

CEPF Feedback on the European Commission Roadmap

2030 Climate Target Plan

FINAL REPLY

(feedback limited to 4000 characters)

CEPF welcomes the EC initiative to propose an increased climate target for 2030 in line with EU's transition towards climate neutrality by 2050 and believes that it is essential to organise the paths towards reaching this objective. CEPF highlights that EU forests and forest sector are crucial in this respect by playing a key role in meeting growing societal needs and related EU climate, environmental, economic and energy policy objectives.

The Roadmap recognises EU's land use sector, including forests, as a CO₂ net natural sink. This is made possible with the application of Sustainable Forest Management (SFM) which provides major climate benefits, including a great mitigation potential. Continuous management of EU forests in a sustainable and active way will contribute to enhanced absorption of CO₂ from the atmosphere over time.

However, the role of SFM is not limited only to carbon sinks. It allows to provide renewable and climate-friendly raw material for wood products which store carbon and can act as a substitute to fossil-based materials and fuels. The three benefits (sink, storage and substitution) contribute to the reduction of CO₂ emissions release to the atmosphere, while ensuring that forests continue to grow and provide many other services. Hence, they must be considered in the new target's definition and as part of future sectorial policy measures.

To support the achievement of carbon neutrality, the EU needs to strengthen its ambition towards establishing a vital circular bioeconomy. For forests, this needs to be assured in line with SFM, which already today ensures raw material supply thanks to steady growth of the EU forest area while ensuring sustainability. Such developments would also positively contribute to rural areas by providing economic development, jobs, breaking rural depopulation as well as improve EU's competitiveness. We welcome further measures that would promote EU's production and mobilisation of sustainable biomass according to local strengths and needs and would support the mainstreaming of the circular bioeconomy across EU policies.

EU forests need to remain healthy and resilient in the context of adaptation to climate change, so they continue to provide multiple ecosystem services, such as CO₂ sequestration and biodiversity. SFM is adapted to meet these objectives as it creates synergies between climate change mitigation and adaptation needs. Thus, EU's carbon ambition needs to be aligned with the New EU Climate Adaptation Strategy which should provide further knowledge on how to improve forest management adaptation to appropriately respond to climate change.

In our view, the EU 2030 Climate Target should strongly acknowledge the crucial role of SFM, as already implemented, and wood in achieving the 2050 goal in a holistic way encompassing carbon sink, storage and substitution. To this aim, it should establish a firm reference with the EU Forest Strategy post-2020,



which should act as the main policy framework for forest issues in coherence with other EU forest-related initiatives (e.g. Biodiversity Strategy, Circular Economy Action Plan, etc.). When setting the ambition of the 2030 target, one should consider that the implementation of LULUCF regulation has begun recently with its contribution to climate change mitigation and that RED II is not yet transposed into MS legislation. CEPF would like to emphasize that any future EU measures that would not approach SFM in a holistic way, e.g. in areas of nature or sustainability criteria, could cause counterproductive consequences to the social, environmental and economic viability of forests and the forest-based sector and thus hamper developments of sectors essential to achieve the EU carbon neutrality and with it the EU Green Deal.

CEPF believes the above-mentioned issues should be considered when developing action and policies required for EU net-zero carbon solutions and is looking forward to contributing to the next steps of the process.