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Confederation of European Forest Owners' position on the inclusion of LULUCF in the EU 2030 Climate and Energy framework

The Paris Agreement states that in the second half of this century human-induced greenhouse gas emissions by sources and removals by sinks, such as forests, should be in balance. This long-term objective must be reflected in the upcoming EU policy on how to include Land Use, Land Use Change and Forestry (LULUCF) into the EU 2030 Climate and Energy framework.

In the last decades, thanks to active and sustainable management, EU's growing forests have sequestered an amount of CO₂ from the atmosphere corresponding to around 10% of the EU's total greenhouse gas emissions. The Paris Agreement, in its Article 5, highlights the important role of carbon sequestration in forests. In order to tap into the full mitigation potential of forests also in the future, the EU's climate and energy policy must recognise, as already recognised in the new EU Forest Strategy¹, in the IPCC 5th Assessment report² and in the Paris Agreement, that active and sustainable forest management and the use of wood-based products are effective means to mitigate climate change. Setting aside forests from sustainable forest management with the objective of preserving a certain carbon pool is not an option. In the EU, a correlation between using the forest and having a large forest carbon sink can be seen and there is significant potential to sustainably increase harvest levels³.

In the medium and long term, the largest sustained climate change mitigation and adaptation is reached through sustainable forest management, which maintains or even increases forest carbon stocks and sequestration of CO₂, while producing an annual sustained yield of timber, fibre and bioenergy from the forest. Carbon is stored in products and renewable wood and biomass substitutes fossil fuels and energy-intensive materials, promoting the shift to a fossil free society. And, at the same time, through active management, forest resilience to climate change and disturbances can be enhanced.

When developing the EU 2030 Climate and Energy framework and defining the further details of the inclusion of LULUCF, the following key aspects must be considered:

- The EU should deliver transparent and consistent policy conditions with coherent policies, creating a supportive environment for forest owners to continue investing into active sustainable forest management and the forest-based industry to remain and increase their competitiveness.
- LULUCF should be kept as a separate pillar in the future EU 2030 Climate and Energy framework. This allows to take the specific characteristics of the sector better into account, as well as to put the focus on increasing sequestration and substitution.

¹ COM(2013) 659 final – A new EU Forest Strategy: for forests and the forest-based sector

² http://www.ipcc.ch/pdf/assessment-report/ar5/syr/AR5_SYR_FINAL_SPM.pdf

³ Nabuurs et al. (2015). A new role for forests and the forest sector in the EU post-2020 climate targets. From Science to Policy 2. European Forest Institute.



- The framework should promote increased forest growth (i.e. sequestration), storage in Harvested Wood Products (HWP) and substitution. Therefore, it should allow limited flexibilities between the different sectors. For example, Member States could use a certain amount of credits from the LULUCF sector towards their target in the Effort Sharing Decision. This could serve as an incentive to further boost sustainable forest management and use of wood and biomass, hence decarbonising the economy.
- The EU should strive for a common, global framework on LULUCF, where accounting applies to all countries, ensuring that biomass imported from outside EU is fully accounted for.
- The no-double counting rule should be respected. IPCC guidelines establish the accounting of emissions from bioenergy – the emissions, by default, are accounted in the LULUCF sector immediately when biomass is harvested, and should not be counted again as this would lead to double counting.
- Accounting rules must:
 - Not lead to limitations of active forest management;
 - Include credits from forest management – afforestation is an important activity for climate change mitigation, but it must be recognised that this potential is limited in the EU, especially in certain Member States;
 - Reflect the actual forest potential, growth and sequestration rates – an actual forest sink should not become a source because of artificial accounting rules;
 - Consider the natural long-term life cycles and mitigation potential of forests;
 - Fully account for and include credits from Harvested Wood Products (HWP) in order to further support the sector’s contribution to bioeconomy and climate change mitigation;
 - Be simple and transparent.
- Forest management reference level should be established by and at Member State level, with a bottom-up approach considering the forest and forest sectors varying conditions, and be confirmed and approved at EU level. Furthermore, there should be no flexibilities between Member States (countries with large forest cover should not pay for the emissions of other countries through their forest sinks).

Independent from these details, and to conclude, the concept of sustainable and active forest management and the further enhanced use of wood should be promoted as effective contributions to mitigate climate change and to enhance adaptation. In synergy with this, the significant contribution of the forest sector to the economic well-being and growth of many European regions, providing jobs and income to millions of EU citizens, particularly in rural areas, can be ensured and increased. To make this happen, supportive policy framework conditions are needed and the millions of private forest owners, which own and take care of about 60% of EUs forests, should be well recognised as key partners in this policy.

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 multifunctional and 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/>