

## CEPF reply to EC Roadmap on the new EU Forest Strategy

CEPF would like to provide the following comments on behalf of the 16 million European forest owners who we represent.

### 1. Elements that we support

- The recognition of the need for a comprehensive strategy to ensure that forests are addressed in a consistent manner across the different policies
- The EUFS will build on Sustainable Forest Management (SFM)
- The EUFS will foster on adaptation of forests to climate change and on strengthening their resilience to face future challenges
- The strong economic dimension that the EUFS will have to have
- The fact that the EUFS will have to lay the foundations for innovation and promotion of new products that replace fossil-based materials and effectively contribute to a new climate neutral society
- The highlight that will be given on training, skills and jobs
- The need to foster innovative financial incentives
- The need to improve forest monitoring and the role that the EUFS should play

### 2. Our views on the key objectives announced: afforestation, restoration and preservation

The scope of these objectives is too limited and does not reflect the whole picture of the many challenges for EU forests nor the full potential of services forest already provide for the society. Such scope is not enough to secure a consistent approach between the EU's domestic policies that the roadmap calls for and is missing consideration and support to dynamic SFM framework. It also does not seem compatible with the strong economic dimension, including the development of circular bioeconomy, that the EUFS will have to have. Regarding the restoration and preservation obj, the purpose and rationale should be clarified.

### 3. Important elements that we are missing

The EUFS should be the key tool to make forest impacting policies work in the same direction. It should create an enabling framework conditions that does not hamper the implementation of sustainable forest management at national level which is a national competence.

The Roadmap is ambitious and it has many objectives. However, the legal basis for so many miscellaneous objectives is unclear. In the “problem that the initiative aims to tackle”, the roadmap



does not mention directly forests as the producer of wood, which is the most climate friendly raw material.

We believe that SFM in Europe should build on the work of Forest Europe. Therefore, a reference to Forest Europe SFM definition, criteria and principles should be added.

The roadmap does not highlight the importance to maintain and strengthen motivation of forest owners and managers to manage their forests furthermore. It also does not address the need to work and progress on implementing payment of ecosystem services (PES) especially in the field of climate protection and when SFM is subject to policy restrictions. Finally risk management should be incorporated in the management of forest areas.

#### **4. Important clarifications that we need**

We have strong concerns about the call “to foresee measures to avoid or correct unsustainable practices » which implies that forests are not sustainably managed. Clear definition of “unsustainable practices” based on sound information should be provided before making such call.

We do not understand the call “to strive to decrease the loss of forest coverage” given that EU forest coverage has been increasing for decades

A definition of “last remaining primary and old growth forests who may need strict protection” should be provided

#### **5. We support the views of European Parliament and Member States**

We are calling the Commission to build on Council conclusions (11/11/20) European Parliament Resolution (8/10/20) which are calling to take a holistic approach to address forests and their multifunctionality, to build on SFM as defined under Forest Europe and to respect the distribution of competences between the EU and Member States

From forest owners views, it is important that SFM and forests multifunctionality are the main guiding principle in the new EUFS