



Joint Forest-based sector's considerations on the LULUCF Plenary vote

Brussels, 3 June 2022

European forests and the forest-based sector play a key role in achieving the EU climate neutrality target by contributing to a fossil-free bioeconomy while keeping forests healthy due to active and sustainable forest management.

This is why the European forest owners, managers and industries would like to share some considerations ahead of the vote on the revised Regulation on the accounting of greenhouse gas emissions and removals from Land Use, Land Use Change and Forestry (LULUCF), which will take place on Wednesday 8 June.

- **Keep the EU sink target for 2030 at an ambitious but realistic level and reject any additional targets**

The Commission's proposal to achieve net removals of 310 Mt CO₂ equivalent at EU level by 2030 is already an ambitious target which would require the LULUCF sector to increase the sink by an additional 42 Mt CO₂ equivalent compared to current levels in less than 10 years. Already to reach this target Member States may have to decrease their harvesting levels, with possible severe consequences on the economic viability of the entire sector and on forest-based climate solutions which are needed in the long-term. LULUCF must not be a tool to regulate Member States' harvest levels which is determined by national legislation in a much broader context. Also, voluntary carbon farming practices – including certification for carbon removals – are in a key role to reach the 310 Mt CO₂ target, which would require member states to develop their carbon farming practices.

- **Support the separation between LULUCF and non-CO₂ emissions from agriculture**

The forest-based sector supports the outcome of the vote in the ENVI Committee on the separation between the accounting of non-CO₂ emissions in the agricultural sector and the emissions and removals in the LULUCF sector. An integration of the two sectors would likely shift on forest land most of the burden to reach climate-neutrality in the sector.

- **Keep the focus of the Regulation on climate goals**

The introduction of the “do no significant harm” principle and detailed biodiversity-related objectives such as the “minimum criterion for the inclusion of biodiversity monitoring in



land monitoring system” risks diverting the focus of the Regulation from its main goal, which should be to achieve climate change mitigation by land management practices. Biodiversity conservation objectives are enshrined in other areas of current and upcoming EU policies and legislation.

- **Recognise all relevant bio-based product categories**

European forests and the forest-based sector provide wood, a renewable raw material and a strategic resource that can be used for creating reusable and recyclable materials. This sector can help transforming strategic sectors, such as construction, textiles or packaging industries towards a more circular system with a reduced environmental footprint.

The European forest-based sector supports the Commission’s proposal to extend the category of Harvested Wood Products (currently paper, wood-based panels and sawn wood) to further categories of “carbon storage products”. To enable the best possible climate mitigation and adaptation potential from wood-based products, the forest-based sector supports the provision voted in the ITRE committee on including “*all sustainably sourced carbon storage products of all relevant bio-based product categories, including innovative bio-based products, by-products and residues substituting fossil fuel based raw materials that have a carbon sequestration effect*”. This formulation and the corresponding plenary amendment 95 should be supported instead of the ENVI amendment on Art. 9, which takes a too narrow view on the role of the forest sector in the transition to a green and resource-efficient economic system.

The undersigned organisations remain available to provide more detailed explanations:

CEI-Bois – The European Confederation of Woodworking Industries

CEPF – The Confederation of European Forest Owners

CEPI – Confederation of European Paper Industries

EOS – The European Organisation of Sawmill Industry

EUSTAFOR – European State Forest Association