

CEPF answer for a public consultation for a 2040 climate target in the European Union

European forests and the forest-based sector play a key role in achieving the EU climate neutrality target by contributing to fossil-free bioeconomy while keeping forests healthy due to active, sustainable forest management. This is why private forest owners in Europe are closely following the discussion on the EU climate target for 2040, especially what it comes to the targets for Land Use, Land Use Change and Forestry (LULUCF) sector and related carbon removal certification in forests.

CEPF would like to highlight that forest-based climate actions are based on long-term processes, which means that forest owners should be encouraged to continue managing their forests with long term perspective, to keep their forest resilient and ensure multiple societal benefits now and in the future. Forest owners contribute to climate work. Since 1990 both the forest area and the volume of growing stock have continued to increase in all regions in Europe.¹

Over the last years, EU forests have been increasingly impacted by climate change (e.g. fires, droughts, storms). Active and sustainable management, which are tailored to local circumstances, is needed to enhance forests' resilience to climate change and related natural disturbances. However, European forests cannot alone be responsible in leading the EU to the climate neutral path, and all sectors need to engage.

The evolution of the LULUCF sink is uncertain due to natural disasters, whether from abiotic factors, such as forest fires, or biotic factors as pests and diseases. Therefore, it should be recognised that the capacity of achieving climate neutrality should not depend only on the forest sinks. Climate change has strong influence on forests' sink and storage development and therefore it should be considered that forest carbon accumulation is not permanent and timely, sustainable forest management prevents forest damages.

At the same time, if overprioritizing carbon sinks in short-term over cutting fossil emissions by e.g. setting-aside more forests from management, it could lead into decreasing harvesting levels and put forests at risks, with possibly becoming a source of emissions, as unmanaged forests are at higher risk in terms of natural disturbances. Prioritising carbon sinks on a short-term over long-term forest management could also lead into continuity of using fossil-based materials.

The prioritisation of increased level of carbon sinks in forests could discourage forest owners from managing their forests, which would impact their social, environmental, and economic functions. European forest owners are therefore calling for a comprehensive impact assessment where the environment, economic and social aspects of the new climate target for 2040 are duly assessed. To acknowledge the fact that sustainably managed forests help to adapt to and mitigate climate change, the EU climate target should be set out in a realistic way that supports practices on the ground.

On the question for combining sinks and sources to a common AFOLU pillar, European forest owners support the facts of not bringing emissions from non-CO₂ agriculture into LULUCF sector. To reach ambitious climate targets, all sectors need to do their share and forests' role should not be compensating emissions from other sectors.

¹ <https://efi.int/forestquestions/q15>



On carbon removal certification CEPF finds the proposed regulation by the Commission as an important first step in the process of creating voluntary markets for carbon removals and recognizing the valuable work of forest owners in decarbonising Europe. European private forest owners welcome especially the opportunity to be compensated by committing to carbon sequestration in forests thank to their work in their forests, as well as producing raw material for wood-based products which store carbon and substitute fossil materials. The basis for this is sustainable forest management.

Carbon removal markets should be well accompanied by measures which recognize the need for continuous forest management that respects national differences and support the sustainable use of wood in a view of reduction of fossil emissions.

To meaningfully unlock the potential of European forests in carbon removals and other corresponding ecosystem services, European forest owners underline the paramount importance of clarity and transparency. The design of carbon removal certification framework shall mark the path for forestry in a well-defined manner, considering the potential of a 'carbon forestry' framework in the future.

CEPF also highlights the need for the EU legislation to have a mechanism for corresponding adjustments according to Paris agreement articles 6.2. and 6.4. Therefore, the EU should introduce clear rules how Article 6 of the Paris agreement is being implemented in the Union, so that forest owners would gain a level playfield with third countries regards to voluntary carbon markets.