

# EU 2030 Biodiversity Strategy

## POSITION PAPER

### Executive Summary

The Swedish Forest Industries Federation (SFIF) represents the Swedish forest industries, which refine wood resources to bio-based products, such as pulp, paper, board, packaging material, sawn timber, refined wood products and advanced biofuels. The core business for SFIF members is industrial activities based on wood sourced from sustainably managed forests. Among SFIF members are also some of the largest private forest holdings in Europe and forest related European Union policy is therefore of high importance.

SFIF members take pride in managing their forest holdings sustainably. Historically, the focus was on reforestation and intensive silviculture, resulting in a successful doubling of the Swedish forest stock from the early 1900's until today. In the same period, an equivalent of four times the original stock in 1923 has been harvested. Since the early 1990s, a broader perspective on sustainability, also including biodiversity and social aspects, has been prevailing. Maintaining and enhancing biodiversity is today an integral part of SFIF members' forest management. By engagement in forest certification, Sweden has become one of the largest suppliers of wood from sustainably managed forests.

When analyzing the EU 2030 Biodiversity Strategy from a forest owner and forest-based industries perspective, SFIF experiences that there is a lack of overall holistic policy perspective. Furthermore, questionable starting points risks leading to unnecessary, costly and counterproductive measures. SFIF also experiences that Member State competence on forest related policy is clearly at the risk of being infringed and that the European forest-based sector is not acknowledged for its sustainable forest management. Finally, SFIF concludes that science-based and well-established definitions are missing for parameters intended to contribute to objectives being met.

SFIF therefore encourages the European Parliament and Member States to:

- Secure that EU policy emerging from the Strategy is not counter-productive but balanced versus other policy instruments, which are equally essential in reaching the European Green Deal objectives.
- Clarify that EU policy emerging from the Strategy is to be based on actual European conditions and preferably with higher resolution than that, i.e. Member State and/or regional conditions.
- Define that forest production and protection objectives can be met simultaneously and are not in contradiction.
- Encourage the development of adequate biodiversity monitoring systems catching trends and developments.
- Emphasize the long-term perspective needed when working with forest biodiversity.
- Secure Member State competence on EU policy directly or indirectly affecting forests and forestry.
- Acknowledge and further emphasize the sustainable forest management carried out daily by European forest owners, and its great importance for sequestering carbon dioxide in well-managed forests and delivering products that store carbon and substitute other products based on fossil raw materials.
- Put the forest owners at the core of the Strategy and work with them in further developing sustainable forest management.
- Secure the status of the Standing Forestry Committee.

- Secure that protection targets encompass a wide range of conservation efforts and areas, including those managed according to good forest stewardship.
- Assure a fair protection target burden-sharing between Member States considering the difference in definitions and methodologies in relation to forest land and protected forest.
- Acknowledge Member State lead on work related to conservation and protection of habitats and species, as there is no one-size-fits-all due to the variety of European forests.
- Refer any work on definitions, concepts of importance for objectives to be met and guidelines to Member States.
- Secure that the revised EU Forest Strategy is a stand-alone policy.

## **The Strategy lacks important overall holistic perspective and could hamper forests' contribution to sustainable development**

SFIF experiences that the Strategy has been developed too much in isolation focusing on biodiversity and not enough considering interactions with other policy areas. The targets to legally protect at least 30% of the EU's land area and to strictly protect at least a third of this will result in more forest being set aside and less being available to contribute to sustainable development's economic and social as well as environmental goals.

The European Green Deal aims to create "a fair and prosperous society, with a modern, resource-efficient and competitive economy where there are no net emissions of greenhouse gases in 2050 and where economic growth is decoupled from resource use". To reach these objectives, the EU must manage its forests actively and well and wood resources must be converted to bio-based products. If forests instead would be less managed, EU's ability to reach the Green Deal objectives would be hampered, as it is the revenues from management which enable investments in for instance increased growth, enhanced carbon uptake, biodiversity enhancement and reforestation.

