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## Feedback on the European Commission Roadmap: evaluation of the EU Biodiversity Strategy to 2020

The Confederation of European Forest Owners (CEPF) welcomes the European Commission initiative to evaluate the EU Biodiversity Strategy to 2020. In order to improve coherence and consistence of forest-related EU policies, CEPF highlights the importance of evaluating the strategy in light of the current political priorities such as the UN SDGs, the Paris Agreement and EU policy developments such as the future Common Agricultural Policy post-2020, the EU Forest Strategy, the recast of the Renewable Energy Directive and the LULUCF Regulation.

More than 40% of EU's land area is covered with forests of which approximately 60% are privately owned. European forests represent more than half of the designated Natura 2000 areas. 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. Forest resources, including growing stock and the size of forests have been significantly increasing during last decades in Europe. Investments in active and sustainable forest management are one of the prerequisites for the development of healthy and viable forest resources.

Moreover, the implementation and further development of sustainable forest management, integrating biodiversity, is at the core of forest owners' activities in Europe. Regarding the development of biodiversity, 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 resource, not only on tackling challenges related to social and economic sustainability but also on challenges related to the impact of climate change on the resilience and vitality of forests. Therefore, CEPF considers that the scope of the initiative should not only address progress made against EU 2010 biodiversity baseline but also on the link between sustainable management and long-term climate goals to be achieved via increased CO<sub>2</sub> sequestration, carbon storage and substitution of fossil-based materials.

Consequently, CEPF considers that it is highly relevant that the initiative expands **beyond biodiversity targets** and aims at finding **coherence between EU policies**. The exercise should provide a framework that builds on the EU's common efforts to protect and manage biodiversity. Promoting and supporting the implementation of **sustainable forest management** in the EU is key to further enhance biodiversity and is consistent with worldwide SDGs. **Involvement of forest owners** in the structures of the biodiversity protection initiatives and decision-making processes is of utmost importance to strengthen partnerships and enhance public awareness of the sustainable management of forests.

In addition, CEPF reminds that, in the EU, the implementation of **existing European and national policies, regulations and voluntary systems safeguards sustainable forest management**. This should be taken into account before taking any action to develop any new policy frameworks or initiatives resulting in additional, unnecessary administrative burden. Existing sustainable forest management practices are already well covered by Member State legislations and other additional tools.

CEPF welcomes the opportunity to contribute to further steps of the evaluation and reminds that it is of utmost importance that the European forest owners are considered as main partners, and not only as stakeholders, when it comes to the development of environmental policies that have an impact on their properties.

The evaluation Roadmap describes five areas in which **above mentioned issues should be taken into account as the Commission drafts more detailed actions for the evaluation of the Biodiversity Strategy to 2020 and the future biodiversity policy**.

