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Public consultation on a new EU forest strategy

Fields marked with * are mandatory.

Introduction

The Commission's December 2019 <u>Communication on the European Green Deal</u> set out an ambitious vision of the EU becoming a sustainable, climate-neutral economy by 2050. It also announced that, building on the EU's 2030 biodiversity strategy, the Commission would prepare a new EU forest strategy covering the whole forest cycle and promoting the many services that forests provide. The key objectives of the strategy would be effective afforestation and forest preservation and restoration in the EU, to help increase the absorption of CO2, reduce the incidence and extent of forest fires and other risks, and promote the bioeconomy in ways that fully uphold ecological principles and are conducive to biodiversity.

The EU forest strategy will enable the forest sector to contribute to the new Commission priority of building a new growth model through the European Green Deal, including support for rural areas. Many EU policies are relevant to forests, so there is a need for a comprehensive strategy to ensure a consistent approach.

The strategy will also help the EU to meet its international commitments and will form the basis of a clearly established, consistent and holistic approach on forests, allowing stronger EU leadership internationally (in the context of the UN 2030 sustainability agenda, the Paris Agreement, the Convention on Biological Diversity and the Convention to Combat Desertification). The 2019 Communication on Stepping up EU action to protect and restore the world's forests established a framework for the EU's global action; this must be properly and consistently reflected in the formulation of domestic policies.

Through this public consultation, we invite citizens and organisations to contribute to the preparation of the new EU forest strategy and share their views on potential objectives and actions.

The consultation seeks stakeholders' input on challenges and opportunities as regards our forests, in particular in relation to the climate, biodiversity, rural areas and socio-economic welfare, disaster risk management, EU support instruments, forest-based industry, the EU's global leadership and its target of planting 3 billion trees by 2030.

The consultation will focus on EU territory, thereby complementing the results of the Eurobarometer survey on the current role and benefits of the EU's forests and the activities set out in the Communication on Stepping up EU action to protect and restore the world's forests.

Other public consultations are taking place in parallel on 'land use, land-use change and forestry — review of EU rules' and the new EU soil strategy.

The task of the Royal Swedish Academy of Agriculture and Forestry is to promote agriculture and forestry and associated activities with the support of science and practical experience and in the interest of society.

*Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the <u>personal data protection provisions</u>

PART 1

Your views on potential objectives and actions of the new EU forest strategy

In its roadmap on the new EU forest strategy, the Commission set out a number of specific potential objectives and actions which the strategy could address. This section aims to obtain quantitative feedback on these objectives and actions, in order to determine public preferences and additional suggestions.

Please rate the relative importance of the following objectives and actions for the new EU forest strategy:

To nurture the forests that we have the new EU forest strategy should ...

	very important	important	slightly important	not important	l don't know
*enhance forest protection and restoration to meet the EU biodiversity and climate objectives, and reduce the loss of forest coverage, while strictly protecting all remaining EU primary and old-growth forests	0	0	•	0	•
*preserve stocks and increase the EU carbon sinks in forests, their soils and harvested wood products	0	0	0	0	•
*enhance prevention of disaster risk events and of damages, and secure forest resilience to incidence and extent of fires and other natural hazards, and secure forest health with a view to changing climatic conditions and environmental degradation	•	•	•	•	•
support restoration of damaged areas and degraded ecosystems, taking into account projected climate conditions	•	0	0	0	0
*ensure the sustainable management of all EU forests, maximising the provision of their multiple functions while enhancing their productive capacity	•	0	0	0	0
other (please specify in the comments box below)	0	0	0	0	0

The two first questions (...enhance forest protection and restoration to meet the EU biodiversity and climate objectives, and reduce the loss of forest coverage, while strictly protecting all remaining EU primary and old-growth forests; and ...preserve stocks and increase the EU carbon sinks in forests, their soils and harvested wood products) are unclear. For example, concerning the first question, EU biodiversity and climate objectives may not always benefit from the same solution, in this case forest protection. While forest protection may benefit biodiversity objectives, it may not in all cases benefit climate objectives. These objectives and different solutions therefore need to be balanced. This complexity is not reflected in the questionnaire.

In addition, the concepts of "primary forests" as well as "strictly protected" have not been clarified.

To plan for the forests of the future, the new EU forest strategy should foster...

	very important	important	slightly important	not important	l don't know
*afforestation and tree planting by setting out a roadmap for planting at least three billion additional trees in the EU by 2030, as announced in the Biodiversity Strategy for 2030, in full respect of ecological principles, contributing to climate neutrality, the circular economy and biodiversity	•	•	•	•	•
*adaptation of forests to climate change and strengthening their resilience to face future challenges, including through enhanced conservation and use of the genetic diversity of trees	•	•	•	©	•
*new training, skills and jobs that reflects the multiple functions of forests	•	0	0	0	0
rural development, including local enterprises and value chains, tapping on forests' multiple functions	•	0	0	0	0
innovative forest-based services and products with low environmental impact, replacing carbon-intensive counterparts	•	0	0	0	0
*a strong research and innovation agenda to improve our knowledge of forests and to optimise their composition, structure, management and use, including for the bioeconomy	•	•	0	0	0
other (please specify in the comments box below)	0	0	0	0	0

"afforestation and tree planting....":

Tree planting must also be envisaged with economic perspective of forestry and forest management. In addition, the geographical areas where afforestation should take place should be properly evaluated. The EU forest area has been increasing for decades. In Sweden replanting after harvesting has been obligatory by law since 1903. Each year some 380 million seedlings are planted, which equals approximately two per every tree felled in final harvests.

