

Brussels, 3 August 2018

**Feedback on the European Commission proposal:  
CAP Strategic plans Regulation COM(2018) 392 final 2018/0216 (COD)**

The Confederation of European Forest Owners (CEPF) welcomes the European Commission proposal for a regulation on Common Agricultural Policy (CAP) Strategic Plans COM(2018) 392 final. CEPF highlights the essential role of forestry in achieving both EU and global objectives on climate, environment, bioeconomy, jobs and growth. The EU Forest Strategy stresses that CAP plays a crucial role in enhancing the contribution of forestry to reach these objectives.

More than 40% of EU's land area is covered with forests of which approximately 60% are privately owned. Forests sequester CO<sub>2</sub> from the atmosphere as they grow and deliver multiple goods and ecosystem services such as biodiversity, soil protection, drinking water, non-wood forest products and recreational spaces. At the same time, forests are 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. Investments in active and sustainable forest management will contribute to the achievement of CAP objectives. Therefore, CEPF welcomes the recognition of the role of forestry in EU specific CAP objectives, the continued presence of forestry measures under the Rural Development, and the reference to the EU Forest Strategy and the LULUCF regulation.

Moreover, CEPF underlines the importance of strengthening the interlinkage between bioeconomy and sustainable forest management in the context of CAP post-2020. The EU-grown sustainable biomass is the first enabler of an EU bioeconomy and can further boost the vitality of the entire value-chain. It promotes the further development of rural areas and offers new business opportunities. CEPF supports the greater emphasis on research, innovation, technology and digitalization and calls for a more prominent role of forestry in the European CAP Network.

Regarding the development indicators, CEPF highlights the importance of acknowledging changes in trends that are bound to the dynamic and long-term processes in nature. European forest owners have a crucial role as managers of forest resources, not only on tackling challenges related to social and economic sustainability but also on challenges related to environment and the impact of climate change on the resilience and vitality of forests. Therefore, CEPF highlights the link between active sustainable management and long-term climate goals to be achieved via resilient forests and increased CO<sub>2</sub> sequestration, carbon storage and substitution of fossil-based materials.

CEPF takes note that the proposal strengthens focus on environmental issues. Promoting and supporting the implementation of sustainable forest management in the EU is key to address biodiversity and is consistent with the UN SDGs. Thus, CEPF highlights that forest owners, as managers of forest resources, and their associations should remain eligible to receive financial support for their efforts to strengthen sustainable forestry and ecosystem services provided by forests. Measures within rural development programs should not only cover costs of those activities but also provide income for forest owners.



Regarding the application, administration and verification of progress toward the target processes, CEPF supports further increased simplification. Furthermore, a real simplification for beneficiaries should not only be addressed at EU level but also at national level. It is crucial that the control and sanction mechanisms respect the proportionality principle. Additionally, reality of small-scale forestry should be better acknowledged. Forest management plans should not be compulsory for small holdings below 20 hectares as the plans unnecessarily increase administrative burden for small-scale forest owners.

Consequently, we are convinced that CAP Strategic Plans regulation should continue to support and embrace sustainable forestry.