



Reforming EU policy for forest and climate restoration

Position paper from the Forest Defenders Alliance

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The EU’s incoherent approach to forests

Europe’s forest ecosystems are unravelling: only 14% of assessed forests have a favourable conservation status,¹ and carbon uptake by EU forests is declining and projected to decline further.²

¹ EEA (2020), State of Nature in the EU <https://www.eea.europa.eu/publications/state-of-nature-in-the-eu-2020>

Yet at the same time, increased forest carbon uptake is needed to help achieve the EU's 2030 climate target of reducing GHG emissions 55% below 1990 levels, as the EU's new approach will count land sector carbon uptake toward emission reduction goals.

This fundamental incompatibility between actual forest condition and policy imperatives is directly attributable to an incoherent approach in EU policy that privileges short term gains such as timber harvesting above the holistic ecosystem services that forests provide.

To reverse the catastrophic decline in forest condition now underway and embark on forest restoration for biodiversity and the climate, the EU must take serious and urgent action. While such action from the top is historically opposed by the member states that consider forest policy their purview, the EU has the competence to legislate on forests, as confirmed by a judgment of the EU Court of Justice in 1999 that recognizes EU authority for environmental policy in forests based on Article 191 of the Lisbon Treaty. The EU has a long history of contributing to Member States' decisions on forests through its policies and legislation (for instance, based on Art 43 and 191 of TFEU³).

Even before engaging in any battle over subsidiarity, however, some EU policies damaging to forests could be significantly reformed "*in situ*" without perceived encroachment on Member State policy prerogatives by simply removing perverse incentives. That is the main topic of this paper.

To provide overarching guidance for new, more nature-centric policies, the EU has advanced the Biodiversity Strategy (BDS) as the framework for other policies that "*addresses the five main drivers of biodiversity loss, sets out an enhanced governance framework to fill remaining gaps, ensures the full implementation of EU legislation, and pulls together all existing efforts.*"

The BDS recognizes the immense value of primary and old-growth forests for biodiversity and carbon sequestration, both in Europe and around the world, and calls for a reduction in harvesting pressure on forests overall. Specific forest-related measures include goals to legally protect at least 30% of the EU's land area, implement a Trans-European Nature Network of ecological corridors, and strictly protect at least one third of existing EU protected areas. Additional noteworthy proposals include planting at least 3 billion more trees across the EU by 2030; issuing a new but related EU Forest Strategy as well as biodiversity-friendly afforestation and reforestation guidelines and closer-to-nature forestry practices; proposing an EU Nature Restoration Plan for biodiversity recovery by 2030; and implementing measures to curb the availability of products associated with forest deforestation and degradation on the EU market. Also important is the EU's stated pledge to advocate for similar forest-protecting measures on the world stage and to refrain from actions leading to deforestation outside EU borders.

The BDS is not perfect – it is infected with some of the traditional thinking on forests that has led to the current catastrophic situation the EU faces now, in particular a misplaced faith in the vague

² While carbon dioxide (CO₂) uptake by the EU land sector as a whole removed around 7% of total EU emissions in 2015 (about 300 million tonnes (Mt) CO₂-equivalent), the same land area is projected to remove 40% less CO₂e in 2030. EEA Indicator Assessment, Total greenhouse gas emission trends and projections in Europe 2019, at <https://www.eea.europa.eu/data-and-maps/indicators/greenhouse-gas-emission-trends-6>

³ Treaty on the Functioning of the European Union (TFEU), at https://eur-lex.europa.eu/resource.html?uri=cellar:2bf140bf-a3f8-4ab2-b506-fd71826e6da6.0023.02/DOC_2&format=PDF Article 43 looks at decision making for the Common Agricultural Policy (CAP), 191 at EU policies on the environment.

concept of “sustainability” (as discussed below). Nonetheless, forest condition could improve if EU policies and financial incentives were aligned with the goals of the BDS. Below we offer some general recommendations.

