

CEPF reply to EC Roadmap on EU nature restoration targets

The Confederation of European Forest Owners (CEPF) would like to share key considerations to be taken while preparing the announced proposal on legally binding EU nature restoration targets and its impact assessment.

- All terms used should be well defined and commonly agreed upon before any further steps;
- EU existing legislation and recognition of relevant national existing legislations;
- Targets must be realistic, achievable and based on best available scientific knowledge;
- Acknowledge and address possible trade-off between climate and biodiversity objectives;
- Any target should be linked to a precise and accessible support mechanism, including financing mechanisms;
- Targeted ecosystems to be restored should be identified and determined at national or regional level;
- Areas to be restored should be designated only with the voluntary, prior and informed consent of their owners;
- Restoration efforts should address the real drivers of degradation, in the case of European forests climate changes impacts and spread of pest and diseases;
- Resilience, change of natural ranges and long-term nature of forests and forestry must not be overlooked;
- Primary forests can not be restored.

These key considerations are further elaborated in the annex document.

CEPF remains available for further comments or additional information and can provide case examples.



ANNEX to CEPF reply to EC Roadmap on EU nature restoration targets

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Terms used should be well defined before any further steps

First, CEPF would like to call the Commission for clarity on the terms used in the frame of this work. Indeed, a common understanding of the terms “nature restoration” or “nature degradation” are key, as well as the foreseen ecosystems status to be achieved with restoration measures. In practice, nature restoration can mean either the removal of impacts of human activities or on the opposite increased human activities such as nature management actions.

Similarly, this point on commonly agreed and well-defined term is also valid with regard to any specific target on “old-growth forest”.

CEPF would like to stress that certainty of the definitions of used terms must be guaranteed before any further step. Specifically, CEPF calls for the definition of these concepts and terms as starting points of the impact assessment and related analysis.

EU existing legislation and recognition of relevant national existing legislations

Second, CEPF reminds that, European forests are already significantly addressed by forest-related policies developed at EU level. In addition, existing national policies, regulations and voluntary systems cover well forest ecosystems and ensure the implementation of sustainable forest management. An additional EU legislation would not necessarily cover an actual gap of legislation.

CEPF would like to stress that the impact assessment will need to consider also the subsidiarity and proportionality of the proposed measures as mentioned in the Council Conclusion on the Biodiversity Strategy.

Moreover, the impact assessment should also evaluate, from ecological, economic and social viewpoints other policy options than a legally binding instrument. Voluntary measures supported by incentives must be considered as an equally relevant alternative.

This background has to be taken into account before taking any action to develop new policy frameworks or initiatives resulting in additional, administrative burden. CEPF hopes that the one-in-one out principle will be duly used in this context.

Targets must be realistic, achievable and based on best available scientific knowledge

Third, definitions of the restoration targets of and their level of ambition have to stay within realistic limits. External factors such as negative impacts of climate change on ecosystems cannot be ignored. Unattainable targets would hinder practical implementation.

Within the impact assessment, CEPF calls for the assessment of the cost-effectiveness of different options, uncertainties in the restoration process, time frame (e.g. the delay between a restoration action and the achievement of a measurable result). The findings should feed in the process to ensure measurable, timely, feasible and well-targeted actions, that must be based on best available scientific knowledge. When insufficient, this knowledge base has to be improved, based on scientific evidence.

Acknowledge and address possible trade-off between climate and biodiversity objectives

The foreseen nature restoration targets are stemming from the EU Biodiversity Strategy for 2030. It will be important to acknowledge and address possible trade-off between on one hand mitigation of climate change and its carbon storage objectives, as mentioned in the roadmap, and on the other hand biodiversity enhancement objectives. Restoration actions aiming at an improved conservation status of species and habitats or aiming at an increased carbon storages and carbon capture are not necessarily the same and can be competing objectives.

The impact assessment should consider and evaluate this possible trade off.

Any target should be linked to a precise and accessible financing and support mechanism

Fourth, support of stakeholders in charge of implementing policies is a key, including financial support, and achievement of goals should be bound to a realistic funding method. Reaching any restoration target will require actual availability of concrete and appropriate funding sources and opportunities.

These should be provided in an unbureaucratic way, to avoid an administrative burden that would reduce the uptake significantly. When relevant, market-based approaches such as payment for ecosystems services should be considered.

