



To:

Mr. Clyde Kull, Ambassador, Deputy Permanent Representative of the Permanent Representation of Estonia to the EU

Mr. Norbert Lins, Member of the European Parliament

Mr. Artur Runge-Metzger, Director, DG Climate Action, European Commission

Brussels, 18 October 2017

Re: Appeal from the forestry and agricultural sectors to recognise the role of forestry in the EU post-2020 policy on climate change mitigation

Dear Ambassador Kull, dear Mr. Lins, dear Mr. Runge-Metzger,

We are writing you jointly as organisations of the forestry and agriculture sectors in view of the upcoming trilogue negotiations on the proposal for a Land Use, Land Use Change and Forestry (LULUCF) Regulation. We are deeply concerned that the future regulation of the EU risks to not recognise the role of forests in climate change mitigation and to discourage active and sustainable forest management, which is crucial in order to facilitate meeting the EU's carbon emission reduction targets and the long-term targets laid out in the Paris Agreement.

We are convinced that one of the avenues towards meeting the EU's climate and energy targets and commitments is the development of a low-carbon circular bioeconomy, which will allow Europe to combine the need to ensure environmental integrity with societal needs and economic development.

Sustainable forest management is the best long-term strategy for European forests to fulfil their climate change mitigation role while ensuring the adaptation of forest ecosystems to changing climatic conditions. This year's catastrophic forest fires and storms are vivid reminders of the necessity to actively manage forests and make them resilient in a changing climate.

We would, therefore, like to share with you our deep concern about the future of the forestry and agricultural sectors if the European Commission's proposal to establish forest reference levels based on the historic intensity and use of forest resources is kept (Art. 8.3.2). This would not incentivise sustainable forest management, encourage the use of sustainable and long lasting forest products or the transformation to a bio-based economy.

Furthermore, the outcome of the Environment Council of 13th October introduces that a constant ratio between solid and energy use of forest biomass shall be assumed. This would artificially regulate the end-use of biomass and ignore the principles of the market economy and other factors, such as timber quality and availability and the economic situation.

By narrowing the reference level to a period when harvesting levels were lower, we would be turning our backs on decades of investments made in order to sustainably manage and develop Europe's forests. These investments have resulted in a significant growth of resources, both in terms of area and volume. Data demonstrates that forests grow more when they are put in economic use, having due consideration of the economic, social and environmental dimensions of sustainable forest management. It is of outmost importance to avoid outsourcing the production of wood to third countries, and to safeguard jobs and green growth in Europe.

If these facts are ignored, the proposal will inevitably negatively affect forest owners, managers and downstream industries, and will impede future investments in the sector. Consequently, it will negatively impact the development of and employment in the EU's rural areas. This is why we urge you to change the simplistic logic of the proposed reference level and move it to a pro-growth trajectory.

While the urgency to reduce carbon emissions makes it important to increase our forests' carbon sinks, leaving forests untended does not equate with a continuous increase in carbon stocks and is not a sustainable long-term solution. As the oil era comes to an end, a sustainable forest-based bioeconomy can provide climate action and support healthy, viable and multifunctional forest ecosystems in the long run.

Therefore, while finalising the LULUCF Regulation, there is a unique chance to make a difference for people, forests and climate. Therefore, **we encourage the EU institutions to develop the EU post-2020 climate policy framework in a way which fully reflects the positive role of sustainably managed forests for the economy, the climate and the society. This can only be done by changing the rules of establishing the forest reference levels towards a more flexible and forward-looking approach, such as the one adopted by the European Parliament on 13 September.**

Thank you in advance for your support in this crucial matter.

Sincerely,



Hubert de Schorlemer - President of the Confederation of European Forest Owners - CEPF



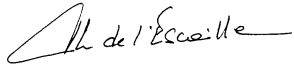
Joachim Rukwied - President of European Farmers - COPA



Thomas Magnusson - President of European Agri-Cooperatives - COGECA



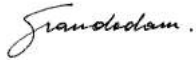
Per-Olof Wedin - President of the European State Forest Association - EUSTAFOR



Thierry de l'Escaille - Secretary General of the European Landowners' Organisation - ELO



Simo Jaakkola - Vice-President of the European Organisation of Agricultural, Rural and Forestry Contractors - CEETTAR



Pierre Grandadam - President of the European Federation of Forest Municipalities - FECOF



Michael Diemer - President of the Union of European Foresters - UEF



Leire Salaberria - Managing Director of the Union of Foresters of Southern Europe - USSE