To further exemplify, once implemented, the Strategy will result in more forest area being set-aside. That will reduce forest-based products ability to replace fossil-based and emission intensive alternatives. To secure the forest-based sector's contribution to climate change mitigation, remaining forest areas would have to be managed more intensively, which could have a negative impact on biodiversity. In this context, it is important to understand that setting-aside more areas is not a universal method – on the contrary, it will inflict negatively on other Green Deal objectives and increase the level of conflict. Furthermore, more setting-aside of forest area in Europe could also increase demand for timber and wood-based products from other parts of the world, most likely produced in a less sustainable manner. In the long run, more setting-aside could increase the use of fossil resources for materials and energy, in other words, completely counter-productive versus the European Green Deal objectives.

SFIF would have appreciated if the Strategy had defined three fundamental things. Firstly, that forest production and protection objectives can be met simultaneously. Secondly, that biodiversity can thrive also in managed forests and thirdly, that the EU climate-neutrality objective requires heavy investment in forest growth and increased availability of wood raw material.

Based on the above, SFIF encourages the European Parliament and Member States to:

- Secure that EU policy emerging from the Strategy is not counter-productive but balanced versus other policy instruments, which are equally essential in reaching the European Green Deal objectives.

## **The Strategy's starting points are questionable**

The Strategy defines objectives and the way forward for the European Union's work on maintaining and enhancing biodiversity. For the Swedish forest industries, this translates into measures to maintain and enhance forest biodiversity. For the Strategy to be relevant and effective, SFIF argues that it needs to be based on correct starting points.

To a large extent, the Strategy problem description is built on the global biodiversity situation. SFIF agrees that there is a global biodiversity crisis and this, together with the COVID-19 crisis, has been used to argue that nature should be given more space. SFIF would have expected a more tailored approach to European forests, which are in a better state than the global average. For instance, the area of forested land in Europe has increased during the last three decades, in sharp contrast to for instance the situation in Asia and Africa. Furthermore, Europe

contributes to nearly 40 percent of the certified forests in the world, where Sweden contributes to about 20 percent of EU certified forests. In addition, the area of forest biodiversity intactness is large, most notably in northern and in mountainous parts of Europe<sup>1</sup>.

The Strategy jumps from the global context to defining objectives for Europe, whose impacts have yet to be thoroughly assessed from an environmental, economic and social perspective. SFIF argues that the EU should inspire and lead on sustainable forest management, but with this Strategy it risks diminishing the forest-based sector's contribution.

To exemplify, in section 1, it is stated that "... nature is in a state of crisis". This might be a case on a global scale, but SFIF does not agree that this statement is relevant for Swedish forests. On the contrary, the amount of structures and elements important for biodiversity, such as dead wood, old forests and old, coarse deciduous trees have increased during the last decades. This has been achieved by a combination of measures, such as nature protection being incorporated in all forest management practices and increased voluntary set-aside of land complementing state-owned forest reserves. Furthermore, biodiversity is by nature managed more locally and regionally rather than globally, why a global perspective applied to EU policy will not work. In this regard, biodiversity differs from for example climate change, where local, regional and national efforts clearly can contribute to global mitigation.

In section 2.1, the Strategy defines that "Biodiversity fares better in protected areas". When applied on forests, SFIFs disagrees on this statement for two reasons. Firstly, it implicitly suggests that biodiversity cannot thrive in managed forests and that is incorrect. As mentioned above, in Sweden the amount of important structures and elements for biodiversity have increased since the latest revision of the Swedish Forest Act in 1995 and also large-scale introduction of certified forest management. Secondly, the statement implies that forest production and biodiversity objectives are in contradiction to each other, while SFIF argues that both can be met simultaneously, and that responsible forest management reduces the need for formal protection. Since the mid-1990s, retention forestry is the most common used forest management model in Nordic countries. The model try to recreate natural elements such as dead wood and old trees in the production forest. Estimations in Sweden show that the volume of set aside trees in production forest will be double the amount of the trees set aside in protected areas by 2050.