The EU won't hit climate targets without a massive increase in the forest carbon sink

Achieving the 2050 carbon neutrality target will require both sharp emission reductions and a tremendous increase in the carbon sink. Essentially, the EU must cut emissions in half in the next ten years to be on the right path. The EU's forests have significant climate mitigation potential; for instance, a recent study by Greenpeace⁴ found that forest carbon uptake could be doubled in the next thirty years if harvesting rates were reduced by one-third to reduce the felling-to-increment ratio⁵ to 50%, and forests were managed with a close-to-nature approach. The trend is currently going in the opposite direction, however. The EU's Joint Research Centre (JRC) reports an increase in harvesting intensity between 2009 and 2015, with the felling-to-increment level in the range of 75% to 85%,⁶ and unfortunately, certain of the EU's policies that are intended to help mitigate climate change are or will be directly responsible for undermining emissions. In particular, the Renewable Energy Directive (RED), which encourages harvesting forests for fuel, and the LULUCF Regulation, which anticipates – and even encourages – a loss in the forest carbon sink.

The LULUCF Regulation clearly and rightly states that “*as removals through LULUCF are reversible, they should be treated as a separate pillar in the Union climate policy framework.*” Recognizing that previous baseline approaches for valuing land sector carbon, e.g. under the Kyoto Protocol, were subject to gaming, the Regulation employs a forest reference level (FRL) approach that is supposed to provide more objective criteria for baseline development.

⁴ Greenpeace. 2020. The Future of Forests in the European Union - Untapped potential for nature conservation and climate change mitigation. Hamburg, Germany. https://www.greenpeace.org/static/planet4-eu-unit-stateless/dc958adf-20201203_greenpeace_future_of_forests_in_the_eu.pdf.

⁵ The felling-to-increment ratio is the amount of forest growth in a year that is harvested. It is generally accepted that as long as this ratio is less than one, then forestry is “sustainable.” As discussed in this paper, the concept of “sustainability” is not relevant for determining the net carbon impact of using wood for long-lived materials or fuel.

⁶ Camia, A., et al. 2021. The use of woody biomass for energy production in the EU Publications Office of the European Union, Luxembourg: Joint Research Centre. <https://forestdefenders.eu/wp-content/uploads/2021/01/JRC-biomass-report-markup.pdf>.