Any binding instrument should have a binding financing mechanism. It can not be expected that the economic burden of a new mandatory policy implementation would be borne by owners solely. Any additional management cost should be covered, and incentives should be duly considered.

The negative economic impact of restoration target should be addressed at all relevant levels, from individuals, forest owners, livelihoods, Member State, to EU level.

In addition to appropriate support and compensation measures, positive incentives, advisory services and voluntary bottom-up participatory processes supporting the expansion of existing best practices are crucially important.

Targeted ecosystems to be restored should be identified and determined at national or regional level

Fifth, CEPF highlight that the national level is the appropriate level to define any detailed planning and precise implementation of restoration targets. This will allow them to be relevant to the specificities of each Member State and their relative ecosystem restoration's needs, based on a bottom-up approach.

Flexibility at Member States level and, when relevant, regional level is a prerequisite for concrete and successful outcomes that take into account cost-effectiveness of actions as well as the fulfilment of the rights of forest owners, as well as previous achievements in national biodiversity conservation and restoration.

Areas to be restored should be designated only with the voluntary, prior and informed consent of their owners

Sixth, CEPF reminds that active involvement of forest owners in any biodiversity conservation initiatives and related decision-making processes is one of the most important enablers for biodiversity conservation. Such involvement should be ensured and enhanced on all levels and all steps of the process, including by acknowledging and respecting ownership rights.

Designation for restoration should only be made on a voluntary basis as forest owners must have the final say their forest management choices, including on potential restoration actions.

The impact assessment should address and analyse how the likely negative social impacts can be minimised or avoided. Supporting voluntary actions through different kinds of incentives is usually a much more acceptable way of promoting certain actions than using compulsory corrective approaches.

Restoration efforts should address the real drivers of degradation

Seventh, CEPF would like to underline that in the recently published [first EU-wide assessment of ecosystems](#) main negatives trends for pressure on forest ecosystems are related to the more frequent and more extreme occurrences of natural disasters and the spread of invasive alien species.

These driving pressures should be the one primarily addressed by any restoration actions targeted at forest ecosystems. Measures supporting climate change mitigation and adaptation are simultaneously needed to achieve the biodiversity restoration goals. In this sense, forest ecosystems should not be limited to their potential to capture and store carbon. European forest can provide at the same time for carbon storage in forests and forest-based products and substitution of non-renewable materials and energy.

Resilience, change of natural ranges and long-term nature of forestry must not be overlooked

Eighth, CEPF highlights the importance of taking into account that forest ecosystems are bound to dynamic and long-term processes in nature, and that the European Union hosts a broad variety of forest ecosystem types, each with their respective challenges including a growing intensity of climate-change induced threats.

Resilience of forest ecosystems is a highly relevant concern in changing climatic conditions, which should be addressed in a dynamic and flexible way. Climate change significantly modifies ecosystems and forest management decisions of today needs to be able to take into account the conditions of the future. Increased resilience of EU forests through their adaptation to climate change must be suitable to local conditions and consider all available tools (e.g. biological diversity and genetic resilience, risk management and prevention, restoration of forests degraded by natural disasters, or forest management plans).

Narrowing the focus of actions for restoration of damaged ecosystems to solely “native species” would imply ignoring that climate change is changing natural forest ecosystems range and distribution. The long-term nature of forestry implies that selection of tree species should be forward-looking: they must remain adapted to site and climatic conditions foreseen by climate modelling. In addition, it would hinder possibilities to address forest adaptation and forest mitigation. Options for increased forest resilience delivering for biodiversity include the use of species adapted to the local condition of the sites on the long-term, which are comprising both currently native and non-native tree species.

To meet a holistic approach of multifunctional forestry, species should also continue to produce the products and services for which they are valued.

Primary forests can not be restored

Lastly, CEPF would like to note that the restoration of primary forest is a non-sense as any human intervention would make them de facto secondary forests. By definition¹, primary forests are forest areas that have never been under any human influence. Thus, any restoration actions would *per se* make them loose this primary character.

¹ According to the FAO Terms and Definitions of the Forest Resources Assessment, a primary forest is defined as a “Naturally regenerated forest of native tree species, where there are no clearly visible indications of human activities and the ecological processes are not significantly disturbed.” <http://www.fao.org/3/l8661EN/i8661en.pdf>