Measuring biodiversity is hard due to complexity, scale and time lag and to a large extent, the Union lacks common monitoring systems that could accurately present species status and development over time. Furthermore, data availability also differs widely between Member States. This means that a starting point for biodiversity status is often lacking. Despite this complication, the Strategy includes hard targets on how species and/or habitats are to develop going forward. It is for SFIF very unclear how fulfillment of the objectives can be measured when adequate monitoring systems catching trends are largely missing. SFIF further argues that differences in data availability reinforces the need for Member State specific indicators and objectives.

The Strategy disregards that when working with maintaining or enhancing biodiversity, a time lag always exists. Actions taken today, for instance in relation to conservation status of certain species, do not directly give positive effects – instead it can take several decades. By setting objectives or using indicators with a short time perspective, such as until 2030, you are actually not working in line with the long-time perspectives in forest

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<sup>1</sup> Hill, et al. (2019). Measuring Forest Biodiversity Status and Change Globally. <https://doi.org/10.3389/ffgc.2019.00070><sup>1</sup>

management. Instead such objectives and indicators risk being counter-productive and thereby reducing forest owner's engagement.

Based on the above, SFIF encourages the European Parliament and Member States to:

- Clarify that EU policy emerging from the Strategy is to be based on actual European conditions and preferably with higher resolution than that, i.e. Member State and/or regional conditions
- Define that forest production and protection objectives can be met simultaneously and are not in contradiction.
- Encourage the development of adequate biodiversity monitoring systems catching trends and developments.
- Emphasize the long-term perspective needed when working with forest biodiversity.

### **Member State competence is clearly at risk of being infringed**

According to SFIF's opinion, the Strategy clearly "stretches" the European Union's competence on environmental issues in relation to forests and that several of the policy proposals/objectives clearly infringes on Member States' competence on forests and forestry. SFIF argues that Member States must continue to decide policies on forestry and forests, including on their conservation, protection and restoration measures, as in line with the Lisbon Treaty, the EU does not have a common forest policy. The formulation of forest policies is the competence of the Member States with a long history of national and regional laws and regulations based on long term planning.

Based on the above, SFIF encourages the European Parliament and Member States to:

- Secure Member State competence on EU policy directly or indirectly affecting forests and forestry.

### **The European forest-based sector is not acknowledged for its sustainable forest management**

In section 2.2.4 of the Strategy, it is stated that "Foresters have a key role to play in ensuring sustainable forest management and in restoring and sustaining biodiversity in forests" and to that, SFIF agrees, but we cannot find any acknowledgment of the European forest-sector's existing sustainable forest management (SFM) including efforts to improve biodiversity. SFIF argues that the forest owners should be at the core of the Strategy, as it is only the forest owners that can combine management and conservation of biodiversity. SFIF wishes to stress that forest-owning companies have integrated biodiversity measures into their management for decades. This includes for instance, as already mentioned, leaving dead wood, larger broad-leaved trees, and tall stumps, as well as setting aside valuable areas and create structures of primary importance for biodiversity.

In this context, SFIF wishes to emphasize that SFM is an overarching goal for our members. SFM is defined by Forest Europe, the pan-European cooperation consisting of 46 European countries and the European Union. At the EU level, the Standing Forestry Committee has a long experience in reconciling different national characteristics and applying a holistic approach in the implementation of SFM.

SFIF members fully support the SFM concept, which recognizes that forests have economic, environmental, social and cultural values. It is the value assigned to wood when sold as raw material that generates an income for the forest owner/manager. That revenue then pays for maintaining forest growth, extending ecosystem services and

secures that the forest remains a forest. The timber produced in commercial forests, and the value chain that uses this timber, translates into jobs, sustainable well-being also in rural areas and the development of a bio-based circular economy. Investments in sustainable and active forest management are also an effective way to prevent forest damages and to promote the vitality of forests and their adaptation to changing conditions. In other words, in the short-term perspective, wood-based products substitute fossil, non-renewable products and energy. In the long term, SFM increases production capacity, and forests that are more vital and less susceptible to calamities leading to carbon dioxide release.

Based on the above, SFIF encourages the European Parliament and Member States to:

- Acknowledge and further emphasize the important work on SFM which is carried out daily by European forest owners and its great importance for sequestering carbon dioxide in well-managed forests and delivering products that store carbon and substitute other products based on fossil raw materials.
- Put the forest owners at the core of the Strategy and work with them in further developing sustainable forest management.
- Secure and strengthen the status of the Standing Forestry Committee.