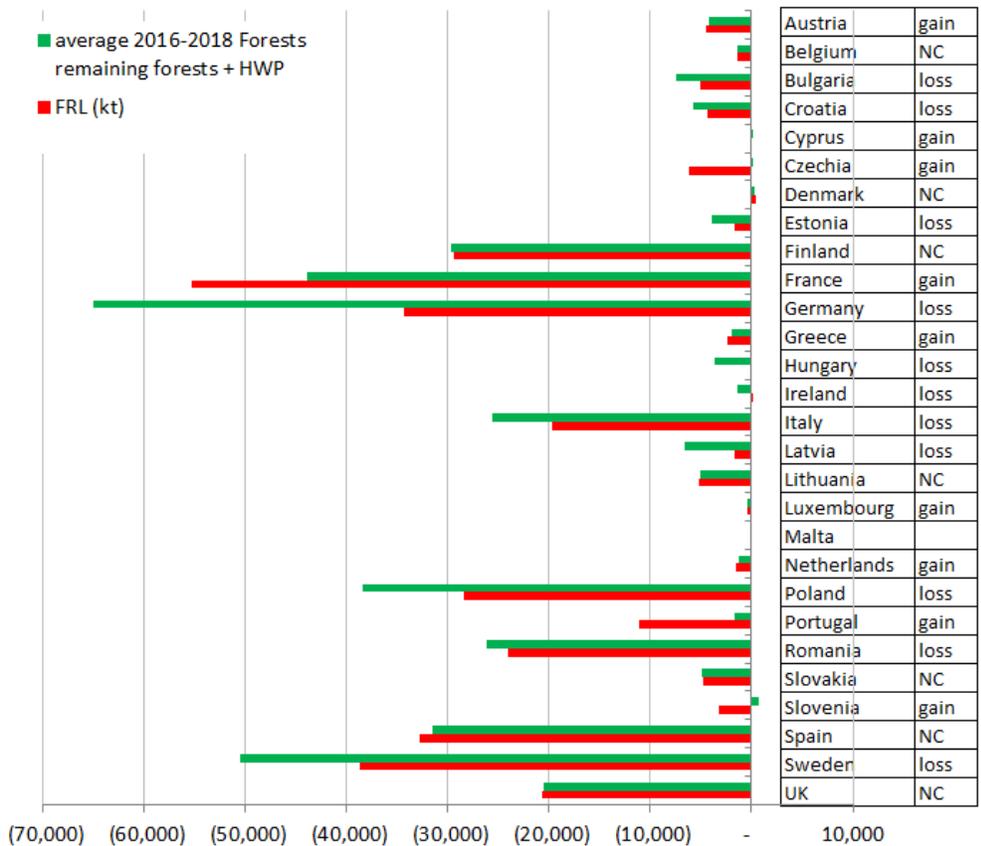


Figure 1. FRL levels compared to average CO₂ uptake for 2016-2018 for each member state, with qualitative gain, loss, or no change (NC) when the FRL is less than 5% different from the 2016-2018 average.⁷ The axis is in units of kilotonnes. HWP stands for “harvested wood products,” which are grouped with managed forests in the assessment of forest carbon conducted for the FRLs.

However, by setting the baselines as a projection into the future of past harvesting practices, by definition, the FRLs “aim at” a decreased carbon sink – not the increase that is needed.⁹ Further, many subjective elements persist in the baselines; for instance, countries can define forest management intensity,¹⁰ a key parameter for establishing reference levels, in differing ways, as the Commission has identified seven differing interpretations.¹¹ The predictable consequence is that the member state FRLs published in 2020 project a significant decline in forest carbon uptake or the 2021-2026 period¹² (Figure 1). Half of member states project a reduction in their forest sink

⁷ Data on the 2016-2018 forest sink was obtained at <https://unfccc.int/ghg-inventories-annex-i-parties/2020>, using common reporting format for the UNFCCC to obtain data on the categories of “forest land remaining forest land” and “harvested wood products” but not “land converted to forest land.”

⁸ The JRC (Camia et al 2021) says, “The LULUCF sector (Regulation 2018/841), therefore, aims at reaching a certain future level of the forest sink (the projected Forest Reference Level, FRL).”

⁹ For more information on the forest reference levels, see <http://www.pfpi.net/wp-content/uploads/2020/10/PFPI-comments-on-draft-delgated-act-for-FRLs-Sept-14-2020.pdf>

¹⁰ National forestry accounting plans include information on the forest management intensity and information on how harvesting rates are expected to develop under different policy scenarios. (LULUCF Regulation Annex IV B) Article 8(5) refers to forest management intensity as a ‘core element’ of sustainable forest management practice.

¹¹ https://www.sll.fi/app/uploads/2020/06/Letter-Sinkevicius-and-Timmermans_LULUCF_Final-for-sending.pdf

¹² https://ec.europa.eu/clima/sites/clima/files/forests/lulucf/docs/frl_proposed_by_ms_en.pdf

relative to the 2016-2018 average, and the majority of these plan to reduce their sink by 20% or more. Collectively, the EU's forest sink is projected to decline by 11% compared to the average forest sink from 2016 to 2018.

Viewed in the context of historical data from 1990, the loss of the sink is even more drastic (Figure 2). The trend is partially a function of harvesting, partially a function of plantation forests aging and slowing their carbon sequestration, and partially a function of climate, pest, and pathogen stress, all of which are common in low biodiversity forests managed for wood products. Overall, this is a serious indictment of EU forest management as a whole.

