forestry approach of the EC is not comprehensive enough to be the sole approach for nature credits in forests. With this context, we question the need for such an additional scheme altogether.

The Confederation of European Forest Owners (CEPF) is the umbrella association of national forest owner organisations in Europe. Representing family forestry in Europe, CEPF promotes the values of sustainable forest management, private property ownership and the economic viability of the forest sector. Based in Brussels, CEPF is a non-profit organisation, representing nearly 16 million forest owners. These are private individuals, families and cooperatives, which take care of approximately 60% of the European forest area.

For further information please visit: http://www.cepf-eu.org/