

EUSTAFOR Position Paper¹

on Land Use, Land Use Change and Forestry (LULUCF)

EUSTAFOR's 27 members (state forest organizations managing state forests), representing 30% of the EU forest area, are committed to sustainable forest management and working with existing certification schemes. The members' total harvest is approx. 115 million m³ per annum and together the members employ more than 100 000 people.

The European State Forest Association (EUSTAFOR) welcomes the positive recognition of forests and the forest sector in climate change mitigation in the European Commission Proposal on *accounting rules and action plans on greenhouse gas emissions and removals resulting from activities related to land use, land use change and forestry*" (COM (2012) 93 final). Forests have a crucial role in mitigating climate change through providing renewable raw material, sequestering carbon and substituting other more emission-intensive materials.

EUSTAFOR supports the Commission's proposal to increase the increment in European Forests when it is achieved through active forest management leading to higher uptake of carbon dioxide as well as to providing more renewable raw material for wood products and energy use.

However, EUSTAFOR considers that the Commission's proposal is not consistent enough to be able to achieve the most effective contribution from the forest sector to climate change mitigation.

EUSTAFOR strongly questions the Commission's proposal to go further than what was agreed in Durban in 2011. Creating stricter commitments at the EU level may weaken the competitiveness of European wood and thus result in less active forest management and less use of wood, thereby counteracting the carbon sequestration and climate change mitigation targets. Forests and their active, sustainable and multipurpose management are crucial for economic and social welfare in rural areas of Europe. Thus, adding more restrictions to the use of forests and wood production will have very negative impacts on the livelihoods of rural areas in many parts of Europe.

Accounting for emissions and removals from activities related to LULUCF in the EU needs to be in line with the decisions taken at a global level. It is questionable that the Commission has changed the definition of forest from the UNFCCC decision 16/CMP.1, where area of land considered as forest starts from 0.05 hectare instead of 0.5 hectares. This new definition also remains in contradiction with forest definitions applied in certain Member States and may cause inconsistencies in reporting to UNFCCC and the EU. Establishing and revising reference levels is in the Member States' competence and they should be reviewed and revised at UNCCC level only, not by the Commission. Therefore, EUSTAFOR calls on the European Union to stick to the agreements on the global level, including those concerning definitions.

The proposal from the European Commission is not consistent either when aiming both for increased carbon stock in the forest and for increased production and delivery of wood. Increasing the carbon storage in the forests must be achieved through in-

¹ 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 states.

creased growth, which in turn enables increased harvesting of the renewable raw material.

EUSTAFOR is seriously concerned about the statements in the explanatory memorandum regarding the means to boost mitigation, although this is expressed in the non-legislative part of the text. Proposals to adapt forest management to store carbon in forests through longer rotation periods of trees, avoiding clear-felling and converting forests to undisturbed forests go against the principles of carbon sequestration in forests as well as multifunctional forestry. Furthermore, silvicultural practices need to take into account the whole spectrum of parameters of forest ecosystems - such as species' demand for light, soil condition, precipitation and microclimate - and cannot be modified on an ad hoc basis depending on political demands. The conservation of carbon in existing forests is, in the long-term, only possible through active forest management. The significant factors for carbon sequestration are growth and production, not the carbon stock as such. Sustainable Forest Management (SFM) as defined in the Forest Europe process is a multifunctional concept that cannot be limited to climate change mitigation purposes only. The importance of maintaining decisions concerning forest management practices at the national and regional levels cannot be emphasized enough.

Climate change mitigation actions need to be incorporated into other policies and sectoral strategies. Creating a real, competitive European bio-economy which makes the best use of European forests and the raw materials and services they provide, would be the most efficient way for the forest sector to contribute to climate change mitigation. Including the harvested wood products (HWP) into the accounting emphasizes the importance of LULUCF as part of the transition to the real bio-economy.

It is of high importance that the LULUCF sector does not only face requirements but that incentives are provided as well, to develop systems which further improve the mitigation capacity of forests. EU climate change policy should support securing sustainable forest management and thereby enhance the productivity of forests and the mitigation of climate change. EUSTAFOR therefore calls for incentives under various EU policies, in order to enable the forest sector to increase its contribution to climate change mitigation.

EUSTAFOR is against specific mandatory national LULUCF Action Plans as proposed by the Commission. Forest policy is subject to subsidiarity in the EU and it is the Member States' right to determine how they can best include the LULUCF sector into their climate change mitigation plans. LULUCF actions should be included in national forest policies and programmes, which form the best basis for multifunctional and sustainable forest management and set out the objectives for the multiple uses of forests in Member States. The national forest programmes or their equivalent instruments are compiled in the widely participatory process which helps to gain public acceptance of these actions.

The EU's climate policy must be consistent and well-integrated into other policies on both the EU and the global levels. It has to aim to balance all forest functions and ensure the competitiveness of the European forest sector. European forests provide multiple benefits and the climate change mitigation and adaptation is one of these benefits. We consider that forests provide the best results for climate change mitigation when all three pillars of sustainability (social, economic, and ecological) are taken into account in a well-balanced manner.