

## Working Document

### Comments on the draft new EU Forest Strategy

8 July 2021

Chapter 1	Comments
This is the first EU Forest Strategy written at the onset of accelerating biodiversity loss and nature crises	We are facing several great challenges, with climate change being the most serious, affecting ecosystems, the way we manage natural resources and our economy. The context should also remind that we are in the middle of an unprecedented global economic crisis caused by Covid pandemic
The ambitious vision presented in this Strategy relies greatly on motivation and dedication of all relevant stakeholders, namely forest and landowners and managers, and it therefore seeks to develop financial incentives, in particular for private forest owners and managers, for the provision of ecosystem services	This should be done through safeguarding private forest ownership rights and with sufficient financial resources
Increased human activities and pressure	It is not possible to state this without explaining it because it is not the case given the percentage of harvest compared to the natural increase
Ecosystem condition is poor even in the 27% of the EU forest area that is protected and should be healthiest	This refers to the EEA's report: State of Nature in the EU, based on MS reporting under Article 17 of the Habitat Directive. This result needs to be put in perspective with other sources of information available regarding ecosystem conditions in EU forests to present a complete and objective picture. Indeed, the EEA's report uses four parameters to determine the conservation status of habitats (range, area, structure and functions, future prospects). If one of the parameters is considered to be unfavourable, the entire habitat is considered unfavourable. At MS level, the assessments and the methodologies applied are not consistent and coherently conducted in a scientific manner; sometimes even based on single expert assessment. Despite EEA's effort to harmonize and correct the data received a significant risk remains that the results do not necessarily show the real status of a specific habitat. Even if certain measures have been implemented aimed at countering biodiversity loss, the time lag to see the impact on biodiversity is often

	<p>not taken into consideration Therefore, the EU Commission cannot extrapolate the ecosystem status of all EU forest areas based on the status of some specific forest areas which are reported upon.</p>
<p>The tree cover loss has accelerated from 27% in the period 2001-2012 to 74% in the period 2009-2018 and increase in harvest for different economic purposes has been widely documented</p>	<p>The timeframe during which a tree cover change (whether loss or gain) is being assessed is to be duly considered. If a very short time frame is considered any change of structure (whether due to natural processes, climate change induced disasters or forest management) would be accounted. Tree cover change should be considered on long time scale to respect the natural timeframe of forests and trees. In addition, the diminution of such indicator (tree cover) can hide different causes (e.g., defoliation or change in stand structure). There is a risk of confusion of tree cover loss, increase in harvest and forest cover, which are different things. It would be essential to provide detailed information on the “wide documentation” that is referred to. Recent debate between JRC and EFI following the article published in Nature in summer 2020 has shown that this question deserves thorough analysis. Moreover, the period of time that is compared is not equal in length nor regarding specific challenges (climate change impact has increased over the last years and is impacting more forests than in the first year of 2000 – this isn’t linked to any planned harvest). Forest owners and foresters cannot accept claims, data or information which are partial or presented in a biased way. EUROSTAT clearly demonstrates that forest cover has increased in EU. In 2020, the EU had an estimated 159 million ha of forests. Their area has increased by almost 10% since 1990 (<a href="https://ec.europa.eu/eurostat/web/products-eurostat-news/-/edn-20210321-1">https://ec.europa.eu/eurostat/web/products-eurostat-news/-/edn-20210321-1</a>)</p>
<p>We must also ensure the availability of wood materials to substitute fossil-based counterparts, as well as boost forest-based economic activities that do not rely on wood resources extraction to diversify local economies and jobs in rural areas</p>	<p>Substitution of fossil fuels also goes with reduction of EU dependency on fossil-based resources. This aspect of the reduction of dependency is not addressed in the draft.  Supporting the diversification of local economic and boost forest-based activities other than harvesting does not mean that it is necessary to reduce wood harvesting, especially if it is done under sustainable conditions.</p>