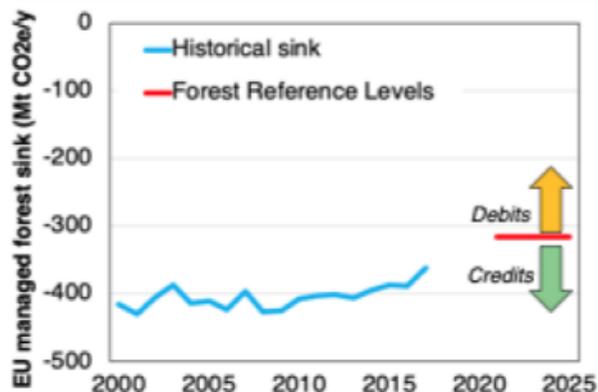


Figure 2. The cumulative FRL for the EU compared to the historic managed forest carbon sink, as excerpted from the recent JRC report on biomass.¹³

A serious deficit in the LULUCF Regulation is its interaction with the RED and the cover it provides to the false conception that burning forest biomass is climate-beneficial. Bioenergy apologists are quick to point out that although biomass is counted as having “zero” biogenic carbon emissions in the energy sector, the loss of carbon will be recorded in the land sector once accounting under the LULUCF Regulation is underway.¹⁴ However, this is only partially correct, because the baseline period for the FRLs (2000 – 2009) saw an increasing level of forest biomass use, thus the FRLs themselves “bake in” a great deal of wood-burning for energy that is effectively thus treated as zero in the land sector, as well as the energy sector. Additionally, the upward tilt of most of the member state FRLs, indicating a loss of the forest carbon sink, each year provides more “headroom” for wood-burning that is counted as having zero emissions.

Recommendation: Revise the LULUCF Regulation and eliminate the FRLs

The EU's new climate target of a 55% emissions reduction compared to 1990 levels will include land sector carbon uptake. To better value and incentivize carbon uptake in the land sector, the JRC has recommended a new approach that would simply assess present-day emissions-plus-land-removals against the same metric in 1990, and thus obviate the need for the complex

¹³ Camia, A., et al. 2021. The use of woody biomass for energy production in the EU Publications Office of the European Union, Luxembourg: Joint Research Centre. <https://forestdefenders.eu/wp-content/uploads/2021/01/JRC-biomass-report-markup.pdf>.

¹⁴ Booth, Mary S, and Ben Mitchell. 2020. Paper Tiger: Why the RED II biomass sustainability criteria fail forests and the climate. Pelham, MA: Partnership for Policy Integrity. <http://eubiomasscase.org/wp-content/uploads/2020/07/RED-II-biomass-Paper-Tiger-July-6-2020.pdf>.

accounting framework of the FRLs. The advantages include better accounting for forest carbon loss from bioenergy increases since 1990:

“First, this would represent a step towards the EU 2050 climate neutrality target, where the full size of LULUCF emissions and removals will be counted, because this is what ultimately matters for the atmosphere. Second, treating the LULUCF sector like any other sector from 2030 would introduce an important simplification of the LULUCF jargon, facilitate communication (i.e. it would be more evident that all the carbon impact of bioenergy is accounted for) and thus bring more transparency also in the accounting of forest bioenergy emissions.”¹⁵

Under the somewhat fiendishly complicated terminology of land sector carbon accounting, this would be considered “net-net” accounting, whereby emissions and removals from the land sector are counted in both the base year and in the commitment period.¹⁶

Recommendation: Keep land sector targets separate and do not allow specific offsetting