"adaptation of forests to climate change and strengthening their resilience to face future challenges, including through enhanced conservation and use of the genetic diversity of trees":

KSLA strongly supports adaptation of forests to climate change and strengthening their resilience to face future challenges but would seek clarification on what "enhanced conservation" means. Our answer is therefore only applicable to the first part of the reply.

To manage existing and new forests, it will be important for the new EU forest strategy to...

	very important	important	slightly important	not important	l don't know
*have a strong and inclusive governance framework engaging all relevant parties	0	•	0	0	0
foster a stronger coordination between national forest policies and the European Green Deal's objectives	0	•	0	0	0
*improve and harmonise the monitoring of forests to demonstrate the effective contribution of sustainably managed forests to the EU objectives, and of the supply and demand of forest services	©	0	•	0	0
*secure financing, including for research, enhancing the use of EU and national budget, as well as private funds, ensuring a consistent approach among different funding instruments (Common Agricultural Policy, Horizon Europe, Cohesion Policy Funds, LIFE, etc.)	•	•	•	•	•
*foster innovative financial incentives, including payments for ecosystem services and result-based schemes ('carbon farming') for forest managers that provide public goods such as carbon sequestration or biodiversity benefits, including through protecting and restoring forests	©	•	•	•	•

*improve communication and dialogues on forests and their roles, considering the rural/urban interface	•	0	0	0	0
*ensure consistency with international commitments, reinforcing EU's international leadership (2030 sustainability agenda, Paris Agreement, Convention on Biological Diversity, and Convention to Combat Desertification, Sendai Framework for Disaster Risk reduction 2015-2030)	•	•	•	•	•
other (please specify in the comments box below)	•	0	0	0	0

"Improve and harmonize the monitoring of forests to demonstrate the effective contribution of sustainably managed forests to the EU objectives, and of the supply and demand of forest services":

Before calling for general harmonization, it is necessary to identify those subjects where harmonization is needed as well as the purpose of such harmonization and the data needed; In addition, the question of the financing of data collection and monitoring and the respect of data privacy must also be addressed.

"Foster a stronger coordination between national forest policies and the European Green Deal's objectives": The EU Green Deal should build, acknowledge and rely on national forest policies which are already very much complete when it comes to forest management objectives and provisions. Sweden has since 1993 had two major objectives for its forest policy, one for production and one for environmental concerns.

"Ensure consistency with international commitments":

Consistency should not only be sought between EU and international policies but first and foremost among the different EU policies. The UN Sustainable Development Goals provide a suitable framework for the Strategy, as it considers all dimensions of sustainability in a broad and integral manner. Forests, their ecosystems and their products are connected to many of the 17 goals.

Other:

Rely on a solid scientific basis. The Strategy should use existing knowledge and contribute to develop the knowledge base.

PART 2

Optional questions on various forest aspects (you may choose not to answer all of them)

THREATS AND CHALLENGES FOR EU FORESTS

Q1 Please rate the following threats and challenges for forests in Europe

	very important	important	slightly important	not important	l don't know
current levels of natural disasters and extreme events (e.g. forest fires, droughts, storms)	0	•	0	0	0
projected risks for forests due to climate change (e.g. natural disasters and extreme events, and slow onset effects such as shifts in bioclimatic zones, precipitation, soil erosion)	•	•	•	•	•
pests and diseases affecting trees	0	•	0	0	0
vulnerability of monospecific plantations and stands	©	0	•	0	0
loss of biodiversity and of high conservation value forests, and ecosystem degradation	0	•	0	0	0
invasive alien species (invasive alien species' means a species introduced outside its natural range that might survive and subsequently reproduce, whose introduction or spread has been found to threaten or adversely impact biodiversity and related ecosystem services)	•	•	•	•	©
forest loss (i.e. deforestation) and forest fragmentation due to infrastructure development, urbanisation, etc.	0	0	0	•	0
lack of, or poor, management planning failing to take account of all services that forests provide	0	0	•	0	0
unsustainable forest management practices (e.g. large-scale clear cuts, harvesting damage, soil compaction, excessive use of pesticides/herbicides)	0	0	0	0	0
illegal logging	0	0	0	•	0
unbalanced local game populations, causing damage to forests	©	•	0	©	0

depopulation of rural areas and forest /land abandonment, leading to a lack of, or poor, forest management	•	0	•	0	0
lack of skilled workforce and relative unattractiveness of working in the forest (e.g. hard work, low income/revenues, limited investments opportunities)	0	•	0	0	•
competing demands on forest resources and ecosystem services (e.g. increasing demands for wood and wood-based products, biodiversity protection, recreation, carbon sequestration, disaster risk reduction)	•	•	•	0	•
other (please specify in the comments box below)	•	0	0	0	0

The biggest threat to the European forests is the pressure from climate change. Climate change threatens forest vitality, sustainable growth and harvesting as well as biodiversity and other ecosystem services that the European forests provide.

