



Comments on Roadmap for Protecting Biodiversity: Nature Restoration Targets Under the EU Biodiversity Strategy. December 2, 2020

The Forest Defenders Alliance (forestdefenders.eu) is an initiative to amplify voices of NGO's working on forests and climate. Thank you for the opportunity to comment on the roadmap for nature restoration targets under the Biodiversity Strategy. While EU nature restoration should obviously address all habitat types, our comments focus mainly on forests.

We appreciate the direction the consultation appears to be headed. However, we have significant concerns about the ability to set and deliver targets, given the EU's ongoing commitment to business as usual in the forest sector. Consultation after consultation contains the same promises – that forests will be preserved and restored, that all will be done in full respect of ecological principles. Yet at the same time, the consultations promise that an increasing share of fossil fuels and other carbon-intensive products will be replaced by wood. Troublingly, there seems to be little science backing up the claims that replacing such materials with wood will decrease emissions (and much science to the contrary – including an important new paper that essentially dismantles the idea that substitution effects offer any meaningful climate mitigation¹). Even more fundamentally, however, there is rarely any acknowledgement of the basic, obvious contradiction between wanting to save forests from the ravages of exploitation that have brought many ecosystems and biodiversity to the brink of collapse, but on the other hand, wanting to *increase* forest logging to feed the “bioeconomy.”

We are also apprehensive about EU policymakers' faith in the vague and undefined concepts of “sustainability” and “sustainable forest management.” We went looking for a definition of “sustainability” in the forestry context. One EU webpage² defined it thus:

"The stewardship and use of forest lands in a way and at a rate that maintains their productivity, biodiversity, productivity, regeneration capacity, vitality and their potential to fulfil now and in the future relevant ecological, economic and social functions at local, national and global levels and that does not cause damage to other ecosystems."

However, we've yet to see an admission anywhere that forest management as it now occurs is *not* “sustainable.” Apparently everyone defines their current forestry as sustainable. But if that is true, then why are EU forests in such terrible shape? We suggest defining sustainability in a concrete manner, with concepts that are defined and quantifiable.

There must be a far greater willingness to let ecosystems alone. The European Environment Agency's (EEA) assessment demonstrates that only a small part of EU forests – 15% - is in a favourable status, and their condition is deteriorating³. Healthy forests existed for millennia before human intervention, yet it seems that some people still believe that managed forests are inherently better than natural forests, and that we must “cut the forest to save it.” There is little acknowledgement of the scale of change that will be required – including in consumption – if we want to save forests and improve their status.

To see genuine ecosystem restoration, we support legally mandated nature restoration targets – voluntary targets will never be met, as previous examples, for instance for cars'

emissions, have demonstrated. Forests and other ecosystems need genuine, enforceable protections. Such a target and joint effort of Member States to improve ecosystem integrity and resilience are urgently needed in the EU. We further urge that the policy set a separate target for forests, given the central role they are expected to play in sequestering carbon and helping the EU meet its climate goals. Within the forest target should be additional goal that habitats within the Natura 2000 / protected area network be restored to a favourable conservation status.

The roadmap document rightly states that the current potential of ecosystems to deliver various ecosystem services and functions is equal to or lower than the baseline value for 2010. The loss of essential ecosystem services results in reducing the natural function to sequester and store carbon as well as ecosystems' capacity to contribute to climate change adaptation by reducing flooding or acting as coastal buffers.

The drivers of ecosystem degradation must be noted: over exploitation including timber removal, including for an increasing amount of fuel; climate change accelerated by human activities; air and water pollution; invasive species and development projects. Real change requires addressing these. Removing incentives for logging forests for biomass fuel would be a big step in the right direction, since about half the wood logged in the EU is currently used for fuel.