Cascade principle	<p>The reference to this principle should be based on <i>the EU guidance on the cascading use of biomass with selected good practice examples on woody biomass</i>. This principle should not be reinvented as suggested in the draft</p> <p><a href="https://op.europa.eu/en/publication-detail/-/publication/9b823034-ebad-11e8-b690-01aa75ed71a1/language-en/format-PDF/source-80148793">https://op.europa.eu/en/publication-detail/-/publication/9b823034-ebad-11e8-b690-01aa75ed71a1/language-en/format-PDF/source-80148793</a>.</p>
<b>Chapter 2</b>	<b>Comments</b>
Protecting, restoring and enlarging EU's forests to combat climate change, reverse biodiversity loss and ensure resilient forest ecosystems	The strategy should have a separate chapter focusing on adaptation and mitigation to climate change
Introduction: there are repetitions about the need to urgently protect, restore and adopt biodiversity friendly practices	With these repetitions, the reader can only be convinced that the owner is not doing a good job since it must be restored and adopt a more respectful management of biodiversity, whereas caring about biodiversity and working to maintain it to ensure resilient forests for future generations are intrinsic values for forest owners
Carrying out intensive logging during nesting period should be avoided	<p>Nesting periods are already regulated in a very detailed way at national or regional level</p> <p>There is a need for clarity and nuance (which is unfortunately missing in the text) and to address the gap between political statements and the reality of the ground</p>
limiting extractive human activities from none to minimum	<p>Problematic terminology - forestry must not be considered as an “extractive activity”: this has recently been duly considered in the framework of the NADEG work on the technical note on protected area. Forest management goes well beyond the sole harvesting of timber, and even harvesting impacts cannot be compared with extractive activities such as mining (which the current wording implies).</p> <p>With climate change, we will witness the change of tree species and ecosystems and the spread of unwanted alien species. Only sustainably managed forests can withstand all these changes and challenges to provide the wide range of ecosystem services</p>
clearcutting	The form with which a “patch” becomes a clear cut depends on your understanding. Many MS already have a set (and different) area defined as threshold, reflecting their forest types. Why should it be harmonised? In addition, it does not make sense focusing on clear-cuts on one side and not addressing at all forest fires on the other side. Clearcutting can be carried out in various ways and many options to lower the

	<p>impact of this harvesting method (incl. soil protection ) are already defined and being applied at national and regional level</p> <p>There is a need for clarity and nuance (which is unfortunately missing in the text) and to address the gap between political statements and the reality of the ground</p>
<p>Taking care of soil is particularly important ... undue use of heavy machinery that cause soil compaction should be avoided</p>	<p>The prescription of management equipment is not an issue that the EU Commission has to deal with. This is part of national forest legislation. Part of SFM is that the access to the stands with machinery is limited to infrastructural paths. Scientific studies do not confirm that soil compaction with proper equipment and appropriate working methods would be a major problem. About machinery, the challenge is less the weight of the machines (because they are equipped with low pressure tires) rather than the way they are used regardless of their weight, which is also subject to rules and frameworks at national or regional level. Depending on soil condition and topography also ropeways are used. In addition, there are other factors with heavy impacts on soil, like e.g., the combination of wildfire, heavy rains and erosion. Machinery has been subject to constant research and innovation to keep improving their ability to work on the forest ground. When addressing the machinery related questions, the problem of the large number of injuries and fatalities caused by manual work should also be duly reflected</p> <p>There is need for clarity and nuance (which is unfortunately missing in the text) and to address the gap between political statements and the reality of the ground</p>
<p>Therefore, building on the Forest Europe (...) the commission will identify additional indicators...</p>	<p>As a legislative proposal, it lacks justification. The structure and work of Forest Europe should not be dismissed. If there is a need for additional indicators, instead of going alone, the EU should consider such proposal within the framework of Forest Europe Process, as the EU is a signatory to this unique pan-European Process</p>
<p>Increasing protection and restore forest biodiversity and adopt biodiversity-friendly forest management practices are a great economic opportunity, if forest owners and managers are properly supported in the transition</p>	<p>Detailed explanation on the great opportunity should be provided as well as on what kind of support forest owners could receive. We do not understand to what transition the text is referring to. Such statement seems to imply that current management are not including biodiversity concerns, which is inaccurate</p>