### **Nature protection targets must be clarified and reported in a uniform manner**

The Strategy defines that 30 % of the EU's land area is to be legally protected by 2030. Furthermore, at least one third of this, i.e. 10%, is to be strictly protected, including all remaining EU primary and old-growth forests.

SFIF finds the Strategy language on protection unclear, as some areas are to be "legally protected" while others are to be "strictly protected". These terms are already today interpreted and implemented differently in Member States. Furthermore, all areas that are protected or have effective conservation measures are not necessarily legally protected – they can also be set aside on voluntary basis. More than five percent of Sweden's forests are exempted from management on such voluntary basis to preserve and promote biodiversity under forest certification schemes. This must count towards the target for strictly protected forests. SFIF therefore argues that the targets must encompass a wide range of areas, including those managed according to good stewardship.

The Strategy does not define the burden-sharing between Member States in meeting the protection objectives. SFIF emphasizes that the sharing must be based on a principle of reasonable measures and that characteristics of Member States must be considered. The burden-sharing must not restrict the prospect of economic activity and a prosperous living in all parts of the EU also in the future.

Based on the above, SFIF encourages the European Parliament and the Member States to:

- Secure that the protection targets encompass a wide range of conservation efforts and areas, including those managed according to good forest stewardship.
- Assure a fair protection target burden-sharing between Member States considering the difference in definitions and methodologies in relation to forest land and protected forest.

## Defining an EU Nature Restoration Plan requires extensive interaction with forest owners

The Strategy defines that legally binding EU nature restoration targets will be proposed by the Commission in 2021, subject to an impact assessment. Furthermore, the Commission will request and support Member States to ensure no deterioration in conservation trends and status of all protected habitats and species by 2030.

Since this will be the first time that the European Union defines legally binding EU nature restoration targets, the preparatory work and the interaction with relevant stakeholders, such as Member States and forest owners, prior to presenting any proposal will be essential.

SFIF sees that the Strategy raises more questions than answers concerning restoration, such as:

- What areas are to be restored?
- What is to be achieved and why? Is the restoration to focus on improving the forest's carbon uptake or biodiversity? Or both? Depending on answer, actions will differ.
- Who is to define which areas to target? How do we assure that criteria for choosing areas for restoration are science-based? How are the results of the restoration to be judged and by whom?
- What happens to an area once restored? Can management be carried out in a restored forest area? Or must a restored area be conserved? Nature is however dynamic, not static, so the status of such an area will over time by definition change.
- Who is going to pay for the restoration?
- How will Member State and forest type specificities be respected?

From a forest point of view, SFIF suggests that a Restoration Plan is built on a solid scientific basis, which is well-established and respected by researchers knowledgeable in a broad variety of European forest conditions. To exemplify, forest ecology and dynamics need to be defined on a Member State or regional level. Furthermore, definitions, measures and result evaluations should also be Member State and/or region specific. SFM should be the main tool to meet objectives and such management should be adaptive. The Plan must create strong forest owner engagement. It should furthermore define that meeting several objectives simultaneously, such as restoration, climate change mitigation and wood production, is the overarching target.

Concerning ensuring no deterioration in conservation trends and status of all protected habitats and species, as earlier stated, the Union lacks monitoring systems that could accurately present species status and development over time. SFIF also repeats that biodiversity is by nature managed locally and regionally, sometimes nationally, but not globally. Therefore, any objective defined by the Commission to raise the level of implementation of existing conservation legislation must be done in very close cooperation with Member States. Furthermore, such work must be based on a deep understanding that forests vary greatly within Europe. A one-size-fits-all solution therefore does not exist; instead adjustments for local and regional variations is a must and this is best done by Member States.

Based on the above, SFIF encourages the European Parliament and the Member States to:

- Acknowledge Member State lead on work related to conservation and protection of habitats and species. This is of vital importance, as there is no one-size-fits-all due to the variety of European forests.

