



To:

Mr Maroš Šefčovič, Vice-President of the European Commission  
Mr Jyrki Katainen, Vice-President of the European Commission  
Mr Miguel Arias Cañete, Commissioner for Climate Action and Energy  
Mr Phil Hogan, Commissioner for Agriculture and Rural Development  
Mr Karmenu Vella, Commissioner for Environment and Maritime Affairs  
Ms Cecilia Malmström, Commissioner for Trade  
Ms Margrethe Vestager, Commissioner for Competition

Cc:

Mr Alexander Italianer, Secretary General of the European Commission  
Mr Jean-Eric Paquet, Deputy Secretary-General of the European Commission

**Subject: Call for recognition of the climate benefits of sustainable forest management and use of wood in the EU**

Dear Vice-Presidents,  
Dear Commissioners,

Brussels, 24 October 2016

In the EU, forest area expanded significantly as Finland and Sweden joined the Union in 1995. As representatives of the Nordic forest owners we would like to draw your attention to the positive climate benefits of active and sustainable forest management and use of domestic wood in the EU.

In Nordic countries, forests have been managed according to the principles of sustainable forest management ensuring continuous growth of this resource. Due to prominent investments in forest management practices, the forest area and volume in Nordic countries has been steady increasing since 1970s. Parallel development can be seen in the EU where the forest area has increased by 7 % since 1990.

Unfortunately, and as stated in the EU Bioeconomy Strategy<sup>[i]</sup>, the European economy still rely heavily on fossil resources making it vulnerable to insecure and dwindling supplies and market volatile. To remain competitive, the EU needs to become a low carbon society where resources are used efficiently and bio-based products and bioenergy contribute to green growth and competitiveness. In order to fully implement this transition forests and forest-based products should be fully recognised as the backbone of the low carbon economy.

Due to increasing political pressure towards European forests from different EU policies and de facto that forest policy remains a national member states competency, we would like to ensure that the political framework at EU level strengthens the competency of forest owners and forestry sector. In order to tap the full mitigation potential of forests also in the future, the EU's climate and energy policy must recognise, as already recognised in the EU Forest Strategy<sup>[ii]</sup>, in the IPCC 5th Impact Assessment report<sup>[iii]</sup> and in the Paris Agreement, that active and sustainable forest management and use of wood-based products are effective means to mitigate climate change. Setting aside forests from sustainable forest management with the objective of preserving a certain carbon pool is not an option. In the EU, a correlation between using the forest and having a large forest carbon sink can be seen and there is significant potential to sustainably increase harvest levels<sup>[iv]</sup>.

Regarding the upcoming policy on solid biomass sustainability and due to the fact that biomass for energy is largely a domestic energy source, already regulated under various policies and strict silvicultural guidelines, the Nordic Family Forest Owners asks the Commission to thoroughly consider where value-added can be achieved with a new bioenergy policy. A right balance must be kept in mind whilst considering imports vis-à-vis domestic production since the policy will mainly impact EU actors, including forest owners and managers and new costs and burdens may negatively impact the whole sector and subsequently society at large.

Thank you for taking our concerns into consideration. We remain at your disposal for further discussions.

Yours sincerely,



Juha Marttila  
President  
The Central Union of Agricultural  
Producers and Forest Owners (MTK)



Sven Erik Hammar  
Vice-Chairman  
The Federation of Swedish Farmers (LRF)



Niels Iuel Reventlow  
Head of the Board  
Danish Forest Association



Olav V. Veum  
Head of the Board  
Norwegian Forest Owners' Federation

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<sup>[i]</sup> COM(2012) 60 final – Innovating for sustainable growth: A Bioeconomy for Europe

<sup>[ii]</sup> COM(2013) 659 final – A new EU Forest Strategy: for forests and forest-based sector

<sup>[iii]</sup> [http://www.ipcc.ch/pdf/assessment-report/ar5/syr/AR5\\_SYR\\_FINAL\\_SPM.pdf](http://www.ipcc.ch/pdf/assessment-report/ar5/syr/AR5_SYR_FINAL_SPM.pdf)

<sup>[iv]</sup> Nabuurs et al. (2015). A new role of forests and the forest sector in the EU post-2020 climate targets. From Science to Policy 2. European Forest Institute.