A low felling rate in comparison with forest growth creates large areas of older forest. Older forests are also taller and are therefore to a greater extent exposed to storm damage. They also become more vulnerable to various diseases and pests. Climate change risks both increasing these kinds of damages to the forests. At the same time, older forests create other conditions for biodiversity than younger forests.

A major challenge is thus to both develop and strengthen the competitiveness of the wood-based industries across the EU and to increase the mobilisation of wood in a sustainable way. EU forests are growing in area and volume, but annual felling is not increasing at the same rate. This is contradictory because the EU imports large volumes of both wood and wood products. Currently, more than 30 % of the net primary production (NPP) of wood used in the EU stems from imported biomass and biomass products (EEA, 2016). In 2018, about 397 000 enterprises were active in wood-based industries across the EU, representing 20% of EU manufacturing enterprises. (source Eurostat). The EU wood-manufacturing industry is an important part of the EU economy.

Increasing the use of woody biomass for bioenergy in a sustainable way is a much-debated issue in the EU. KSLA would like to refer to the Swedish example where bioenergy is mainly produced by by-products and side-streams from the forest industry. The production of bioenergy comprises approximately 100 TWh/year. This development has gone hand in hand with increased protection of forests for biodiversity and increased volume of dead wood in the forests.

Combining risk management due to climate change, biodiversity, bioenergy production, multifunctional use of forests and industrial development and competitiveness is a policy challenge. An important role for the EU's forthcoming forestry strategy is to seamlessly coordinate these different policy areas while considering the Member States' subsidiarity in forestry issues. The forest strategy should ensure a consistent strategy for the sustainable use of natural resources in Europe. Sustainable forest management should strive for a balance between all functions (economic, social, and ecological) forests as defined by the Member States.

At the same time, the EU's forests are affected by forest policy in third countries and third countries affect by EU policies. Restricting forestry in the EU could lead to lower mobilisation of European wood and increased pressure on forests in other parts of the world.

Regarding unsustainable forest management practices there is in Sweden an ongoing dialogue between different stakeholders aiming at improving management practices, e.g., by information and training. Concerning unsustainable forest management practices, the examples listed are a mix of management practices (e.g., clear-cut) and results of a management activity (e.g. harvesting damage). Considering the large variety of EU forest ecosystems and varying local contexts and legislations it is not feasible to categorize management practices as good or bad at the EU level.

FORESTS FOR SOCIAL AND ECONOMIC WELFARE IN RURAL AREAS

Many people depend on forests for their livelihoods, and many forest owners/managers, rural communities and farmers get part of their income from forests.

Q2 What should be done, in your opinion, to ensure that forests continue to provide rural communities with livelihoods and income?

	very important	important	slightly important	not important	l don't know
expand the economic and social opportunities that forests offer to rural communities	0	•	0	0	0
provide financial incentives for forest adaptation to climate change, and for strengthening forest resilience and carbon sequestration	©	0	0	0	0
provide financial incentives for forest biodiversity protection and forest restoration, e.g. payments for ecosystem services [e.g. water cleaning, floods and landslide protection, soil erosion control, cooling of cities]	©	•	•	©	•
support for post-disaster forest recovery	•	0	0	0	0
promote skilled jobs and better training for local populations	0	•	0	0	0
enhance advisory services and support for exchanges of good practice /knowledge and for lifelong learning	0	•	0	0	0
reward the communities that implement sustainable forest management and publicise successful stories (e.g. through logos, prizes)	0	•	0	0	0
support the local and sustainable sourcing of forest wood and non-wood raw materials (e.g. cork)	0	•	0	0	0
expand opportunities for income creation through non-wood forest products and services [e.g. mushrooms, berries, games, cultural services focusing on leisure, health, recreation, education, spiritual well-being]	©	•	•	©	•

support innovative and local forest cooperatives, SMEs and industries (fostering access to markets and value chains with wood and non-wood added-value products and services)	©	•	•	•	•
foster and promote cooperation and knowledge exchange among forest owners	0	•	•	•	0
support the digitalisation of forest management and use (including planning, implementation, monitoring and evaluation)	0	•	0	0	0
invest in infrastructure to support sustainable forest management, disaster prevention and management, and forest protection, and exploit the economic and social opportunities of forests for rural areas	©	•	•	•	•
encourage dialogue between different stakeholders on forest issues	•	0	0	0	0
other (please specify in the comments box below)	•	0	0	0	0

It is crucially important to recognize the great national and local variations when it comes to e.g., ownership, user rights (as reindeer husbandry) and local revenue from forests. The non-industrial private forest owners in Sweden, that hold roughly 50% of the forest land, include locals as well as people living at a distance, with varying relations to the area where their forest is located. While the income from forestry and forest related industry is significant in many rural municipalities, it is of less importance in areas where the forest land to a minor degree belongs to local private owners and where there is no forest industry within commuting distance. Consequently, any measures have to be designed in a way that they can appropriately adapt to the conditions at hand in order to be efficient.

Other:

Financial incentives could be motivated, but the statements above concerning providing financial incentives are too general to be appropriately responded to. Moreover, it is for the member states to decide on these incentives.