While simplifying carbon accounting as described above would bring a number of advantages, it does run the risk of reducing the relative “ambition” of emissions reduction goals. Under the FRL approach, member states can only generate carbon credits from forests if their forest carbon sink is stronger (i.e., more negative) than what would have occurred under the business-as-usual projected baseline, meaning most of the forest sink is not counted as a credit that the country can use to offset emissions in other sectors. If the system were changed to count the whole land sink each year, and then if member states were allowed to use those credits to offset emissions, this would provide a windfall offset that would not require member states doing anything additional. Accordingly, many in the climate science and advocacy community want to see the EU set separate, *non-fungible* targets for emission reductions in the Effort Sharing and Emissions Trading sectors, and targets for carbon sequestration increases in the LULUCF sector. Land sector carbon uptake must not be considered an “offset” that enables less ambition in the other sectors. Land-sector targets must be aggressive, and they should promote forest protection, restoration, and re-naturalization of plantation forests.

Recommendation: Adopt binding objectives for natural ecosystems restoration

The Biodiversity Strategy proposes to develop an ambitious EU Nature Restoration Plan covering at least 30% of land and sea, with strict protection for at least 10% of land. Since forests are disproportionately important, the plan should strictly protect at least 15% of Europe’s and ensure these are surrounded by appropriate buffers and guaranteed connectivity to other protected areas. Other natural and semi-natural forests under active management must have more biodiversity and climate friendly management practices, and quantifiable metrics must be used to ensure that targets are achieved.

Storing more carbon in forests means reducing logging, not increasing it

The EU needs policies that encourage growing forests, not cutting them. However, policies and attitudes that promote intensive exploitation of forests still have the most momentum. For

¹⁵ Camia et al, 2021.

¹⁶ See page 3 at <https://climateanalytics.org/media/lulucfguide.pdf>

instance, while a 2020 consultation for the new Forest Strategy indicated a more holistic treatment of forests than in the past, it also emphasized in the absence of clear scientific evidence that forests will increasingly be called upon to replace GHG-intensive products in construction, chemistry, and energy, suggesting the new Forest Strategy will promote an *intensification* of logging. The European Parliament’s own report on the Forest Strategy also takes an aggressive pro-harvesting stance which unabashedly trumpets conventional forest industry talking points that “*managed commercial forests not only bind carbon better than unmanaged forests but also reduce emissions and problems caused by deterioration of the condition of forests*” and, “*sustainable management of commercial forests has the very best impact on the climate.*”¹⁷ While some forest management practices are undoubtedly more climate-friendly than others, it is not the case that managed forests “reduce emissions”; logging degrades both aboveground and belowground carbon stocks and the majority of harvested wood enters the atmosphere in a relatively short time. In contrast, natural forests continue to be active carbon sinks for centuries,¹⁸ building stocks of aboveground and belowground biomass and soil organic carbon alike.

The Joint Research Centre has identified forest biomass harvesting as a prime driver of increasing logging. Currently, the majority of wood harvested in EU forests¹⁹ is almost instantly returned to the atmosphere as CO₂ because it is burned as firewood, chips or pellets in residential units, industrial biomass boilers, and power plants. The EU’s Renewable Energy Directive and Emissions Trading System encourage burning wood as fuel, treating it as zero carbon and making it eligible for subsidies and relief from carbon fees. EU appetite for wood pellets is driving logging in EU member states such as Estonia, and also in countries outside the EU including Canada and the United States.

While the Biodiversity Strategy calls for a reduction in the “*use of whole trees and food and feed crops for energy production – whether produced in the EU or imported,*” the recent JRC report on biomass²⁰ (as called for by the BDS) presents a clear indictment of the ecosystem and emission impacts of burning all forest wood. The report evaluated 24 bioenergy feedstock scenarios, affirming findings of many other studies that burning even forest “residues” has significant carbon costs. Even under the best case scenario, burning forestry residues can increase emissions compared to fossil fuels for 10 – 20 years, while other scenarios increase emissions for several decades to centuries. Nearly every scenario the JRC evaluated was associated with detrimental impacts on biodiversity and forest ecosystem function ranging from soil nutrient and carbon loss to species loss.