## Forest relevant definitions and guidelines must be decided on Member State level

The Strategy defines that the Commission is to return on definitions of importance concepts, such as primary forests, old-growth forests, restoration and conservation. The Strategy further states that the Commission intends to develop guidelines on biodiversity-friendly afforestation and reforestation and closer-to-nature-forestry practices.

As mentioned above, within the Union, there are huge differences in forest types and ownership, as well as in Member State forest policies. It therefore comes without saying that common European definitions will not work. In addition, concerning forestry practices, these are defined by Member State legislation. In case the Commission feels a need to create larger coherence between Member State practices, such discussions should be referred to the Standing Forestry Committee, as it is a consultation forum providing Member States' expertise to the Commission on forest-related initiatives in the framework of various EU policies, such as those on rural development and the environment.

Concerning the terms “primary forest” and “old-growth forest”, SFIF notes that several definitions exist, such as CBD, UN and IUCN. These definitions are however overlapping, and it is obvious that there is no one-size-fits-all for European forests. If these terms are to be applied, their interpretation must be managed by Member States or even on a regional level, otherwise the huge European forest variety cannot be respected.

The Strategy misunderstands the role of older forests in several ways. Older forests absorb significantly less carbon dioxide than younger forests<sup>2</sup>. In addition, the carbon balance can be *negative* if the older forests are felled by storms, affected by insect infections or by fires, which is now the case in large parts of Europe. If you refrain from felling older, managed forests, you also lose substitution effects. These effects are in principle momentary, through decreased fossil emissions.

Due to the complexity and diversity of European forests, it is important that forestry practices are locally adapted. For example, the Strategy assumes that “closer-to-nature forestry” is a kind of universal method that solves all problems. This is, of course, a truth with great modification. A large part of the boreal forest in the north, especially pine forests, is naturally adapted to recurring disturbances such as forest fires. Closer-to-nature forestry must mimic such disturbance in these forests, which has also been an important starting point for locally adapted SFM, largely without fire. Such examples of closer-to-nature forestry should be further acknowledged, as they combine utility of the forest resource, while maintaining biodiversity and combatting climate effects. Instead of pushing for uniform management methods, the EU should encourage measures adapted to regional conditions.

Based on the above, SFIF encourages the European Parliament and the Member States to:

- Refer any work on definitions, concepts of importance for objectives to be met and guidelines to Member States.

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<sup>2</sup> Luyssaert, S. *et al.* Old-growth forests as global carbon sinks. *Nature* **455**, 213–215 (2008).  
<https://doi.org/10.1038/nature07276>

## The post-2020 EU Forest Strategy must be stand-alone

The Strategy defines that the Commission will propose a dedicated EU Forest Strategy in 2021 in line with the Union's wider biodiversity and climate neutrality ambitions.

SFIF fully supports a revision of the EU Forest Strategy, since the policy landscape has changed dramatically since the last revision in 2013. Today, a growing number of EU policies making increasing demands on forests and forest-based products. To exemplify, climate change mitigation and adaptation as well as sustainability have much larger emphasize in today's political landscape than it had almost a decade ago. Furthermore, the understanding has increased exponentially of the urgency to transition from a linear, fossil-based economy to a circular bio-based ditto. The need to coordinate sectorial policies is therefore large and growing.

While the Treaty of the Functioning of the EU makes no reference or specific provisions for an EU forest policy and since there is no common EU forest policy, the right tool for coordination is a revised Forest Strategy. The Strategy must fill the important role of achieving a holistic and multifunctional perspective, while at the same time respect Member State subsidiarity. For the revised EU Forest Strategy to be relevant, the perspective applied needs to encompass forests and the entire forest-based value chains.

SFIF emphasizes that the revised EU Forest Strategy should be a stand-alone policy and we interpret that this is what the Commission aims for when stating that the strategy is to be in line with strategies on biodiversity and climate neutrality.

Based on the above, SFIF encourages the European Parliament and the Member States to:

- Secure that the revised EU Forest Strategy is a stand-alone policy and not subordinated any other EU policy in areas relating to for instance climate, biodiversity or circular economy