

## **EUSTAFOR Position Paper <sup>(1)</sup> on the EU Biodiversity Strategy to 2030**

### **EU Biodiversity Targets 2030 must be balanced, realistic and feasible**

#### **Introduction**

Managing forests sustainably means to manage and use them in such a way that their biodiversity, productivity, regeneration capacity, and vitality are maintained while leaving all interconnected ecosystems intact, so that future generations will benefit from forests as much as, and possibly even more than, we do now.

Forests provide a home for thousands of bird, mammal, insect, and plant species that are of the utmost importance for the vitality and resilience of forest ecosystems. About 50% of the Natura 2000 sites (37,5 million hectares) <sup>(2)</sup> are forests, of which 8 million hectares <sup>(3)</sup> are state forests managed by EUSTAFOR members. An additional 16 million hectares <sup>(3)</sup> of state forests provide benefits resulting from their protected or protective status. Management practices applied in state forestry clearly show that the ecological functions of forest ecosystems and biodiversity can be maintained in managed forests along with all other functions. Sustainable forest management is not only compatible with the conservation of biodiversity but, in most cases, actively contributes to its maintenance and enhancement <sup>(4)</sup>.

The EU Biodiversity Strategy aims to halt the loss of biodiversity and ecosystem services in the EU and to help stop global biodiversity loss, reflecting the commitments taken by the EU within the international Convention on Biological Diversity <sup>(5)</sup>. A well-designed EU biodiversity strategy could play a major role in upscaling good European experiences to a global level. However, the EU conservation targets should be reliable and achievable and, thus, not overburden forest managers. In that context, EUSTAFOR agrees with the European Commission on the approach embedded within the framework of the EU Green Deal, to have well-coordinated EU policies to address key challenges such as climate change and biodiversity on the one hand, and the bio-based circular economy and social well-being on the other.

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<sup>1</sup> Any statement in this document is to be considered as a reflection of the best available professional expertise and does not necessarily reflect the political commitments of individual member organizations.

<sup>2</sup> European Commission. (2015). [Natura 2000 and Forests. Part I-II, p. 39](#)

<sup>3</sup> Internal EUSTAFOR's database.

<sup>4</sup> [https://eustafor.eu/uploads/EUSTAFOR\\_Natura\\_2000\\_Booklet\\_20191218-compressed\\_compressed.pdf](https://eustafor.eu/uploads/EUSTAFOR_Natura_2000_Booklet_20191218-compressed_compressed.pdf)

<sup>5</sup> [https://ec.europa.eu/environment/nature/biodiversity/strategy/index\\_en.htm](https://ec.europa.eu/environment/nature/biodiversity/strategy/index_en.htm)

This position paper analyzes the potential consequences of the announced Biodiversity Strategy to 2030 on forest management, in particular in European state forests. In addition, EUSTAFOR's recommendations are put forward on how the potential targets should be defined in light of the multiple objectives and demands on European state forests.

### **Five policy recommendations to make the EU biodiversity targets for 2030 balanced, realistic and feasible**

EUSTAFOR generally welcomes the efforts by the European Commission to develop a Biodiversity Strategy to 2030 as one of the paths towards the EU Green Deal and the Global Biodiversity Framework proposed by the Convention on Biological Diversity (CBD). To fulfill its purpose, the Strategy needs to build upon sound scientific knowledge and verifiable facts. Its objectives and targets should be ambitious but realistic and feasible. The five messages below provide the recommendations of European state forests on how to make the EU Biodiversity Strategy future-fit:

#### **1. Conservation targets should be supported by a solid assessment of the current biodiversity status and trends in the EU**

Even though EUSTAFOR strongly believes that the effective way of safeguarding biodiversity is through cooperation and joint efforts at global level, the EU Biodiversity Strategy and its targets need to be achievable and not just aspirational. Therefore, they should build upon a thorough assessment of the current biodiversity status and trends based on a unified methodology within the EU. Various available sources of data need to be used, especially as forest resources are subject to global, pan-European, EU-based and national assessments. It is particularly important that data reported by the Member States are verified and thoroughly cross-checked with relevant actors at national level, including national ministries, forest owners and managers. Consequently, EUSTAFOR calls on the Commission to develop conservation targets for forest ecosystems based on relevant data, by comparing information derived from different reporting sources – the EEA report <sup>(6)</sup>, the State of Europe's Forests report published by Forest Europe <sup>(7)</sup>, the FAO Forest Resource Assessment <sup>(8)</sup> and Eurostat <sup>(9)</sup>, all to be based on forest inventories and forest monitoring in Member States.

