

EU BIODIVERSITY STRATEGY TO 2030

COMMENT BY THE CONFEDERATION OF EUROPEAN FOREST OWNERS (CEPF)

CEPF welcomes the European Commission's (EC) initiative to publish the EU Biodiversity Strategy to 2030 as part of the European Green Deal. European forests produce at least 15 different ecosystem services, beneficial to our environment, economy and social life, biodiversity preservation being one of them. To ensure the delivery of all of them, a holistic approach, based on active and sustainable forest management (SFM) principles, is needed. The EU Forest Strategy post-2020 should remain the key policy tool in this view.

In substance our concerns relate to:

- **Active involvement of forest owners** at all levels is the key enabler for biodiversity conservation.
- **The evaluation of the Biodiversity Strategy to 2020** should disclose successes and analyse the implementation gaps to support any new targets and elaborate on ways to achieve them.
- **Thorough assessment of the economic, environment and social impacts** is needed before setting any measures that would impact EU forests.
- **Respect of the ownership rights is of key importance** and should be considered when developing future policy measures related to forests.
- **The strategy should be based on science-based approach** and the forest sector is willing to contribute to science-based processes.
- **Increased coherence between cross-cutting EU policies related to forests** is crucial to ensure good coordination and enhance synergies. Any proposed measures on the biodiversity should be consistent with effective actions on climate change mitigation.
- **The promotion and support of SFM in the EU** is key to further enhance biodiversity and is consistent with worldwide Sustainable Development Goals as well as the goals of the Paris Agreement.

In our view, some more concrete topics can be best addressed in the following way:

- **Better implementation and enforcement** of existing nature legislation including Natura 2000 designated sites should be enhanced before considering new legislation. Better implementation should be based on participatory planning and management.
- **EU forests restoration actions**, if foreseen, require comprehensively defined baseline and focus areas and should be addressed under the EU Forest Strategy. Such actions should focus on areas impacted by natural disturbances and current protected areas.
- **Actions related to forest management practices**, e.g.: close to nature, if foreseen, require clarity in terms of definition and objectives and should be based on existing approaches and expertise in forest management. The EU Forest Strategy should be the key policy tool to address the matter.
- **Afforestation actions**, if foreseen, should be based on existing practices and guidelines (e.g. Forest Europe). The EU Forest Strategy should be the key policy tool to address the matter.
- **Certainty of definitions of e.g. primary and old growth forests** should be guaranteed before any further step is taken. New possible definitions should be clear, workable and based on the internationally agreed and available definitions.
- **Reduced forest fragmentation by reconnecting forests**, if foreseen, requires clarity on the goal and the viewpoint from which the fragmentation should be defined.
- **Forest Information System for Europe (FISE)** should remain under the umbrella of the EU Forest Strategy to ensure a holistic overview.

- **Climate adaptation and mitigation actions** should be closely linked with the New Climate adaptation strategy to support the adaptation of forest management practices for forest resilience in changing climatic conditions and to enable increased carbon sequestration that will enable more raw material to substitute carbon intensive material and energy.

European forest owners are committed to support the future EU biodiversity goals and hope our considerations will be taken into account when developing the future initiatives on the EU biodiversity.

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