FORESTS FOR CLIMATE AND BIODIVERSITY

While the EU's forests are very important for biodiversity conservation and mitigating climate change through carbon sequestration, climate change is also putting them under increasing pressure. They must be managed sustainably, improved in terms of both quality and quantity, and proactively adapted to

projected climate change, in order to make an effective contribution to achieving the EU's climate and biodiversity objectives.

Q3 What specific actions and measures should the EU forest strategy promote to enhance forest biodiversity, adapt forests to climate change, and strengthen carbon sequestration?

	very important	important	slightly important	not important	I don't know
increase the EU forest area through afforestation and reforestation taking into account ecological and climate change related aspects	0	0	•	0	0
help individual forest owners and managers to identify and manage their climate change related risks, including financial risks	•	0	0	0	0
restore damaged and degraded forests	0	•	0	0	0
increase the area of forests protected for biodiversity conservation and restoration	0	0	•	0	0
manage protected forests more effectively, so that they achieve their nature conservation objectives	0	0	•	0	0
increase the proportion of diverse, uneven-aged and mixed-species forests	0	0	•	0	0
enhance the genetic diversity of forests and trees	0	0	0	0	•
give preference to native tree species and provenances and/or species that are better suited to future climatic conditions	0	•	0	0	0
protect forest soils and prevent soil degradation, in particular on carbon-rich soils [e.g. limit machinery use in harvesting operations, establish different skidding tracks, maintain forest cover on erosion- prone soils and run-off pathways, leave harvesting residues on site, avoid whole- tree harvesting]	©	•	•	•	©

0	•	•	0	©
•	0	0	0	0
0	0	•	0	0
0	0	•	0	0
0	•	0	0	0
•	0	0	0	0
•	0	0	0	0
	•			

"Increase the area of forests protected for biodiversity conservation and restoration": Protected areas have shown not to be the most important proxy for biodiversity conservation. To fine tune the answer to this question, quantitative and qualitative information would be needed (which increase? where?), as well as information and what activities would still be possible to undertake in such areas.

There is concern about the development of biodiversity within the Union, including forests. KSLA shares this concern and wants to emphasise that a successful approach to maintain or enhance biodiversity need to consider the entire landscape, not just protected areas. Strict protection and developed forest management methods are complementary measures. A variety of measures are needed, based on, and taking into account the natural conditions in different parts of the EU. This is an important area of knowledge to reach the biodiversity targets in a resource-efficient way.

"Manage protected forests more effectively, so that they achieve their nature conservation objectives": What does "manage more effectively" mean?

"Protect forest soils and prevent soil degradation, in particular on carbon-rich soils": There are already many national legislative requirements aiming at considering soils aspects when managing forests. In addition, the soil issue is wider than the forest sector.

"Increase the use of biodiversity-friendly forestry practices [e.g. increased deadwood, habitat trees, reduce the use of pesticides and fertilisers": These practices are already part of the tools box of sustainable forest management implemented at local level. How could the "increase" of these practices be implemented from an EU level: baseline to define the increase? where? types of forests? etc.

"Take measures to align wood demand and consumption with forests' sustainable production capacity": Clarification would be needed on what "sustainable production capacity" exactly means in the context of the question. Wood consumption is needed and will be even more needed to achieve the 2050 EU carbon neutrality objective. In this context, measures to increase wood mobilisation of EU forests may be needed since forest's sustainable production capacity can still be increased in certain regions of Europe.

Other:

- 1) Biodiversity, adaptation to climate change and carbon sequestration are three different topics that would have worth being addressed separately to make the questions and answers clearer. There is also a conflict of aims between biodiversity-related measures and measures for increased carbon sequestration that require trade-offs and that make it difficult to choose alternatives on some of the questions. This conflict of aims is an important area for more research and compilations of knowledge before setting targets and deciding on measures.
- 2) The list of entries proposed in this question is very detailed when it comes to forest management decisions and does not reflect the fact these items are under Member States responsibility in defining their national forest policy and legislations.

Forests are of great importance in mitigating climate change, but the contribution to mitigating climate change is not limited to the question on how to strengthen carbon sequestration. A system approach with connections to other sectors is necessary.

The connection between forests capacity to sequester carbon and the best strategy for climate mitigation is a much-debated issue. KSLA has discussed this issue in different ways. For more information, see attached pdf.

EU/NATIONAL SUPPORT AND INSTRUMENTS

Q4 What should be done to facilitate access to, and improve the use of, EU and national funds for forest management and forest-related activities?

e.g. agriculture and rural development, research, LIFE, cohesion and regional development policy, Invest EU, Recovery and Resilience Facility, Union Civil Protection Mechanism Grants etc.

covery and resilience racinty, emon envir rote	very important	important	slightly important	not important	l don't know
reduce administrative burden and relax the conditions for accessing funds	0	0	0	0	0
promote funding opportunities more proactively in order to raise awareness	0	0	0	0	0
help local and regional actors with their funding applications	0	0	0	0	0
national or regional authorities should prioritise forests in budget allocation and expenditure in rural development programmes, cohesion policy funding, Invest EU, etc.	©	•	0	©	0
make sure that funding options match the needs of forests and the forest sector, and allow these to be addressed locally	•	•	0	0	0
raise the EU co-funding rates for forest projects and measuresv	0	0	0	0	0
introduce more possibilities for Member States to use State aid for forestry	0	0	0	0	0
develop new financial instruments for forests	0	0	0	0	0
other (please specify in the comments box below)	•	0	0	0	0

comments

EU shall neither decide on nor finance a common forest policy with direct support for various forestry measures in the way that is done for agriculture in the Common Agriculture Policy. If an individual member state chooses to have such a policy, it should take place within the framework of the state aid rules. However, various indirect forms of support for rural development within the framework of Pillar Two are still important and should be directed towards competence development and research, as well as risk management.

