JOINT STATEMENT

Draft new EU Forest Strategy: time to really consider the opinion of EU forest and forest-based sector

While the future EU Forest Strategy post-2020 is expected to be published on 20 July, the EU forest and forest-based sector has very deep concerns about the draft which is currently in inter-service consultation within the European Commission. The views expressed by the sector over the last months have, unfortunately, not been taken into consideration in the draft. In addition, the calls from the European Parliament¹ and Council² regarding the new Strategy appear to have been overlooked.

We urgently call on the European Commission to seriously take into consideration the opinion of the forest and forest-based sector ahead of the publication of the new Forest Strategy and make significant changes to the draft. Continuing to ignore the views of our sector risks provoking a disruption of the EU’s entire forest and forest-based sector and completely disregarding the need for motivation and endorsement of the millions of people who “make it happen” on the ground. This would result in a failure in the implementation of the Strategy.

The new Forest Strategy must create a balance of the various functions which deliver all ecosystem services, including supporting the entire forest-based value chain to remain competitive and continue to contribute to a greener economy.

² Council conclusions on Perspectives for the EU forest-related policies and EU forest strategy post-2020 - (10 November 2020)
1. **Data about the state of forests should be complete and properly utilised**

While various sources of data are available, the EU Forest Strategy and its objectives should build on a thorough assessment of the status and trends of forests, especially as forest resources are subject to global, pan-European, EU-based and national assessments. However, any data which is collected and reported must be corroborated with the national forest monitoring and forest management statistics of the competent Member State authorities in order to avoid misleading information. Data sources should also always be mentioned.

2. **Sustainable Forest Management and multifunctionality should continue to be the main principles of the new strategy**

Sustainable Forest Management (SFM) practices applied in EU forests clearly show that the ecological functions of ecosystems, including biodiversity, can be maintained in actively managed forests alongside the provision of biomass, timber, non-wood products, and other ecosystem services, while still contributing to climate change mitigation and adaptation.

Forest ecosystems are becoming increasingly prone to various climate change-induced biotic and abiotic pressures, such as fires, droughts, and storms, as well as pest and disease outbreaks. SFM is the optimal way to keep forests resilient and adapted to climate change, thus allowing them to contribute to the objectives of the EU Green Deal.

Due to the diversity of forests, and contrary to what the draft implies, there is no “one-size-fits-all” way to manage forests. Forest management practices reflect this diversity and are embedded in national and regional legislations according to the competence distribution and subsidiarity principle that are in line with Forest Europe criteria and indicators. Setting a new legal framework that would include a coordinated forest planning and management tool at EU level or setting EU indicators and thresholds for sustainable forest management would not only have a strong impact on the sustainable management of EU forests but would also distort this officially agreed set-up.

3. **The bioeconomy should be more than long-lived wood products and should rely on an integrated value chain**

The EU forest and forest-based sector is an essential ingredient in the recipe for achieving the 2050 carbon neutrality goal since it contributes to climate change mitigation in three essential ways (the so-called “3 Ss”): carbon sequestration, carbon storage in trees and wood products, and carbon substitution by providing raw material as a substitute for fossil fuel-based material and energy.

Prior to harvesting high-quality wood raw material, it is necessary to carry out several other management operations which result in delivering other qualities of wood for other uses. Therefore, supporting long-lived wood products requires supporting active forest management, including the production and consumption of other wood-based products such as paper, packaging, and energy, which are necessary to achieve EU carbon neutrality objectives. Artificially prioritizing long-lived wood products over other wood products would mean ignoring the forest management cycle as well as the high level of resource efficiency the entire forestry value chain already applies. If the new EU Forest Strategy wishes to promote and boost a sustainable bioeconomy in the EU, it should logically embrace all uses of wood, consistent with already adopted European legislation and agreed objectives.
As far as research and innovation are concerned, the European forest-based sector’s existing Research and Innovation Agenda\(^3\), which covers the whole value chain, should be recognised as a starting point when proposing any future research and innovation activities.

4. **Support foreseen for forest owners and managers should be comprehensive**

In its policies on climate change, biodiversity, bioeconomy, rural development, and renewable energy, the EU has set out very ambitious objectives concerning forests. Currently, it is mainly timber that provides the necessary funding for the multifunctional management of forests. Financial support and incentives must go hand in hand with forest management as part of the open market economy. New forest-related policies must, therefore, not limit the economic development of forests and impact jobs in the sector. They must continue to provide financial support to both state and private forest owners and managers in achieving their multifunctional role, especially to increase the climate-resilience and adaptation of EU forests. In parallel, payment for ecosystem services other than wood supply should be developed, provided they remain voluntary and are accompanied by dedicated financial tools and a sufficient budget.

Political and societal support, consisting of acknowledging and encouraging the experience and expertise of forest owners and managers and their daily work and efforts, is also needed.

Furthermore, support to forest owners and managers means addressing the complexity of forests and forestry that mostly lies in the diversity of forests, their ecosystems, and their owners and managers. The dualistic statements currently being proposed in the draft new Forest Strategy concerning forest management practices and how forests should be better managed are the opposite of supportive.

5. **A thorough assessment should be undertaken prior to developing any new forest certification scheme**

Forest certification in the EU-27 already entails approx. 78 million ha of the total EU forest cover. Robust voluntary forest certification schemes, such as FSC and PEFC, have long-standing expertise in promoting sustainable forest management practices which also encompass biodiversity objectives on the ground and have rigorous procedures in place to ensure that all requirements are applied diligently. Hence, existing forest certification schemes can complement and support the implementation of EU forest-related policies. Moreover, voluntary forest certification schemes have evolved throughout the years. The scrutiny by the EU Institutions of these systems is welcome as it helps to continuously improve them.

The new voluntary EU forest management certification scheme, as proposed in the draft, would risk duplicating efforts and associated costs and may lead to creating complexity among market players, undermining the efforts they have made so far as well as the trust and confidence they have received through existing certification. Furthermore, an additional scheme risks causing confusion and misleading consumers. Hence, any new scheme would require a thorough prior assessment to identify costs and benefits as compared to those already provided by widely accepted existing schemes which already exist across the EU. Rather than creating a new certification scheme, the EU Commission is encouraged to provide support for small-scale producers to invest in the existing certification schemes and encourage these schemes to further improve.

\(^3\) FTP Strategic Research and Innovation Agenda 2030
Signatories:

Bioenergy Europe
European Confederation of the Woodworking Industries (CEI-Bois)
European Organisation of Agricultural, Rural and Forestry Contractors (CEETTAR)
Confederation of European Forest Owners (CEPF)
Confederation of European Paper Industries (CEPI)
European Farmers and European Agri-Cooperatives (Copa and Cogeca)
European Landowners’ Organization (ELO)
European Organisation of the Sawmill Industry (EOS)
European State Forest Association (EUSTAFOR)
European Federation of Forest-owning Communities (FECOF)
Forest-based Sector Technology Platform (FTP)
Program for the Endorsement of Forest Certification (PEFC)
Union of European Foresters (UEF)
Union of Foresters of Southern Europe (USSE)