



Review of final EU Forest Strategy, July 16, 2021

Introduction

Now that the [final version of the Forest Strategy](#) has been published, it's time to [compare it](#) with the leaked draft from back in June. [That document](#) was a relatively trim 17 pages, and contained a generous amount of ambition for restoring forest ecosystems and the EU's forest carbon sink. It's not surprising the final version is longer (25 pages), but what makes up the difference is not always substantive - in fact a lot of the strategy seems to consist of pandering to the forest industry.

We know what happened – the forest industry had a mass freak-out concerning proposals for reform that were floated in the early draft. Staff at DG Energy got in on the act, submitting highly critical comments on the draft that were based on letters from the forest industry and in fact contained some of the identical language. Once this mini-scandal was [uncovered](#), the question remained: how much had industry managed to weaken the final draft?

It turns out that much of the aspirational language of the initial leaked draft has been retained, which is good to see, but in key cases the language has been watered down, and the entire thrust of reform has been somewhat blunted by forest-industry-inspired equivocation.

Still wrong on the bioeconomy, but a little more honest

The crux issue, and our [main complaint](#) about the leaked draft in June, was the document's excessive credulity regarding the "bioeconomy" as climate mitigation, which we said failed "to recognize the fundamental incompatibility of achieving an 'extraordinary and urgent increase in the net annual forest increment' while increasing forest exploitation." (The phrase about the need for an "extraordinary and urgent" increase in the net annual forest increment has been deleted from the current draft).

We [criticized](#) the draft because it did not acknowledge [science from the Joint Research Centre](#) that concludes that additional logging for the bioeconomy sucks carbon out of the forest and increases emissions for decades. Surprisingly, however, the final Forest Strategy *does* cite the JRC study and acknowledges that increasing harvesting for long-lived wood products does not deliver climate mitigation in a timely way:

Page 5: The supply of wood products should be done in synergy with improving the conservation status of European and global forests, and preserving and restoring biodiversity for forest resilience, climate

*adaptation and forest multifunctionality. Wood of high ecological value should not be used, and the wood-based bioeconomy should remain within the boundaries of sustainability and **be compatible with the EU's 2030 and 2050 climate targets and biodiversity objectives**. As indicated in recent studies, **in the short to medium term, i.e. until 2050, the potential additional benefits from harvested wood products and material substitution are unlikely to compensate for the reduction of the net forest sink associated with the increased harvesting**. Member States should pay attention to this risk, which is in their responsibility under relevant applicable legislation.*

So here is the Forest Strategy admitting that “the most important role” for wood products, i.e. “to help turn the construction sector from a source of greenhouse gas emissions into a carbon sink” – *is a fallacy*. It won't deliver climate mitigation by 2050, the target year for “climate neutrality,” because the very act of harvesting forests and converting wood into products loses so much carbon that you are actually better off simply letting the forests grow if the objective is climate mitigation (to say nothing of ecosystem restoration).

Looking at the numbers brings home the message. Harvested wood products (HWP) account for about -40 million tonnes of carbon storage per year, representing not new, additional sequestration (as they seem to claim) but a lateral move of carbon sequestered by forests. Forest land, on the other hand, [sequestered](#) over -345 million tonnes of CO₂ in 2019. JRC staff co-authored a [modelling paper](#) cited in their [recent briefing](#) that found while a 20% increase in harvesting by 2030 compared to 2000 – 2012 levels would increase annual carbon stored in HWP by 8%, it would *decrease* the much larger forest carbon sink by 37%. As a rough estimate, applying these percentages to the two carbon pools, increasing the HWP pool by 8% would increase it to -43 million tonnes, while decreasing the forest carbon sink by 37% would reduce sequestration (making it less negative) to -217 million tonnes, a reduction of 128 million tonnes of carbon uptake per year. The EU's mandated ambition is to build the land sink to -310 million tonnes (as of 2019 it's -243 million tonnes, due to emissions from agriculture and other land uses that offset uptake by the forest sector). Most of the additional carbon uptake will have to come from the forest sector. How does it make sense to further erode carbon uptake in forests by pouring more water into the leaky bucket that is harvested wood products?

It's also worth noting the relative magnitude of HWP and woody biomass burned for fuel. The document points out in footnote that “wood based construction products” represent 15.7 million tonnes of material (presumably each year). Assuming a conservative moisture content, this material would represent about 25 million tonnes of CO₂. Comparing that with the amount of CO₂ annually emitted from wood biomass burning, which the JRC reported was 350 – 380 million tonnes of CO₂ in 2015 (the figure is certainly higher now), the amount of CO₂ emitted by burning wood (of all types – primary and secondary woody biomass) is more than *nine times* the amount stored in HWP (and incidentally, is also greater than the forest carbon sink). **If policymakers were serious about mitigating the climate and biodiversity crises, they would act quickly to reduce use of wood for renewable energy**. Removing incentives for its use of fuel would have an immediate effect, as about one-half of harvested wood is burned for fuel.