KSLA proposes the following overall priorities for rural development policy in the forest strategy:

- Ensure sustainable management, in line with Agenda 2030.
- Promote an efficient use of resource and the transition to a low-carbon, circular bioeconomy. (through integration of the EU Bioeconomy Strategy).
- Promote social inclusion and economic development in rural areas.

An appropriate way to organize forest-related measures within the framework of Pillar Two is by National Forest Programs. Examples of measures that Member States may include in their programs within this framework cover the following areas:

- Knowledge transfer, advisory and information measures. (education, information campaigns, etc.)
- Investments in the prevention of forest damage as a result of forest fires, natural disasters and other disasters, e.g. pest and disease infestations and climate threats.
- Investments in research and development of forest management and forest genetics in a changing climate.
- Support for services for environmentally and climate-friendly forestry and forest protection.
- Risk management tools: Joint funds used in the event of severe climate events, preventive and early detection of forest fires and pests.
- Support for measures that promote public recreation and accessibility and thus health and well-being, not least in urban and peri-urban areas.

KSLA underlines that the decisions to whether to establish national forest programs or not are and should continue to be the competence of the member states.

A difficult question is whether and how support measures should be designed for forest owners who suffer damage on their forests as a consequence of climate change. KSLA believes that forest ownership, like other forms of business, is also about managing risks and that it is to a large extent possible to protect oneself from the financial consequences of these risks through insurance. However, the member states and the EU have a responsibility to design legislation, information and advice, fire monitoring, joint resources for firefighting and monitoring of pests, etc. to reduce the risks.

FOREST-RELATED CHALLENGES FACING FOREST-BASED INDUSTRIES

Q5 What are the main forest-related challenges facing the forest-based industry sector in your country and/or the EU today?

	very challenging	challenging	slightly challenging	not challenging	l don't know	
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lack of skilled labour force	0	•	0	0	0
unclear forest policy objectives and regulatory framework	0	•	0	0	©
uncertain availability of wood resources	0	•	©	0	©
competition between bioenergy and other wood uses for biomass	0	0	•	0	0
lack of information on effective standards guaranteeing sustainable sourcing	0	•	•	•	©
lack of price premium for sustainable products	0	0	•	0	©
matching of value chains' needs to available forest resources in the EU [e.g. small properties; irregular supplies; diversity of species, qualities and dimensions; diverse stands; proliferation of hardwoods in some countries]	•	•	•	•	©
lack of clear, comparable and comprehensive information on the state of EU forest resources and current trends	•	0	0	•	0
other (please specify in the comments box below)	•	0	0	0	0

The biggest challenge for the Swedish forest industry is to continually develop productivity and quality in processes and products in order to maintain or strengthen its global competitiveness. Given that timber in the Baltic Sea region is one of the most expensive in the world, this includes continually improving the efficiency of forest management integrated with the development of sustainable forestry. Unlike many other countries, some Swedish forest companies have large own land holdings, so this development does not only apply to private forest owners.

Thanks to the high quality of the products, the Swedish forest industry competes in markets with high standards of living and high insight on the need for sustainable development. The market for Swedish forest industry products is global with about 70% of sales to the EU 27 and the UK. The concept of sustainable development is a moving target as it develops over time. This leads to a need to be at the forefront of interpreting the views of the relevant markets and consumers.

The Swedish forest industry has for decades and through extensive investments worked with increased resource efficiency. This includes taking advantage of and developing the use of energy from by-products that arise in the forest and forest industry value chain. Any changes to the EU regulations for bioenergy, which are mainly driven due to question marks linked to land use and production in third countries, could have a major impact on the Swedish forest industry sector and Swedish energy policy. A challenge for the forest-based industry sector in EU is the pressure that climate change puts on the forest ecosystems which already threat's wood-supply in some regions and in the long term might threatens our forests productivity.