#### **2. Restoration commitment requires properly defined objectives**

The Biodiversity Strategy should contain clearly defined objectives. From a forest manager's perspective, the restoration objectives, especially those in old-growth forests and primary forests, must be precise and based on sound scientific knowledge. Furthermore, specific causes of forest ecosystem degradation must be identified, examined and well understood, whether in the context of global or EU circumstances, which differ significantly. For instance, the

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<sup>6</sup> [The European environment – state and outlook 2020](#)

<sup>7</sup> [FOREST EUROPE State of Europe's Forests](#)

<sup>8</sup> [FAO Global Forest Resources Assessment \(FRA\)](#)

<sup>9</sup> [Agriculture, forestry and fishery statistics — 2019 edition](#)

degradation of forests due to industrial emissions, urbanization or farming should not be mixed with the ongoing decomposition of forest stands caused by climate change-induced prolonged droughts, storms and forest fires, followed by the massive occurrence of biotic damaging agents, such as pest and diseases. Just as there are different causes of forest degradation, so there are different management approaches needed to cope with them. Recovery from biotic and abiotic calamities is embedded within Sustainable Forest Management (SFM) practices and regulated by forest legislation, and, therefore, a separate recovery plan with binding targets would be counterproductive.

While the assessment of the current Biodiversity Strategy implementation in the EU is still not available and the last Fitness Check on the Birds and Habitats Directives concluded that EU law is "fit for purpose," we question the justification of establishing a new EU legal framework to support the implementation of the restoration objectives, including through legally binding EU restoration targets.

Instead, we support working in partnership with Member States and European networks of environmental agencies, to improve compliance and governance, at a local level, within the existing legislative framework.

### **3. Clarifying the concepts of "primary" forests and "old-growth" forests**

Primary and old-growth forests, their definitions, mapping, monitoring and protection are often discussed in the context of the EU's biodiversity. Primary forests are rare in Europe and, in general, well-identified. They are already subject either to a protection regime or special management treatment and the potential for further designation is very limited in the EU. EUSTAFOR agrees that European primary forests should be treated with a special management regime which foresees their preservation as the main management objective.

EUSTAFOR underlines that while FAO provides a definition of "primary forests" <sup>(10)</sup>, there is no established clear definition of "old-growth" forests in any international forest reporting system, either globally, or in the EU. It is premature to propose to include this concept into the Biodiversity Strategy and link it to its objectives unless the definition is clarified. The Commission and Member States should first agree on a definition based on scientific facts and, only then, seek appropriate strategies to map and manage these areas.

For the reasons set out above, including these forests in the restoration objective along with other ecosystems could weaken the objective and create ambiguity for its implementation. To be clear, EUSTAFOR believes that considerations on the appropriate management approach to sustain primary forests and old-growth forests should be included in the upcoming EU Forest Strategy rather than the Biodiversity Strategy.

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<sup>10</sup> [Defined in FAO Global Forest Resources Assessment 2020](#) (p. 8).

#### **4. New targets need to be realistic, feasible and fairly distributed among various ecosystem types and land uses**

EUSTAFOR is very concerned about setting a target to increase the share of protected areas to at least 30% of terrestrial ecosystems and even more critical about the target to place 1/3 of those areas (i.e. 10% of all terrestrial ecosystems) under even further strict protection.

Even though the latest report, "The European environment – state and outlook 2020" <sup>(11)</sup>, concludes that terrestrial protected areas are largely on track towards meeting policy objectives and targets, there are claims which suggest that the current network of legally protected areas, including those under strict protection, is not sufficiently large to safeguard biodiversity and all ecosystem services.

It is not clear how these two targets should be accomplished among the various types of ecosystems, land uses and ownership structures. In EUSTAFOR's opinion, fulfilling these targets will create a significant risk of unequal distribution, as the key driver will not be the conservation status of species and habitats but rather the ownership of a given area and who can bear the economic burden of its implementation.