	In areas with developed tourism, the benefits are usually mostly passed on to non-forest owners. Restrictions, adjustments, burdens and damage remain the problem for forest owners. It would be interesting if the Commission could clarify and inform forest owners about any existing good practices where this benefit would be passed on to forest owners
Management practices like uneven-aged and continuous-cover forestry, sufficient quantities of deadwood, regulation of wildlife densities and the establishment of protected habitat patches or set aside in production forests help ensure long-term environmental and socio-economic viability of forests	Some of these practices could have an impact on the resilience of the forest, against the fight on pests and diseases and forest fires. In addition, it would be interesting if the Commission could provide detailed explanation how this will ensure long-term socio-economic viability without almost no management, more regulatory burden and less income from forests
FM framework will have to be reinforced, notably as regards criteria relating to ecosystem health, biodiversity and climate change so that it can become a more detailed screening tool to determine and compare different management approaches, their impact and the overall state of EU forests. (...) The Commission will identify additional indicators as well as thresholds or ranges of SFM	Any discussion on indicators and criteria should take place under Forest Europe. It is not under the Commission responsibility to identify additional indicators and work on thresholds
Subject to the impact assessment, these will be included in the future legislative proposal on the EU Forest planning and monitoring	It is not clear about which IA we are talking about. Including this under a legislative proposal will go against the subsidiarity principle and competence distribution
Roadmap for planting at least 3 Billion additional trees by 2030	It is important that the locations where these additional trees are to be planted, will be well considered (i.e. whether in forest, rural areas, peri-urban or urban areas). The socio-economic impact and realities of a Member State should be taken into account. In addition, already existing objectives in the Member States should be taken into account.
2.4. Financial incentives for forest owners and managers for improving the quantity and quality of EU forests	This should be subject to a separate chapter (not under the biodiversity chapter) and include all EU financial tools that could be used to support the sector and promote coherent policies that encompass all sustainability pillars
1. Propose a legally binding instrument for ecosystem restoration, including forest ecosystems	What is meant by ecosystem restoration – which functions are to be restored – what is the baseline – what are the concrete objectives?

2. Develop guidelines on the definition of strict protection, including definition, mapping, monitoring and strict protection of primary and old-growth forests	Is this a reference to the ongoing work undertaken to implement the biodiversity strategy ?
3. Identify additional indicators as well as thresholds or ranges for sustainable forest management to be included in the future legislative proposal on EU forest planning and monitoring	No duplication of work – the European Commission needs to engage in the Forest Europe process. Whereas, European Forest Owners have always been opened to discuss existing SFM criteria and indicators to possibly adapt them, this does not mean reinventing them. Forest planning is not the competence of the European Commission – it is within the competence of the Member States, including the definition of thresholds and ranges related to sustainable forest management
4. Develop guidelines on biodiversity friendly afforestation and restoration	See comments to point 2
5. Develop a definition and adopt guidelines for closer-to-nature-forestry practices as well as criteria for closer-to-nature forest management certification scheme	First part see comment to point 2 Second part – no duplication of work – there are two operational forest certification systems that are already accepted in the market – the EU should engage with them rather than inventing something that is of no added value neither to the market nor to the public; there is an oversaturation in the market for labels which are meaningless to consumers if they are 1. Resulting in higher prices 2. No clear concerning the concept they stand for => closer to nature forestry is a wide concept that cannot be defined under a top-down EU certification approach. There are already local initiatives, such as ProSilva network, which are based on a sound combination between science and practical experience and do include economic functions of forests. 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.
6. Provide guidance and promote knowledge exchanges on good practices on climate adaptation and resilience, using inter alia the Climate-ADAPT platform	Who will be the beneficiary of this knowledge exchange – Member States, forest owners, forest science, civil society?

