

## **CEPF feedback on the CRCF afforestation methodology** **Delegated regulation for carbon removals and carbon farming**

The Confederation of European Forest Owners (CEPF) acknowledges the opportunity to give feedback on the carbon farming methodologies. In this feedback we focus specifically on the afforestation methodology, as out of the current methodologies presented, it is of the highest relevance to forest owners.

CEPF welcomes certain changes that have been included to make this framework more realistic and implementable. In particular the specification that all health-related fertilisation is allowed in afforestation projects is valuable for ensuring the inclusion of varyingly poor soils and areas with potential to benefit from afforestation. We also welcome the recognition of natural single-species stands and different forestry practices across Europe as planting densities according to Member State requirements are the standard.

As another positive aspect, we note the additionality testing derogations made to accommodate early movers. However, these derogations should be extended to soil organic carbon monitoring as it will take time for the certification bodies to adjust their sampling methods to the requirements of the methodology. We would also like to express our support for the current approach on tillage, although we note that since a tillage depth of up to 15 cm is not feasible in most afforestation cases, it is to be expected that the exception granted with relevant justification would become more of a rule.

On the other hand, we regret to see no changes in certain aspects where CEPF has been asking for them, since we have not gotten a satisfactory explanation either as to why any changes haven't been made. Firstly, the monitoring period being 10 years longer than the activity period is problematic as it creates disproportionate cost and compliance burdens, especially for small-scale forest owners. Understandably, the dynamics of forest carbon sequestration operate over long time and could not be adequately captured within a period strictly aligned with the phase of practices. However, this monitoring needs to be simplified and proportionate, and another carbon farming methodology should be established for forest management to enable the continued credit generation over the additional monitoring period. Second, the continued requirement for a 20-year absence of tree cover remains overly restrictive. We recommend reducing this period to a more proportionate threshold. The 10% crown cover threshold for sparse tree presence is a reasonable safeguard that should be retained, even under a shorter reference period. Finally, due to unnecessarily restrictive eligibility requirements, the methodology still misses the potential of afforestation of former peat extraction sites.

The current eligibility requirements also add unclear criteria about the reflection of the projected age structure, and the draft methodology does not give any clear references as to what is expected of this in practice. This notion seems expensive and laborious, and for afforestation projects rather pointless as well. In addition to having to possibly make considerable changes to the activity and management plan in the middle of the activity period, the increased work and expenses are due to additional monitoring that would have to be implemented. Growing conditions aren't included in the current monitoring structure, so the implementers cannot be expected to have timely and updating information on them. However, this additional monitoring would also be ineffectual, since most young forests of up to 30 years of age don't typically have a great variety in age structure to even be emulated. This same monitoring and expense problem reflects on the requirement of later species diversification as well. We recommend



removing the projected age structure requirement from the eligibility criteria and recognising it as a co-benefit instead.

For the simplest solution on proving sustainability co-benefits, we recommend the recognition of Sustainable Forest Management<sup>1</sup>, which could for example be proven through well-established forest certification schemes, such as PEFC and FSC. We would also like to question the lack of reasoning in using the EU taxonomy as a cornerstone of sustainability under CRCF. The taxonomy criteria have seen very limited uptake in the forestry field<sup>2</sup>, and these criteria have been made to fit the sustainability of the financial sector, which doesn't automatically make them suitable for such climate-related legislation.

Lastly, we regrettably note that there are no precautions for changing legislations during the activity period. To comply with regulatory additionality, projects should follow the legislation in force at the start of the project. Later changes to national legislation should not disrupt the credit generation, and updates to methodology should be possible without retroactive application. This would make participation more secure and appealing, avoiding the risk of leaving implementers liable for an unprofitable project due to later regulatory changes.

CEPF hopes that the concerns of European forest owners will be heard to ensure an inclusive, appealing, and implementable framework for afforestation under CRCF.

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/>

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<sup>1</sup> 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](https://foresteurope.org/wp-content/uploads/2022/01/MC_helsinki_resolutionH1.pdf)

<sup>2</sup> <https://www.cepf-eu.org/news-media/cepf-feedback-eu-taxonomy-review>