
Feedback to the review of rules on Land use, land use change & forestry

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The European Woodworking Industry is fully behind the objectives of the European Green Deal, and it is committed to its objectives of climate neutrality, circular bioeconomy, resource efficiency, economic growth and employment creation. Our Industry uses timber legally sourced out of sustainable managed European forests (approximately 90%). When timber is imported, our traders are committed to the highest supply-chain controls system in order to ensure sustainability and legality.

The EU Woodworking Industry offers the potential to decarbonise key economic sectors such as construction in line with the Green Deal objectives. Timber buildings are globally recognised as key allies in climate change mitigation strategies: they represent an immediate way to achieve long-term carbon storage in products - as mentioned in the 2020 Circular Economy Action Plan - and they allow to reduce the use of energy-intensive materials, which could lead to 100 Mt CO₂ savings in Europe, according to a recent European Forest Institute [report](#).

At the time when the European Commission wants to increase the ambition to intermediate 2030 targets, including in the land use, land use change and forestry sector, the following suggestions should be taken into consideration:

- A closer look at the accounting methodologies shows that these relate to defining sequestration in the forests, but do not adequately value the climate benefit of harvested wood products. Wood products have many environmental advantages over non-wood alternatives. The manufacture of wood products requires less fossil fuel than non-wood alternative building materials such as concrete, metals, or plastics. Moreover, use of wood products also results in emission saving where wood processing residues are burned for energy displacing fossil fuel. By nature, wood is composed of carbon that is captured from the atmosphere during tree growth. These two effects—**substitution and storage**—are why the carbon impact of wood products is favourable.
- The **substitution** of fossil-based materials with bio-based ones (e.g. use of wood in construction and in renovation) should be better incentivised, as also acknowledged in the Inception Impact Assessment. While anthropogenic emissions and removals in the forest are captured in current the LULUCF accounting framework, it is more difficult to visualise the mitigation effect of forest-based substitution of fossil materials. This makes it complex to assess the climate benefit of circular bioeconomy in an integrated way and its enabling potential. According to [some estimates](#) the overall substitution effect of the European forest-based industries amounts to 410 Mt CO₂ e/yr. Such benefit should be visible and explicitly recognised in the relevant sectors, such as construction and renovations.
- One way to incentivise the use of long-lived harvested wood products could be by issuing **carbon credits** for the carbon stored in HWP or for emissions forgone for using wood rather than fossil-based materials. Credits should be granted on the basis of all emission savings associated with wood products, storage during the life time of the product and after disposal in landfill.

- On the **policy options** suggested in section B: regardless of the option, the impact on harvest levels and the raw materials availability for the bioeconomy should be carefully assessed. In general, caution should be used in considering forest sinks as a way to offset emissions from other sectors, since ageing forests are vulnerable to climate change themselves, and active forest management is needed to prevent the ever-increasing damages caused by fires, storms, pests and other disturbances. Additionally, the carbon certification system should not indirectly increase the costs of raw material. For this reason, the European woodworking Industry calls for an impact assessment of the expected carbon certification system on the EU forest-based Industries. The Woodworking Industry recalls that the environmental benefits associated with the carbon certification system may not be realised if such a system will de facto favour emission intensive industries at the expenses of the lower emission competitors.
- Explore the potential of **agroforestry** specifically and **more trees on farms** generally both in significant woodlands and in hedgerows, along boundaries etc. The purpose of more agroforestry and more trees on farms generally would be drive up the amount of timber and woody feedstock available for the bioeconomy in its widest sense. For instance, agroforestry is well placed to produce short rotation energy crops enabling forest production to focus on producing the material for longer life harvested wood products.

CEI-Bois, the European Confederation of the Woodworking Industries, numbers 16 national organizations, 4 European Sector Federations as well as 1 Private Industrial Group. It is the organization backing the interests of the whole industrial European wood sector: close to 180.000 companies generating an annual turnover of 152 billion euros and employing 1 million workers in the EU.