Similar threats to forests will arise from policies that promote the “bio-economy” and the replacement of GHG-intensive products with wood. Unfortunately, the 2020 inception impact assessment for the upcoming Forest Strategy indicates much faith that increasing harvested wood products (HWP) will help mitigate climate change when these products displace more carbon-intensive materials such as steel and concrete. However, the science tells another story. First, all logging entails ecosystem damage and carbon loss, and all conversion to HWP comes at far greater forest carbon loss than is actually measured (due to loss of wood that is not converted to

¹⁷ At https://www.europarl.europa.eu/doceo/document/TA-9-2020-0257_EN.pdf

¹⁸ See, e.g., Luyssaert, Sebastiaan, et al. 2008. Old-growth forests as global carbon sinks. *Nature* 455:213. At: <http://dx.doi.org/10.1038/nature07276>; Lutz, James A., et al. 2018. Global importance of large-diameter trees. *Global Ecology and Biogeography* 0 (0):1 - 16. <https://onlinelibrary.wiley.com/doi/abs/10.1111/geb.12747>.

¹⁹ Camia et al 2021.

²⁰ Camia et al 2021.

final product, soil carbon loss, and increasing ecosystem respiration in logged forests, among other factors).²¹ Trying to reduce CO₂ emissions by storing more carbon in wood products is thus like trying to carry water in a leaky bucket. Additionally, the idea that “substitution” effects convey a climate benefit is often predicated on the assumption that wood harvesting is “carbon neutral” as long as net forest growth is positive, but this assumption is false (see section on “sustainability” below). Finally, substituting wood for GHG-intensive materials only produces a reduction in net emissions if wood use is accompanied by a verifiable global reduction in use of the non-wood material.²²

No amount of tweaking and fiddling around the edges of forest policy, invocations of sustainability and other nice-sounding words will restore forest ecosystems. There simply needs to be a reduction in demand for wood from forests, that, as the Biodiversity Strategy says, “*reduces pressures on habitats and species.*”

Recommendation: Eliminate eligibility of forest biomass in the Renewable Energy Directive

The JRC’s new report on biomass concludes that biomass sourced directly from forests is in general not able to yield carbon benefits within climate-policy-relevant timeframes, and further, that biomass harvesting usually harms ecosystem function, including even fundamental aspects like future tree growth. The RED does not contain any real protections for forests that mitigate these harms – only a set of insufficient sustainability criteria that do not even exempt protected areas from logging.²³ While burning certain mill residues for energy may entail no additional harm to ecosystem function and may have a negligible carbon impact, it is increasingly clear that there are vanishingly few scenarios where removing biomass from forests for fuel is actually “beneficial.” Accordingly, forest biomass should be eliminated from the RED II to remove the incentives that are currently driving accelerated logging for fuel. While this alone would likely do little to reduce use of wood for subsistence residential heating, it would at least remove the incentives that appear to be responsible for a surge in forest harvesting in recent years,²⁴ including a growing amount of “unaccounted wood” as identified by the JRC that was nearly 120 million tonnes in 2015²⁵ and is probably higher now.

Recommendation: Use science to determine climate impacts of the “bio-economy”

EU policymakers responsible for crafting the new Forest Strategy and any other policies having to do with the bio-economy should use scientific analysis (particularly following Kieth et al 2015 and Leturcq, 2020 as cited here) to determine if substituting materials with wood will lead to an actual reduction in emissions. Even if this criterion is met, however, this does not obviate the need to prioritize policies that reduce consumption, since only through reduced consumption can both climate mitigation and ecosystem restoration be achieved.

²¹ Keith, Heather, et al. 2015. "Under What Circumstances Do Wood Products from Native Forests Benefit Climate Change Mitigation?" PLoS ONE 10 (10):e0139640. <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC4593608/>.

²² 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>.

