

Feedback on the proposal to amend the LULUCF Regulation

The Confederation of European Forest Owners (CEPF) welcomes the Commission's recognition of the LULUCF sector's contribution to mitigate climate change. However, CEPF has concerns on the new carbon removal target of 310 Mt of CO₂e that may lead to reducing harvesting levels in forests which are currently sustainably managed.

A possible decrease of harvested volumes would hamper the active contribution of forests to fight against climate change. This would not encourage the storage of carbon in wood products and the replacement of fossil-based materials and energy thanks to the substitution effect of wood.

CEPF highlights that the Commission's proposal on LULUCF is too short-sighted. The objective of storing carbon in forests by making forests play only as sinks is not a long-term solution to mitigate climate change. To get forests' full mitigation potential, the EU should recognize that active and sustainable forest management and the use of wood-based products and energy are effective ways to mitigate and adapt to climate change.

Effective climate actions are needed also after 2030, which means that forest owners need to continue managing their forests actively to keep their forest resilient and ensure multiple benefits from EU forests now and in the future. Forest owners can contribute to the climate work by increasing the CO₂ uptake, by committing to regular harvesting and regenerating activities which both enhance the growth of forests and sinks in the medium and long term. Consequently, since 1990 both the forest area and the volume of growing stock have continued to increase in all regions in Europe.

Since several years, some EU countries have experienced a significant mortality of forest stands linked to drought. However, through active and sustainable management, forests' resilience to climate change and disturbances can be enhanced. However, European forests cannot alone be responsible in leading the EU to the climate neutral path but all sectors need to engage. Therefore, there should not be a common sector for LULUCF and agriculture since the sectors are very different in terms of greenhouse gas emissions and removals and forests should not offset emissions of other sectors.

CEPF regrets that the impact assessment of LULUCF regulation does not evaluate the impacts of decreasing harvesting volumes resulting from the different policy options such as the impacts on bioeconomy developments and forest owners' viability. CEPF is therefore calling for such evaluation. Finally, European forest owners emphasize that Member States should be closely involved in the definition of the carbon removal targets (method, data etc.) given that they know best their forest-related data and their capacity in achieving carbon removal targets.

Regarding the next steps of the preparation, CEPF demands EU institutions to take into consideration the following:



- The EU should continue supporting Member States in maintaining sustainable forest management practices and not limit active forest management.
- The target of 310 Mt CO₂ removal is too ambitious. Its impacts on the harvesting volumes and the substitution effect of the use of wood should be properly evaluated, particularly in view of the development of bioeconomy but also jobs and the economic vitality of the forestry sector.
- EU Member States should be involved in setting of their national carbon removal targets.
- Given the ongoing and future impact of climate change on EU forests due to natural disturbances (diseases, forest fires and draughts), Member States should have enough flexibility to reach the possible carbon removal targets.
- In order to reach a climate neutrality, the EU should promote all uses of wood and not only Carbon Storage Products since all uses of wood allow to substitute fossil fuels-based materials and energy.
- The EU should not merge agriculture, forestry and land use into a new sector which could lead in forest sector offsetting other sectors' emissions.