Why restoration is urgently needed

Immediate large scale ecosystem restoration is needed for biodiversity, since local extinction of species can occur with a substantial delay following habitat loss or degradation.⁴ Accumulating evidence suggests that such “extinction debts” pose a significant but often unrecognized challenge for biodiversity conservation across a wide range of taxa and ecosystems. The extinction debt happens because there is a time lag between habitat loss or degradation and the disappearance of the species. Therefore, the ongoing degradation of habitats in Europe is a very worrying signal for the future of its biodiversity.

The need for of restoration is urgent in relation to forest habitats at the most basic level, as demonstrated for instance by the status of Saproxylis beetles. These species are insects that depend on dead and decaying wood for at least part of their lifecycle, and play an important nutrient and energy processing role in European forests. According to the European Red List of saproxylis beetles (IUCN, 2018⁵). More than one-fifth of Saproxylis beetles are considered threatened in the EU, indicating that ecosystem degradation is reaching down into the most foundational levels of ecosystem function. It will be important to link the restoration targets to the Habitat Directive, which lists natural habitat types of community interest in Annex 1⁶. There is still time for conservation measures such as habitat restoration and landscape management, as long as a species that is predicted to become extinct still persists. Such efforts would be immeasurably strengthened if legally binding targets are set up for Member States.

Importantly, the process should consider all relevant legislation, particularly the legislation that drives ecosystem degradation. The Renewable Energy Directive deserves particular scrutiny as it contributes to increased forest destruction by promoting forest biomass as a zero carbon renewable energy source (Booth and Mitchell, 2020⁷).

The main expectation from the EU restoration target

The EU nature restoration target should lead to a paradigm shift in land use strategies and strive for change in political will to help shift ecological baselines towards recovering fully functioning ecosystems. Society will no longer accept degraded ecosystems and over-exploitation of nature as the baseline for each successive future generation. The future restored ecosystems should not only deliver biodiversity benefits, but must be more climate resilient. This change in paradigm will also help to create new sustainable economic opportunities, delivering the best outcomes for nature and people.

Recommendations for the Restoration of EU's forests

As mentioned, only 15% of habitat types and 26% of forest dwelling species have a favourable conservation status. This indicates the urgent need for restoring forest habitat types.

Restoration must include the process to address the drivers threatening our forests:

- There is too much logging as indicated by a recent research of the EU Joint Research Centre⁸ and this logging will likely further increase due to the promotion of use of wood as a replacement for an even wider range of carbon-intensive products. There is a significant failure to address overconsumption by our society
- The Renewable Energy Directive increases pressure on our forests as it falsely considers forest biomass as a zero carbon renewable energy source⁹¹⁰

Without addressing these two pressures, the restoration of forest habitats will not be possible in Europe.

However, all of the earlier points could be easily translated to management actions in relation to forest habitats, which – as biodiversity and carbon rich ecosystems – are of particular interest for restoration.

The EU restoration targets should utilise the following suggested tools in relation to forest ecosystems:

- Pro-forestation (allowing natural forests to grow older and larger, and re-naturalising plantation forests, Moomaw et al 2019¹¹), as recognised by the European Parliament report on the EU's role in protecting and restoring the world's forests¹², is the quickest way to recover biodiversity, resiliency, ecosystem integrity and stable, long-lived carbon stocks in forests.
- Increase and restore connectivity between blocks of older and aging forests to integrate climate and biodiversity action. Reforestation can play a role, but must focus on re-establishing natural forests.
- Afforestation (planting forests in non-forest biomes), which the EC suggests should be biodiversity-friendly, should only be contemplated if needed to improve ecological connectivity between strictly protected areas and improve landscape scale resilience. It must promote planting of mixed native species, not monoculture plantations.
- Afforestation / reforestation must respect human rights, the need to conserve a range of ecosystem types and the need for land use management to supply food and fibre.
- In order to incentivise forest restoration, new mechanisms for payment for ecosystem services (PES) must be developed, which can help adding more value to nature conservation protection as a valid forest management choice (whenever necessary the PES could be replaced or paralleled with compensation payments for private land owners). These can eventually help increasing carbon stock in forests and health of forest ecosystems.