EUSTAFOR believes that, along with strict protection, sustainable management practices should also be acknowledged as an appropriate solution for the management of areas with a very high value or potential for biodiversity and, particularly, those most vulnerable to climate change. Forest ecosystems are becoming increasingly prone to various climate change-induced biotic and abiotic pressures, such as fires, droughts and storms as well as pest and disease outbreaks. Forests are rich ecosystems that remove carbon from the atmosphere by storing significant carbon stocks, including in forest soils. They regulate ground and surface water flows, protect micro-climates and infrastructure, as well as offer recreational and aesthetic values to society. The optimal way to keep them resilient and adapted to climate change is through SFM. Strict protection, without appropriate forest management, could be a risky strategy considering predictions about climate change and its negative effects on forests <sup>(12)</sup>.

#### **5. Strengthening SFM – a feasible way forward**

European state forests have been managed according to strict sustainability rules embedded in national forest legislation for decades. The evidence provided by EUSTAFOR members confirms that European state forests are multifunctional and sustainably managed. They provide a wide scope of ecosystem services, whether they are protected or not.

Natural ecosystem processes are followed by daily management practices in state forests and are fully acknowledged by the SFM concept which was recognized as a tool to implement the ecosystem approach, defined by the CBD, in forest areas at pan-European level <sup>(13)</sup>. As other proposed concepts, such

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<sup>11</sup> <https://www.eea.europa.eu/soer-2020>

<sup>12</sup> <https://eustafor.eu/uploads/Forest-dieback-in-Europe-and-measures-to-combat-it-.pdf>

<sup>13</sup> [https://www.foresteuropa.org/documentos/SFM\\_EA.pdf](https://www.foresteuropa.org/documentos/SFM_EA.pdf)

as “closer-to-nature forestry,” are relatively new and are not clearly defined, EUSTAFOR strongly believes that SFM should be used as the management approach to build upon commitments to which the EU and its Member States are already party. The latter include the Pan-European Guidelines for Afforestation and Reforestation with a special focus on the provisions of the UNFCCC (14), which should guide the announced EU guidelines on biodiversity-friendly afforestation and reforestation practices as part of sustainable forest management.

EUSTAFOR appreciates the Commission's efforts to further develop the Forest Information System for Europe. The system should, however, be fed by sound data from forest inventories and should be jointly led by the Commission and Member States within the framework of the new EU Forest Strategy post-2020.

### Conclusion

European multifunctional forests and forest-based products are at the core of the EU Green Deal agenda. The sustainable management of state forests fulfills multiple objectives and provides various products and services to the public. As forest ecosystems provide important habitats for fauna and flora, they are instrumental in the conservation of biodiversity. Although there are potential synergies between biodiversity conservation and other services provided by European state forests (i.e. climate change mitigation and adaptation), the existing trade-offs between various functions and services which forests can provide must be acknowledged. Future forest-related policies will consequently need to find a balance between different demands.

EUSTAFOR believes that the forest-related targets outlined in the EU Biodiversity Strategy to 2030 must be both meaningful and feasible. Thus, EUSTAFOR welcomes the prioritizing of afforestation as a means to increase EU forest cover and thus support the objectives of the EU Green Deal and green recovery plan.

While developing forestry-related objectives, active roles should be ensured by Member States, in line with the subsidiarity principle, as well as by forest owners and managers and all other relevant actors.

*EUSTAFOR has 36 members from 25 European countries, who manage around a third of the EU forest area, including 16 million hectares of protected and protective forests and 8 million hectares of forests designated as Natura 2000 areas. They have sustainable forest management and multifunctionality as major concerns. Their annual harvest amounts to about 130 million m<sup>3</sup> of round timber and together the member organizations employ more than 100 000 people.*

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<sup>14</sup> [https://www.foresteuropa.org/docs/other\\_meetings/2008/Geneva/Guidelines\\_Aff\\_Ref\\_ADOPTED.pdf](https://www.foresteuropa.org/docs/other_meetings/2008/Geneva/Guidelines_Aff_Ref_ADOPTED.pdf)