PROMOTION OF WOOD PRODUCTS

Q6 What could be done to promote the wider use of sustainable wood-based products and boost their recycling rates?

	very important	important	slightly important	not important	l don't know
support consumer choices by providing better information on the environmental footprint of wood products compared to non-wood alternatives	•	0	0	0	0
improve the exchange of best practices and promote training on sustainable uses of wood products (e.g. for architects)	•	0	0	0	0
support research on new and innovative wood-based products	•	0	0	0	0
improve communication methods and demonstrate sustainable forest management in the provision of raw materials for wood-based products	•	0	0	•	0

quantify the economic value of the contribution of wood to carbon sequestration, e.g. through carbon removal certificates	0	0	•	0	0
promote the use of local and sustainable wood products in public contracts	•	0	0	0	0
promote investment in improved designs of wood-based products that allow easier recycling and re-use	•	0	0	0	0
incentivise the use of recycled material in wood-based products	0	0	•	0	0
promote sustainable wood products by changing the rules on accounting for their carbon storage capacity in national climate targets	•	0	0	0	0
other (please specify in the comments box below)	0	0	0	0	0

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CERTIFICATION AND LABELLING

There are several certification schemes and labelling schemes in the EU for the forest-based products. We would like to gauge how well-known they are and how useful they are in supporting consumer or business decisions

[e.g. certification schemes FSC, PEFC and labelling shemes EU ecolabels and Eco-Management and Audit Scheme]

Q7 To what extent do you know of/use tools that certify the sustainability of forest products (forest certification, product labelling)?

at most 1 choice(s)

I don't know of any labelling or certifying systems for forest-based products
 I do not trust the existing labelling and certification systems and I would like that the EU does something about it
 I always buy certified wood-based products with labels demonstrating they come from sustainable sources
 I buy labelled/certified products if there is not a significant price difference vis-à-vis non-certified products

certification/labelling is sometimes an important criterion driving my decision
to buy a product
In my purchasing decisions, I am more likely to trust certified products from
EU forests

The question is citizens oriented. KSLA can therefore not provide an answer.

FOREST INFORMATION AND MONITORING AT EU LEVEL

In view of the multiple services that forests provide, the numerous sectors that rely on forests and the threats to forests that are exacerbated by climate change, the 2030 biodiversity strategy refers to 'the need for a better picture of the health of European forests'. In this regard, there are plans to develop the Forest Information System for Europe (FISE).

Q 8 What should be done to improve forest data, knowledge and monitoring of EU forests?

	very important	important	slightly important	not important	l don't know
improve the Forest Information System for Europe (FISE) so that it becomes an EU forest monitoring system that integrates climate, biodiversity, resilience and risks, economic and social data	•	•	•	©	0
assess forests' climate risks and vulnerabilities	0	•	0	©	0
improve and harmonise the monitoring of condition, pests and diseases, and other forest –related risks	•	0	0	0	©
improve the monitoring of forest biomass	•	0	0	0	0
improve the monitoring of forest biodiversity, including genetic diversity, and the availability of spatial analyses (e.g. maps of deadwood levels, maps of protected forest habitats)	0	•	0	0	0
produce regular short analyses on key subjects (e.g. resilience of specific types of tree, results of key scientific articles, use of forest biomass resources)	•	•	•	•	•

prepare more in-depth assessments of forest ecosystem services	0	0	•	0	0
make better use of <u>Copernicus data</u> to monitor EU forests (e.g. by diversifying and making more regular forest products available)	•	0	0	0	0
further work on the harmonisation of national forest inventories	0	0	0	•	0
facilitate the integration of remote-sensing data with forest inventories and other field assessments	0	•	•	0	0
improve the governance of FISE and involve Member State experts and other stakeholders in future developments	•	0	0	0	0
other (please specify in the comments box below)	•	0	0	0	0

There is a great need for reliable and comparable data on EU forests. At the same time, forest conditions vary widely within the EU and national data and monitoring needs vary between member states.

To create a basis for comparable data, it is important to harmonize which data is to be collected and with which resolution. This should be done in a way that does not increase administration and costs in the Member States. Cooperation with UNECE, FAO and Forest Europe, which also collect forest data, should take place.

The development of satellite-based GIS systems is currently rapid. However, it is important to realize that these have their limitations and that they must always be calibrated with national forest inventory data before they are used for analyses and policy follow-up.

Forest damage is increasing in Europe. A European cross-border system is needed to gather information on these and to be able to work across countries with countermeasures.

ENSURING CONSISTENCY WITH INTERNATIONAL AGREEMENTS AND SHOWING GLOBAL LEADERSHIP

The future forest strategy will help the EU to meet its international commitments and will form the basis of a clearly established, consistent and holistic approach on forests, allowing stronger EU leadership internationally (in the context of the 2030 sustainability agenda, the Paris Agreement, the Convention on Biological Diversity and the Convention to Combat Desertification). The 2019 Communication on Stepping up EU action to protect and restore the world's forests (2019) established a framework for the EU's global action; this must be properly and consistently reflected in the formulation of domestic policies.

Q 9 In order to ensure consistency with international commitments and to support the EU's international leadership, the new EU forest strategy should ...

	very important	important	slightly important	not important	l don't know
in relevant fora, set out the EU's positions, approaches and values in favour of sustainable forest management worldwide	•	0	0	0	0
promote experience and lessons learnt at EU level	•	0	0	0	0
ensure consistency between the EU's domestic policies and trade agreements	•	0	0	0	0
ensure consistency between EU development/international cooperation and the EU's neighbourhood policy	©	•	0	0	0
strengthen international cooperation to implement the UN 2017-2030 strategic plan for forests	0	•	0	0	0
other (please specify in the comments box below)	•	0	0	0	0

comments

Promote the finalization of the Pan European Legally Binding Agreement (LBA)

PLANTING AT LEAST 3 BILLION ADDITIONAL TREES IN THE EU BY 2030

Trees are the source of multiple benefits – providing clean air, absorbing CO2 from the atmosphere, providing habitats and supporting our economy, livelihoods and physical and mental well-being. The new forest strategy will include a roadmap for planting at least 3 billion additional trees in the EU by 2030.