<p>7. Supplement the revision of the Regulation on forest reproductive material with measures to boost the availability and distribution of forest reproductive material suitable for future climatic conditions</p>	<p>Interesting approach – who will do the ground work to test the reproductive material? Will this be centralised? Will the agencies in the Member States that have decades of experience with that be involved or would this be a top-down exercise?</p>
<p>8. Promote forest-related interventions in the CAP in relation to European Green Deal objectives, following the mid-term assessment of the CAP Strategic Plans</p> <p>In the context of the long-term vision for rural areas, a network of forest-dominant rural areas and municipalities will be promoted to give voice to forest rural areas.</p> <p>The Commission will strive to increase the uptake of rural development available for the purposes of this strategy</p> <p>The Commission will furthermore carry out a study on behavioural science applied to the uptake of foresters of public funds to better identify further policy improvement routes</p>	<p>What does this mean concretely? The rearrangement of funding under the CAP will lead to severe conflicts in rural areas as agriculture will not be ready to reduce its funds.</p> <p>In a number of Member States, forestry measures are not a priority thus it is likely that no significant funds will be allocated to SFM. Therefore, a proper compensation of forest owners' work can't be seriously envisaged through CAP founding.</p> <p>What is the definition of forest dominant rural areas and municipalities?</p> <p>What will be the way and possibility for the Commission to do that given the more flexible system defined under the new CAP and the fact that the agricultural sector will probably try to keep as much support as possible? Given this new flexibility, the Commission will have no mean to ensure that a certain share of RD fund goes to forests</p> <p>The main reason why CAP fundings are not entirely used in the forest sector is the very heavy administrative burden to get access to these findings, which discourages a majority of forest owners. Is there really a need for behavioural science study?</p>
<p>9. Develop an action plan for carbon farming and carbon removal certification</p>	<p>What is exactly meant by carbon removal certification? How is such a certification going to be implemented and monitored? Is it for sure that forest owners will have access to such system ? NB CEPF has received a negative reply to participate to a recent Commission's workshop on this topic? So far, forest owners have received no concrete signals that they could implement and benefit from this certification.</p> <p>Whether using CAP founding or carbon farming certification to financially support forest owners, it is important to note that such support cannot be limited to money.</p>

	<p>Support also means recognition and acknowledgement of what forest owners have done and continue to do on the ground and political support to face the huge challenge that climate change means for forests. This political support should start with respecting forest ownership rights and addressing the complexity of forests and forestry that mostly lies in the diversity of forests, their ecosystems and their owners and managers. The text mentions the importance of motivation and dedication of forest owners but without such political support, forest owners will be more discouraged than motivated</p>
<p><b>Chapter 3</b></p>	<p><b>Comments</b></p>
<p>1. As part of the CAP and to increase forest support, provide new means to share information on good practices on best design and implementation of forest relevant information</p>	<p>Who defines what is forest relevant information – information on what? Tree species, soil condition, management practices?</p>
<p>2. Promote the use of Natura 2000 logo for non-wood forest-based products and services</p>	<p>Who is the target group to use this logo – forest owners, producers, retailers...?</p>
<p>3. In order to encourage long-term storage of carbon in construction products and turn part of the construction sector into a carbon sink, establish a standard, robust and transparent methodology to quantify the climate benefits of wood construction products and other building materials, reflecting the most advanced dynamic life cycle analysis techniques</p>	<p>This is a good approach which brings added value.</p> <p>However, if the support to wood in construction is obviously very much welcome, some concerns arise when it comes to the interpretation of cascading provided in this chapter. As far as we understand, it has never been agreed that cascading should mean the minimisation of wood use for short lived products and energy production. Such approach also ignores the economic reality of the territories based on the presence or absence of user industries and on the need to find outlets for all types of wood from a forestry operation if the ultimate goal of the management of the forest is to produce high quality wood.</p> <p>If foresters and forest owner do support long-lived products and do their best to provide raw material for this purpose, writing that <i>“land managers should be incentivised to increase forest areas suitable for long-lived production, in line with reinforced sustainable forest management favourable to biodiversity, resilience and climate adaptation”</i> totally ignores and disregards what managing a forest in practice actually means.</p>

