

Brussels, 10 August 2018

**Feedback on the European Commission Roadmap:
Strategy for the long-term EU greenhouse gas emissions reductions**

The Confederation of European Forest Owners (CEPF) welcomes the European Commission initiative to present a new strategy for long-term EU greenhouse gas (GHG) emissions reductions in accordance with the Paris Agreement. At the core of solving climate change lies the need to stop introducing fossil emissions to the atmosphere and move to a fossil-free bioeconomy. This objective must be reflected in the EU's climate policy.

More than 40% of EU's land area is covered with forests of which approximately 60% are privately owned. Growing European forests sequester about 10% of EU's total greenhouse gas emissions each year and provide a climate-friendly raw material, jobs and development in rural areas, biodiversity, soil protection, recreation and ecosystem services. In addition, the EU forest area has increased by the size of Portugal in the past 25 years and the EU forest sink has been stable around 300 Mt CO₂ equivalents.

In order to achieve the right balance between anthropogenic emissions from sources and removals from sinks of greenhouse gases, CEPF addresses the importance of maintaining forest carbon stock and the need to urgently reduce carbon emissions so the Paris Agreement targets can be reached. On the other hand, leaving forests standing to build up a "forest carbon museum" is a misguided approach and not a sustainable long-term solution, especially when taking into account increased risk of natural disturbances such as forest fires and storms due to climate change. Therefore, CEPF underlines the importance of keeping carbon balance in land use sector without a specific target for the sinks.

European forest owners have a crucial role as managers of forest resource, not only on tackling challenges related to social and economic sustainability but also on challenges related to the impact of climate change on the resilience and vitality of forests. In addition, prevention of natural disturbances and forest fires that cause significant carbon losses is of utmost importance and closely linked to the sustainable forest management. Forest owners' investments in active and sustainable forest management has increased forest resources, including growing stock and the size of forest area during the last decades in Europe. Therefore, investments in active and sustainable forest management are one of the prerequisites for the development of climate resilient forest resources in the future and for achieving carbon neutrality by 2050 according to Paris Agreement.

Consequently, CEPF considers that the initiative should aim at:

- analyzing scenarios and taking into account the core link between sustainable management and long-term climate goals to be achieved via increased CO₂ sequestration, carbon storage and substitution of fossil-based materials. Incentives and market-based tools for promoting these values in the forest-based sector should be developed.



- finding synergies between sectors. In particular, the focus should be on decarbonizing energy intensive sectors, such as construction and transportation, by using renewable raw materials instead of using forests to compensate other sectors' emissions. Therefore, as it comes to the LULUCF post-2030 it is important to keep the LULUCF sector as a separate pillar in the EU climate policy with the incentive for long-term sustainable and active forest management.
- strengthening GHG emissions reductions while acknowledging the implementation of existing European and national policies and regulations that ensure the sustainability of forest biomass sourcing. This should be taken into account before taking any action on developing a new regulatory framework with additional, unnecessary, burdens.
- supporting the use of forest bioenergy that plays a crucial role in EU's renewable energy palette while moving towards the bioeconomy. In addition, increased biomass mobilisations prevents devastating forest fires that cause high risks for people, climate and environment.

Moreover, CEPF highlights that the future strategy shall be coherent with the current political priorities such as the UN SDGs and EU policy developments, e.g. the 2030 Climate and Energy Framework including the recast of the Renewable Energy Directive and the regulation on the inclusion of emissions and removals from the Land Use Land Use Change and Forestry (LULUCF) into the 2030 Climate and Energy Framework. In addition, the Commission should aim at fostering the link with the EU Bioeconomy Strategy, EU Forest Strategy and the Common Agricultural Policy post-2020 in order to accelerate the transition from fossil-based society to a bio-based one.

CEPF remains confident that the European Commission will make the necessary decisions to ensure that the potential contribution of European forests and the forest-based sector, as regards their fundamental role within the EU climate and energy framework, is used to optimal benefit.