Q 10 Where should the 3 billion+ additional trees be planted?

at most 4 choice(s)

- afforestation of productive agricultural land
- afforestation of degraded land

[e.g. areas subject to erosion and landslides; areas at risk of desertification; areas deforested and/or overused in the past; contaminated industrial or mining sites; other degraded land]

1	tree planting in upper water catchments to delay and reduce downstream
	flooding
	tree planting on grasslands (except for high nature-value grasslands)
	tree planting in (peri-)urban areas
1	tree planting for agroforestry, including orchards
	tree planting as landscape features to foster connectivity (hedges, rows of
	trees, copses, etc.)
	tree planting along infrastructure corridors (roads, waterways)
1	tree planting as part of forest restoration
	other (please specify in the comments how below)

When selecting the sites and species, it is also important to plan the whole rotation period of the forest site and anticipate potential management needs and whether the trees will have a demand in future to become harvested wood products or if they will be planted for other purposes.

Q 11 What are the main challenges in planting additional trees in your country?

	very challenging	challenging	slightly challenging	not challenging	l don't know
finding appropriate spaces in urban and peri-urban areas	0	•	0	0	0
finding appropriate spaces in rural areas	•	0	0	0	0
capacity of tree nurseries to produce and provide the required materials	•	0	0	0	0
lack of skilled workforce	0	•	0	0	0
lack of administrative and support /advisory services	0	0	•	0	0
ensuring plant health and genetic diversity in nurseries	0	•	0	0	0
forecasting future climate conditions and matching tree species/genotypes	•	0	0	0	0

barriers to the transnational production and transfer of forest reproductive material (in particular for climate change adaptation)	•	•	•	•	•
financial resources for planting and maintenance in (peri-)urban areas	0	•	0	0	0
financial resources for planting and maintenance in rural areas	0	•	0	0	0
loss of farmland value after conversion to forest land (i.e. opportunity costs)	0	0	0	0	0
local acceptance and/or administrative procedures	0	0	•	0	0
ensuring that land remains planted with trees for a long period	0	0	0	•	0
unfavourable climatic conditions (e.g. water scarcity)	0	0	•	0	0
other (please specify in the comments box below)	•	0	0	0	0

Planting 3 billion trees is a hugh and long-term commitment and it is of course important that they are well adapted to the ecological conditions and to the expected future climate conditions where they will be planted.

KSLA welcomes the proposal of planting 3 billion new tress in light of the fact that it highlights the importance of the green sector and its benefits in the EU. On an annual basis Swedish nursery deliver 380 million seedlings, most of them planted domestically. Reforestation is mandatory by law since 1903. Even if limited there is room for an increased forest area in Sweden. An open question is how the 3 billion trees will be distributed among member states. Should it be based on the share of land area or population? Regardless of how the member states themselves should decide on how they will manage their share of the programme.

Even if the land area of Sweden already to 70 % is covered with forests there are possibilities to increase the area and the future growth. A study commissioned by the Swedish Government made by the Swedish University of Agriculture Sciences 2009 investigated the potential. The potential presented by intensive. forestry on abandoned agricultural land is limited by the availability of land area; at most there is about 0.4 million ha that can be used for this purpose. Intensive forest management on 400,000 hectares of abandoned arable land can provide an additional 6 million cubic meters in felling annual. www.slu.se /globalassets/ew/org/inst/esf/forsoksparker/asa/mint-rapport.pdf.

Q 12 How could the EU encourage the wider use of forests for the health and well-being of all?

	very important	important	slightly important	not important	l don't know
encourage greater uptake of funds for activities promoting health and well-being (e.g. eco-tourism, improved access to urban and peri-urban forests, recreation, etc.)	•	0	•	0	•
raise awareness of the health benefits of forests	•	0	0	0	0
promote more research on forests and associated health benefits	•	0	0	0	0
encourage forest-related educational opportunities	•	©	0	©	0
promote the exchange of best practices and other communication efforts on the multiple roles of forests	•	0	0	©	0
facilitate public access to all types of forests	0	0	0	0	0
other (please specify in the comments box below)	•	0	0	0	0

comments

The issue of increased public access is not relevant in the case of Sweden, since there is a right of public access in the country, which also applies to private holdings. There needs to be an integrated perspective on the physical landscape, where forests are considered together with other types of landscapes as appropriate, especially as there are fuzzy boundaries between.

Q13 Increasingly, consumers can compensate for the CO2 emissions associated with their purchases (e.g. flights, concerts, etc.) by paying a supplement that will be used by a private undertaking to plant trees in the EU or elsewhere. Have you ever done this?

only one answer allowed

- Yes, I have often compensated some of my greenhouse gas (GHG) impacts with tree planting schemes
- Yes, I have occasionally compensated some of my GHG impacts with tree planting schemes
- No, but I'm considering it

- No, because I don't believe that the trees will be planted
- No, because I don't believe that the trees will be monitored over a sufficiently long period
- No, I haven't

The question is citizens oriented. KSLA can therefore not provide an answer.