4. Work to ensure that the review of the construction products regulation <sup>1</sup> better reflects the importance of considering temporary carbon storage as a key aspect of the environmental performance of products	See comments to point 3.
5. Consider including sustainable activities related to harvesting, production and use of wood products in the forthcoming reviews of the delegated acts of the Regulation Taxonomy on mitigation and circular economy	The DA of the taxonomy regulation, focused on climate, is already now a major barrier for market access of family forest holdings in the EU. To interfere in harvesting, production and use of wood is not the competence of the EU since the competence for that lies with the Member States; Instead, the EU should enforce the implementation of its own Bioeconomy strategy as a priority and not treat it like secondary priority
6. Identify and address possible hurdles posed by current EU legislation and the State Aid Guidelines to grant adequate public support to services beneficial for the public interest	Too limited – adequate public support should be possible for all priorities that Member States or their regions feel necessary to promote SFM on their territory, not only for services that are beneficial for public interest
7. Create a new alliance between the professionals of tourism and the foresters. It will involve the World Tourism Organisation and the network for Europe's natural and cultural heritage	There seems to be a basic misunderstanding – foresters and forest owners are not the same – if the alliance is only meant for professional foresters than 60% of EU's forests will not be part of the alliance
8. Build a toolkit to help Member States to establish life-long programs and advise to foresters and adapt education and training to the challenges and needs of today's realities, and to develop employment opportunities	See comment to point 7
<b>Chapter 4</b>	<b>Comments</b>
1. Put forward a proposal for a new legislative proposal on EU Forest Planning and Monitoring to ensure a harmonised EU forest monitoring, data collection and reporting system and coordinated and strategic EU forest planning	<p><i>Forest principles Annex III Rio declaration 1992</i></p> <p><i>Preamble</i></p> <p><i>(h) Recognizing that the responsibility for forest management, conservation and sustainable development is in many States allocated among federal/national, state/provincial and local levels of government, each State, in accordance with its constitution and/or national legislation, should pursue these principles at the appropriate level of government.</i></p> <p><i>Principle</i></p>

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1 Regulation (EU) 305/2011

	<p>1. (a) States have, in accordance with the Charter of the United Nations and the principles of international law, the sovereign right to exploit their own resources pursuant to their own environmental policies and have the responsibility to ensure that activities within their jurisdiction or control do not cause damage to the environment of other States or of areas beyond the limits of national jurisdiction.</p> <p>There seems to be basic misunderstanding in the governance approach of the European Commission towards the Member States. The European Commission should not interfere with issues that are better dealt with on national, regional or local level. Forest planning is precisely one of these issues.</p>
<p>2. As part of the Forest Information System for Europe (FISE), on the basis of improved Copernicus products and other remote-sensing data strengthen the monitoring of climate effects on forests</p>	<p>About forest monitoring, this cannot be limited to remote sensing-based tools. Remote-sensing technology must be complementary of in-situ data (in particular those from the national forest inventories). This is not at all the approach for the draft text which gives priority to remote-sensing and indicates that <i>“in-situ data” is still a key for improving EU monitoring for site specific indicators that cannot be monitored through remote-sensing</i>. The text rightly refers to Forest Focus that ended in 2007. One should remember that this consisted in a partnership between the Commission and Member States, with accompanying financial tools and clear political objectives and that this relied on ground data. The approach proposed in the draft text is going in the opposite direction</p>
<p>3. Prepare and publish regular reports and lay summaries with the support of a broader European forest science partnership</p>	<p>This is an interesting idea provided that the partnership is broad and balanced</p>
<p>4. Through its Joint Research Centre develop a European forest science partnership, with a view to support the development of new indicators based on remote sensing and the latest research results</p>	<p>This can only happen on the basis of a neutral platform, thus not coordinated by JRC.</p>
<p>5. Enhance transnational cooperation through a dedicated Research and Innovation partnership on forestry</p>	<p>How would this partnership relate to already existing Partnerships (e.g., Biodiversity, CBE JU, Build4People, Processes4Planet)? It is however important to strengthen the trans-national research networks.</p> <p>Under this envisaged framework, the Strategic Research &amp; Innovation Agenda from the Forest-based Sector Technology Platform, that targets to help the EU to reach</p>

