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Feedback on the European Commission Roadmap: update of the EU Bioeconomy Strategy 2012

The Confederation of European Forest Owners (CEPF) welcomes the European Commission initiative to update the EU Bioeconomy Strategy 2012 and its Action Plan. CEPF highlights the importance of adapting the strategy to better correspond the current political priorities such as the UN Sustainable Development Goals, the Paris Agreement and EU policy developments such as the future Common Agricultural Policy, EU Forest Strategy and the Circular Economy.

More than 40% of EU's land area is covered with forests; a sustainable source of timber, pulp, paper and energy, providing the largest non-food renewable resource for a sustainable bioeconomy, growth in rural areas and around 4 million jobs in forestry and related industries. At the same time, Europe's forests sequester carbon from the atmosphere as they grow and deliver multiple goods and ecosystem services such as biodiversity, drinking water, non-wood forest products and recreational spaces. Forest owners have crucial role as managers of these natural resources so development of incentives and market-based tools for promoting these values should be developed. Consequently, forestry and the forest-based sector have a crucial role not only tackling challenges related to climate and environment but also challenges related to social and economic sustainability. Therefore, CEPF considers that the scope of the future initiative should address, via proposed systematic approach, not only future proofing food systems but also **forest-based sector** in Europe.

In addition, CEPF agrees that it is highly relevant that the initiative expands **beyond research and innovation**. However, rather than addressing trade-offs, the initiative should aim at finding **synergies between sectors**. This exercise should provide a reinforced framework that builds on the EU's common efforts to accelerate the transition from a fossil-based to a more bio-based economy with the inclusion of renewable raw materials for material and energy sectors. Moreover, as the EU-grown sustainable biomass is the first enabler of an EU bioeconomy and can further boost the vitality of the entire value-chain, the exercise should promote the further development of **rural areas** and offer new business opportunities along the value chain.

Promoting and supporting sustainable **biomass production and mobilisation** in the EU is key to further developing the bioeconomy, and consistent with worldwide sustainable development based upon renewable resources. Involvement of **forest owners** in the structures of the bioeconomy initiatives and decision making processes is of utmost importance to strengthen partnerships between different actors of society and enhance public awareness of the sustainable use of biomass resources. To better follow the effects of the bioeconomy strategy and enhance public awareness, socio-economic SMART indicators should be developed to highlight all the aspects of sustainability better.

CEPF agrees the importance of strengthening the circular bioeconomy and reminds that in the EU the implementation of **existing European and national policies and regulations ensure the sustainability of forest biomass sourcing**. This should be taken into account before taking any action on developing a new regulatory framework with additional, unnecessary burdens. Forest owners support the view that existing Sustainable Forest Management (SFM) practices are already well covered by Member State legislations and other additional tools. These practices ensure the sustainability of all forest biomass, irrespective of its end use.

The Roadmap describes eight priority areas in which **above mentioned issues should be taken into account as the Commission drafts the more detailed actions for the future bioeconomy**.