ADDITIONAL FEEDBACK

Should you wish to provide additional information (e.g. a position paper) or raise specific points not covered by the questionnaire, you can upload additional documents here.

Please note that any uploaded documents will be published alongside your response to the questionnaire, which is the main input to this consultation. The document is optional and serves as additional background to help us understand your position.

additional information and comments

The forest, forestry and forest value chains can in many areas contribute to the European Green Deal and the ambitions to transform the European economy into a sustainable future. The increased importance that forest issues thus receive requires a coherent strategy. It must be seamlessly linked to other strategies within the EU to achieve goals of climate, energy, biodiversity, economic development, etc.

It is important to have a good knowledge base, based on science and practical experience. At the moment, there is a policy-development going on in the EU regarding forest management systems. In this context, it has become obvious that the knowledge within the EU about conditions in boreal countries needs to be improved.

KSLA as an Academy promotes an evidence-based view for decision-making and want to high-light a recently published study, as an example: Large differences in plant nitrogen supply in German and Swedish forests – Implications for management. Peter Högberg et al, Forest Ecology and Management https://www.sciencedirect.com/science/article/pii/S0378112720316686. The authors ask if the differences in N-supply are too large in different parts of Europe to make one system of management for wood production, continuous—cover forestry or rotational forestry, optimal across these conditions. The results speak against the use of a single management method in the studied countries, Sweden, and Germany.

The study highlights an important issue. Differences between different biomes within the EU and between different tree species are important to consider when designing guidelines for sustainable forest management.

Finally, KSLA would like to make some critical reflections on the purpose of this consultation:

• The survey touches many questions, big and small, and all can be important from different perspectives and in different contexts. Responses to this sprawling survey from various stakeholders cannot be used to give legitimacy to the strategy. The survey's approach, to assess the significance of various issues, is highly questionable. What is needed today is hardly more objectives, but trade-offs between

objectives.

- Agenda 2030, and the 17 goals with 169 sub-targets should be a clear starting point for the strategy.
- The large variations within Europe and at regional and local level must be considered, so that the strategy does not result in sub-optimization or deteriorating conditions for sustainable development.
- It is important to develop forms of dialogue and co-creation of knowledge about the forest because so many different interests are affected. Dialogue should not stand in opposition to scientific knowledge and proven experience, both are necessary. There are many different aspects to consider, and these relate to different perspectives and knowledge bases. This complexity requires a broad and inclusive approach, in which knowledge and opinions are distinguished as far as possible.

please upload your additional documents

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

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Contact Form



THE ROYAL SWEDISH ACADEMY OF AGRICULTURE AND FORESTRY

Supplementary to Q3

The connection between forests capacity to sequester carbon and the best strategy for climate mitigation is a much-debated issue. KSLA has discussed this issue in different ways.

The international conference Forests and the climate

In 2018, KSLA, together with The Royal Swedish Academy of Sciences (KVA) and The Royal Swedish Academy of Engineering Sciences (IVA), organised a 2-day international conference titled Forests and the climate: Manage for maximum wood production or leave the forest as a carbon sink https://www.ksla.se/wp-content/uploads/2018/12/KSLAT-6-2018-Forests-and-the-climate.pdf. The conference built on an earlier event on the same topic, organized by KVA and KSLA, a roundtable discussion of the European Academies' Science Advisory Council (EASAC) report titled Multi-functionality and Sustainability in the European Union's Forests, which was launched in mid-2017.

The conference aimed to facilitate dialogue among experts representing different views related to forest management and climate change mitigation, to help advance scientific understanding. Another objective was to identify knowledge gaps and priorities for future research and data collection. The conclusions from the conference can hopefully guide policymakers in their endeavours, there remain significant gaps in our knowledge, which need to be filled by further research and collaborative activities.

Committee for Climate and Land use towards 2030

The KSLA Committee for Climate and Land use launched a report in May 2020 https://www.ksla.se/pdf-meta/?pdf_id=41739&category=publikationer.The committee concluded that the issue needs to be consider with a system perspective and the answer depends on the choice of policy horizon and on how spatial and temporal aspects are considered in different studies. The conditions also vary with different forest conditions, such as age distribution.

In the short term, reduced felling leads to increased carbon dioxide uptake and if you compare with a reference-alternative that keeps the forest growing you might reach a carbon-debt situation. But the above analysis is inadequate since it does not include the connections to material- and energy markets. The storing strategy also includes a risk that the stored carbon is released to the atmosphere due to draught, storms, diseases, insects, and fire.

If you consider the entire landscape and the connections to the markets for materials (carbon storage) and energy (substitution) you will come to another conclusion. Then the most efficient long-term climate mitigating strategy is characterised by a high forest growth, healthy forests with low damage rates, and thus a high carbon storage and a harvesting level balanced to maintaining or increasing the forest's carbon stock. This creates a flow of rawmaterial that can store carbon or replace more carbon dioxide-intensive products and fossil energy.

The EU climate framework should acknowledge carbon sinks as well as carbon stocks in products and the effects on reduced emissions in other sectors (substitution).

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