	the targets of the EU Green Deal should guide the EU and forest owners in all regions of the EU
6. Develop a "Planning our Future Forest" research and innovation agenda including: research and forecast of challenges affecting forest in light of climate change, the innovation needs for instance species need as well as piloting and testing of adaptive and resilience enhancing forest management approaches	It is not clear if the Commission is aware that foresters and forest owners, together with other stakeholders of the European forest-based value chain, have agreed on a European Strategic Research & Innovation Agenda (FTP SIRA 2030), managed under the umbrella of the Forest-based Sector Technology Platform, which is a non-profit, international association. This agenda covers all aspects of R&D&I on forests, forestry and forest-based industries. Any new research and innovation agenda must build on and be harmonized with this key document. Where should the testing areas be allocated; how useful is it to arrange for such an approach on EU level, if the influencing factors (soil, topography, precipitation ; socio-economic systems etc.) are so divers between and within Member States Again, under this envisaged planning, FTP SIRA 2030 and the Forest-based Sector should play a key role
7. Develop a Citizens' science Programme for forest biodiversity, notably engaging citizens and civil society in monitoring forest biodiversity	Almost the same wording appears in the EU Biodiversity strategy post 2020 and it was officially clarified by DG Environment that the proposed surveillance approach was a misunderstanding. We are wondering why it is now coming back as a slightly different wording in the EUFS post 2020. What can be expected from a programme that wants to enable laymen to judge complex ecosystem conditions? Is the objective of such a measure to establish a name and shame culture in rural areas?
<b>Chapter 6 inclusive and coherent EU governance framework</b>	<b>Comments</b>
1. the Commission will propose an updated governance that brings these three groups together into a single expert group, with a mandate reflecting all the environmental, social and economic objectives of the new EU Forest Strategy and membership ensuring that multiple Member State representatives from different Ministries are members of this group.	Is it for the Commission to choose among the different national Ministries who should be involved in the discussion on forest-related questions? Justification is missing on this proposed change, in particular the reason why the Commission has not consulted at all the existing Standing Forestry Committee during the preparation process of the forest strategy
2 The Commission will take a similar approach and build on the experience of the existing Civil Dialogue Group on Forestry and Cork and the Working Group on Forest	Why would the mission of a possibly new group be focused only on the implementation of the EU forest strategy whereas there are so many EU forest related policies which have direct impacts on the forest sector? Is there a willingness

<p>and Nature, creating one group with a revised mission statement, broader membership and focus on the implementation of the new EU Forest Strategy</p>	<p>from the Commission to dilute the representativeness of forest owners and managers in a possible new group, compared to the ongoing CDG “forestry and cork”?</p> <p>When it comes to stakeholders group, those who are ultimately carrying the responsibility, administrative burden and costs of policies should be given the voice they deserve to have</p>
<p><b>Chapter 7 Stepping up implementation of existing EU acquis</b></p>	<p><b>Comments</b></p>
<p>1 The Habitats[1] and Birds[2] Directives provide for the conservation of a good range of forest habitats and of forests-related animal and plant species</p>	<p>The directives do not sufficiently address climate change impacts. Management restrictions that are implied through the implementation of these directives might hinder management necessary management actions to adapt forest and support their resilience</p>