While multiple strategies will be needed to address global environmental crises, restoration of biodiversity and carbon-rich ecosystems, especially forests, is a very low-cost option for increasing carbon sequestration that does not require additional land beyond what is already forested. As observed by Griscom et al¹³ in their important “Natural Climate Solutions” paper, infilling and increasing the carbon density in existing forests is a primary way to sequester more CO₂. This approach can also provide forest related jobs and opportunities along with a wide array of quantifiable ecosystem services, including human health.

Finally, the following forest principles should be considered for the EU nature restoration target as management guidance:

1. Climate mitigation and biodiversity values are intertwined.
2. Forest ecosystems as natural habitats are self-sustaining, and do not require active human management.
3. The higher a forest’s level of ecosystem integrity, the greater its stability, resilience, and resistance to threats, and the greater its climate mitigation benefit and adaptive capacity.

Nature-based Solutions

The UNFCCC COP 25 in Madrid called for integrated action to prevent biodiversity loss and climate change, a sign that the world is increasingly looking for integrated solutions to the biodiversity and climate crises. The European Parliament in its report adopted on 16 September¹⁴ recognised that “in order to limit global warming and help tackle biodiversity loss, it is essential that forests are protected, restored and managed in such a way as to maximise their capacity for carbon storage and biodiversity protection.”

Developing integrated climate and biodiversity solutions is as important for Europe as it is for developing countries. Allowing and encouraging European forests to reach their biological potential through restoration and rewilding efforts would make an enormous difference at scale to tackling both crises and offers a low-cost Nature-based Solution¹⁵. More strict protection, pro-forestation and less logging pressure on forests in the EU and beyond will provide integrated benefits and play a meaningful role in achieving “net zero” targets by 2050. Protecting existing forest carbon stocks and increasing forest carbon uptake will increase the land sector carbon sink and contribute to reversing the biodiversity crisis.

¹ Leturcq, Philippe. 2020. "GHG displacement factors of harvested wood products: the myth of substitution." *Scientific Reports* 10 (1):20752. At: <https://doi.org/10.1038/s41598-020-77527-8>.

² https://ec.europa.eu/growth/sectors/raw-materials/industries/forest-based/sustainable-forest-management_en

³ <https://www.eea.europa.eu/publications/state-of-nature-in-the-eu-2020>

⁴ [https://www.cell.com/trends/ecology-evolution/fulltext/S0169-5347\(09\)00191-8?_returnURL=https%3A%2F%2Flinkinghub.elsevier.com%2Fretrieve%2Fpii%2FS0169534709001918%3Fshowall%3Dtrue](https://www.cell.com/trends/ecology-evolution/fulltext/S0169-5347(09)00191-8?_returnURL=https%3A%2F%2Flinkinghub.elsevier.com%2Fretrieve%2Fpii%2FS0169534709001918%3Fshowall%3Dtrue)

⁵ <https://portals.iucn.org/library/sites/library/files/documents/RL-4-023.pdf>

⁶ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:01992L0043-20130701>

⁷ <http://www.pfpi.net/paper-tiger-report-shows-new-eu-biomass-rules-greenlight-increased-forest-destruction>

⁸ <https://www.nature.com/articles/s41586-020-2438-y>

⁹ <https://environmentalpaper.org/the-biomass-delusion/>

¹⁰ <https://amser.org/index.php?P=AMSER--ResourceFrame&resourceId=1225>

¹¹ <https://www.frontiersin.org/articles/10.3389/ffgc.2019.00027/full>

¹² https://www.europarl.europa.eu/doceo/document/TA-9-2020-0212_EN.html

¹³ Griscom, Bronson W., et al. 2017. "Natural climate solutions." Proceedings of the National Academy of Sciences 114 (44):11645-11650. At: <http://www.pnas.org/content/114/44/11645.abstract>.

¹⁴ https://www.europarl.europa.eu/doceo/document/TA-9-2020-0212_EN.html

¹⁵ <https://www.iucn.org/theme/nature-based-solutions>