

EU Nature Restoration Targets- Roadmap for Inception Impact Assessment

Background

The roadmap for an Inception Impact Assessment for EU Nature Restoration Targets derives from the EU Biodiversity Strategy for 2030. The roadmap describes objectives and policy options to restore degraded ecosystems, in particular those with the most potential to capture and store carbon and to prevent and reduce the impact of natural and man-made disasters. In a baseline scenario, a number of non-binding measures would be put into place to support restoration activities. Building on that baseline scenario, policy options regarding legally binding targets for restoration are to be considered. Legally binding targets could either build on legislation already in place, or targets could address ecosystems not covered by existing legislation. The roadmap presents a list of aspects for the upcoming policy analysis.

Our views

Swedish Forest Industry Federation, SFIF, welcomes a discussion of the need for nature restoration but we think that even more focus would be on nature conservation management activities. By more effective conservation management in protected areas, securing biodiversity goals, we will at the same time enable an effective and sustainable forest management in other areas, for circular bioeconomy purposes.

Concerning policy options, SFIF strongly supports to start with non-binding measures to support restoration activities. It is noted that earlier targets on restoration are not met, but the reason for this is not presented. In our view, voluntary, realistic and concrete targets combined with guidance, and financing support, gives more incentive to private landowners to carry out activities than legally binding targets do. The option analysis for a legally binding target should therefore clearly investigate the reasons why not a bigger proportion have been restored and also learn from Member States with a better achievement, before developing further legislation. Given the right incentives, legally binding targets might not be needed.

Regarding both non-binding measures as well as legally binding targets for restoration, 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 roadmap raises a number of questions, 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?

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. Sustainable Forest Management, 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.

The potential to capture and store carbon dioxide is stated in the roadmap as a decisive objective to restore degraded ecosystems. In this context, SFIF wants to underline that promoting increased growth of forests through sustainable forest management is superior to all other alternatives to combat climate change, including restoration. In other words, the Impact Assessment should include growth promoting efforts as an essential and even more important complement to restoration objectives. Furthermore, SFIF reminds that forest production and protection objectives can be met simultaneously and are not in contradiction. The aim to ensure the sustainable use of ecosystems, and to improve knowledge and monitoring will thereby be important parts of the roadmap. It is crucial that the restored areas, which are not already under any protection instrument, will be continuously managed for different production purposes.

Regarding the objective to restore degraded ecosystems with the most potential to capture and store carbon, primary and old-growth forests are pointed out. In this context, SFIF wishes to stress that science-based widely accepted definitions of these two concepts still is lacking. It would therefore not be appropriate to include the concepts in any suggestions for objectives. Furthermore, in relation to capturing and storing carbon, it must be reinforced that old trees does not capture carbon as well as younger forests. Instead, the most effective way to mitigate climate change is to increase forest growth and to use the biomass to produce wood-based products which can substitute fossil-based materials and energy.

SFIF further wants to highlight that any EU restoration policy development must be based on a deep understanding that we have a great variety of forests in 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. Acknowledge Member State lead on work related to conservation and protection of habitats and species.

About the Swedish forest industries

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, we have a much experience of restoration of degraded forest ecosystems, as big parts of southern Sweden were deforested in the beginning of the 20th century but are now and since nearly 100 years covered by forest. Focus has been on reforestation and silviculture, resulting in a successful doubling of the Swedish forest stock from the early 1900's until today. 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.

Today more than five percent of Sweden's forests, about 1,2 million hectares, are exempted from production forestry on voluntary basis and managed to preserve and promote biodiversity under forest certification schemes or otherwise. These areas and forest ecosystems are not degraded, but biodiversity in some of them would benefit of more active management activities to be preserved and developed.