²³ Booth, M. and B. Mitchell. 2020. Paper Tiger: Why the EU’s RED II sustainability criteria fail forests and the climate. Partnership for Policy Integrity. At <http://eubiomasscase.org/wp-content/uploads/2020/07/RED-II-biomass-Paper-Tiger-July-6-2020.pdf>

²⁴ Camia et al 2021.

²⁵ Table 4, Camia et al 2021.

Recommendation: Align incentives with storing forest carbon, not liquidating it

The BDS says “*Natural capital investment, including restoration of carbon-rich habitats and climate-friendly agriculture, is recognised to be among the five most important fiscal recovery policies,*” and calls for environmental costs to be priced in to tax systems. The “polluter pays” principle is a foundational element of the environmental provisions in the Treaty of the Functioning of the EU.²⁶ Yet currently, EU policies allow member states to pay out billions of euros each year to liquidating forests for biomass fuel, instead of restoring them, and the EU’s Emissions Trading System rewards coal plants that switch to burning wood by cancelling their obligation to pay carbon fees. EU policies should be reformed to incentivize protecting and restoring forests, not logging them.

Recommendation: More strictly protected forests, and better care of protected areas

At least 15% of total forest cover in Europe should be strictly protected (meaning no active forest management) to allow the development and restoration of dynamic functioning forest ecosystems that exhibit the full array of species composition and long-lived, stable carbon stocks in plants and soils. This is in line with the BDS, which calls for immediate protection of remaining primary and old-growth forests and strict protection of 10% of EU’s total terrestrial area.

Stop the “Sustainable Forest Management” greenwashing

The concept of “sustainable forest management” (SFM) and other derivations of the word “sustainable” is an overarching concept that is incessantly invoked in EU forest policy, for instance appearing three times in a single sentence in the EU’s consultation “roadmap” for the new forest strategy.²⁷

However, except where invoked in certification systems such as FSC, the concept actually doesn’t have any fixed meaning. The BDS acknowledges there is “*no definition or criteria on restoration or on the sustainable use of ecosystems,*” and the JRC²⁸ muses, “*But what does sustainable mean?*” in a report commissioned to evaluate that very topic (they never did answer the question). The SFM concept at a minimum means ensuring the felling-to-increment ratio is less than one, but since this metric is flexibly assessed at all scales from a forest stand to forests of an entire country, everything up to and including clearcutting entire forests is considered “sustainable” as long as enough forests are left growing somewhere else. The very term thus seems Orwellian: war is peace, clearcutting benefits the climate. Because the word typically describes net carbon balance on a regional or even national scale, it implies nothing about logging practices or the quality of forests, their age, their carbon stocks, or their biodiversity. “Sustainable” logging certified by the Sustainable Biomass Partnership²⁹ is particularly implicated in clearcutting by the wood pellet industry both in EU countries like Estonia, and in the US and Canada, which import

²⁶ Article 191.

²⁷ <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12674-EU-Forest-Strategy->

²⁸ Camia et al 2021.

²⁹ Natural Resources Defense Council. 2017. The sustainable biomass program: smokescreen for forest destruction and corporate non-accountability. . In Natural Resources Defense Council. <https://www.nrdc.org/sites/default/files/sustainable-biomass-program-partnership-project-ip.pdf>.

wood pellets to the EU. Overall, the concept of sustainable forest management has proved to be a disastrous sham, providing cover for some of the worst excesses of the forest and biomass industry.

Recommendation: Stop using the term “sustainability” without clearly defined metrics

Unless and until there is an accepted definition of sustainable forest management with clear quantifiable metrics, the term should be retired. At a minimum, the term should not be used in any EU document unless the authors define exactly what it means and provide quantifiable metrics by which it can be assessed. For those times when a vague phrase is needed, the phrase “reduced impact management,” or something similar can be used.