Altogether, the Forest Strategy's embrace of the bioeconomy is based on false assumptions and forest industry talking points about how "sustainable" and "climate-friendly" their practices are – even as forest ecosystems collapse and more and more forest carbon is liquidated into the atmosphere. As scientists and activists who want to believe that policymakers act in good faith on climate, it's really an uncomfortable experience to see them handing the reins over to the very industry that is responsible for EU forests being in such awful shape that even [VP Timmermans](#) referred to "ecocide." It's also scary to see policymakers attempting to bend physics to their will. Harvesting and burning wood is going to emit net carbon no matter how "sustainably" harvested it is. At this point, the only hope for a rational outcome is if the promised study examining lifecycle emissions for HWP has integrity.

The forest industry gets its licks in

A key example of industry influence is that the earlier draft Forest Strategy was adamant that using forest wood to make short-lived products and burning it for bioenergy should be minimized:

[Earlier draft](#), page 2: *Given the increasing and sometimes competing demands on forests, **we must also ensure** that wood is optimally utilised in line with the cascading principle so that the **majority of it is used for long-lived materials and products that are of highest value** for a climate neutral and circular economy, while **minimising its use for short-lived products and energy production.***

And page 10: *The focus therefore has to be on a **drastic shift from short-lived to long-lived uses of wood**, such as buildings and furniture, including through better reusing and recycling wood products from construction and demolition sites.*

But the new/final draft reflects the forest industry influence, including text about the importance of short-lived products (none of it backed up by science, and in fact contradicted by published science from the EU's own Joint Research Centre – but that's true of a lot of the document):

Page 5: *Short-lived wood-based products also have a role to play, especially in substituting their fossil-based counterparts. Wood used for the production of short-lived products and also for energy production should rely on wood that is unsuitable for long-lived materials and products, and secondary woody biomass such as sawmill by-products, residues and recycled materials. Technological advances already facilitate processing of woody biomass residues and waste for circular innovative materials and products thus diversifying the bio-based products and offering climate-friendly solutions for new or emerging application areas.*

Skeptical on biomass

Despite excessive credulity on the bioeconomy, a hopeful and optimistic eye can find some tempered language on bioenergy in the Forest Strategy. With [publication of the RED](#) and the proposed changes to what qualifies as eligible biomass, a whole new section was added to the

Forest Strategy that did not yet occur in the leaked draft. However, its endorsement of bioenergy is not exactly full-throated:

Page 7: *Bioenergy will continue to have a notable role to play in this mix if biomass is produced sustainably and used efficiently, **in line with the cascading principle** and taking into account the Union’s carbon sink and biodiversity objectives as well as the overall availability of wood within sustainability boundaries in 2030 perspective.*

***Where no effective wood material utilisation is possible**, bioenergy will also continue to have a role to play in improving the livelihoods of primary producers, namely foresters and farmers, and diversifying forest-based economic opportunities in rural areas. The additional revenue from bioenergy markets can ensure revenues to forest owners and managers in all stages of sustainable forest management, and with that help secure a regular income from their land.*

It’s also interesting to see that the Forest Strategy appears to conclude that the new RED biomass sustainability rules still are a few cards short of a full hand:

Page 7: *To ensure both the socio-economic benefits and the environmental sustainability of wood-based bioenergy, the 2018 Renewable Energy Directive **included enhanced sustainability criteria** for all types of biomass for energy.*

*In addition and in light of the recent scientific evidence and the increased climate and biodiversity ambition of the EU, **there is the need to further strengthen the sustainability safeguards of forest-based bioenergy**. A recent Commission Report on the use of woody biomass for energy production in the EU shows an increasing overall use of woody biomass in the EU in the past two decades (around 20% increase since 2000), which may be additionally impacted by the increased renewable energy target. The study furthermore compares the impacts of the different management practices on both biodiversity and climate change and identifies “win-win” management practices that contribute positively to both.*

Page 8: *To mitigate the potential climate and environmental risks related to the use of wood-based bioenergy and to **maximise its positive climate impact**, the EU Biodiversity Strategy for 2030 said that the **use of whole trees for energy production, whether from the EU or imported, should be minimised**.*

It sounds like they think additional protections are needed, and that the RED sustainability criteria do not address the fact that burning forest biomass is a net source of greenhouse gases. The authors were still too timid, however, as they never mention the [conclusions by the EC’s own scientists](#) that burning wood, even wood sourced “sustainably,” increases emissions compared to fossil fuels. On this front, as with other cheerleading on the bioeconomy, the Forest Strategy fails to deliver credible science. But commendably, the proposal calls for building a broader science partnership for the monitoring and management of forests, which is badly needed for forests in the EU and beyond.