Recommendation: Stop equating sustainability with carbon neutrality

Since numerous studies, including by European Commission staff,³⁰ the JRC,³¹ and the European Academies Science Advisory Council³² have now thoroughly debunked the idea that “sustainably” harvested biomass produces a reduction in GHG emissions compared to fossil fuels, much less “carbon neutral” biomass, the term “sustainable biomass” should be retired. The RED should be revised to eliminate the use of forest wood for renewable energy, and its false and unjustified promise – that sustainability and greenhouse gas emissions savings criteria can “*continue to ensure high greenhouse gas emissions savings compared to fossil fuel alternatives, to avoid unintended sustainability impacts, and to promote the internal market*”³³ – should be deleted.

Climate mitigation and biodiversity values are intertwined

Overall, the higher a forest’s ecosystem integrity, the greater its stability, resilience, and resistance to threats, and the greater its climate mitigation benefit and adaptive capacity. The BDS recognizes that “*Biodiversity fares better in protected areas,*” and calls for strict protection of all remaining EU primary and old-growth forests, as well as increasing the “*quantity, quality and resilience of its forests, notably against fires, droughts, pests, diseases and other threats likely to increase with climate change.*” This all sounds very promising, as long as increasing the “quality and resilience” of forests does not provide cover for intensified management of natural forests.

³⁰ EC staff: “*Certain forest management practices can enhance the carbon sink, but ensuring that the harvest level stays below the growth rate of the forest is not sufficient to ensure climate change mitigation.*” European Commission. 2016. Impact Assessment: Sustainability of Bioenergy. Accompanying the document Proposal for a Directive of the European Parliament and of the Council on the promotion of the use of energy from renewable sources (recast). Brussels. At https://eur-lex.europa.eu/resource.html?uri=cellar:1bdc63bd-b7e9-11e6-9e3c-01aa75ed71a1.0001.02/DOC_1&format=PDF

³¹ JRC: “it is incorrect to say that bioenergy is assumed “carbon neutral” within the broader EU climate and energy framework.” Camia et al 2021.

³² Norton, Michael, et al. 2019. Serious mismatches continue between science and policy in forest bioenergy. GCB Bioenergy 0 (0). At: <https://onlinelibrary.wiley.com/doi/abs/10.1111/gcbb.12643>.

³³ Recital 102 of the RED II, at <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018L2001&from=fr>

Recommendation: Re-naturalize forests and decrease harvesting pressure overall

Accordingly, the EU should adopt policies that favour re-naturalization of plantation forests so that forests mature to store more carbon and develop more complex ecosystems. All other things being equal this means lighter-touch forestry, *longer* rotation lengths and *less* wood extraction – goals that are fundamentally incompatible with expectations that wood is going to play a significantly expanded role in a new “bio-economy.” Policymakers must confront this dilemma head-on.

Recommendation: Integrate the Forest Strategy under the Biodiversity Strategy

The last forest strategy did nothing to achieve the transformative change the forest sector needs. The new strategy must include ways to ensure forest management supports biodiversity objectives. The inception impact assessment for the new Forest Strategy, and the European Parliament’s own-initiative report, already indicate heavy forest industry influence and an intended trend toward increased harvesting. To ensure the new Forest Strategy is compatible with the Biodiversity Strategy, it should be prepared by the European Commission’s DG Environment, not DG Agriculture, which so far has mostly ignored forests’ broader ecosystem services beyond very narrow considerations. The Forest Strategy should implement and strengthen the Biodiversity Strategy’s goals, not weaken them.

Recommendation: Listen to the scientists

Again and again we hear the same thing from the forest industry: that owners want to protect forests... that more harvesting and management is the answer... that forestry is being done “sustainably.” These claims may seem true to the individuals who make them, but in aggregate are obviously false, as the overall poor condition of the EU’s forests demonstrates. To save forests and the climate, policy makers must put forest ecologists, biologists, and climate scientists in charge of policy – and stop following the direction of the very industries responsible for the current disaster.