



BRIEFING PAPER

EU FOREST STRATEGY • APRIL 2021



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HOW THE FOREST STRATEGY CAN HELP THE EU REACH ITS GREEN DEAL COMMITMENTS

Despite their obvious and prominent role as a shelter for biodiversity and their contribution to climate mitigation and the well-being of EU citizens, EU forests are still under threat and are exposed to multiple and growing pressures. Over the last few centuries, forests managed to varying degrees of intensity have replaced almost all of Europe's natural forests.

Currently, **less than a third** of Europe's forests are uneven-aged, 30% have only one tree species (mainly conifers), 51% have only two to three tree species, and only 5% of forests have six or more tree species. Moreover, **less than 15% of EU forest habitats** protected under the EU nature directives have a favourable conservation status, jeopardising their resilience to the future projected and unforeseen effects of climate change.

The previous EU forest strategy has clearly not lived up to the challenges forests are facing and was particularly weak with regards to implementation. The current momentum around biodiversity and forests must now turn into concrete and ambitious actions on the ground to avoid losing another decade and to reverse the current trend.

It is time to rethink our approach to forests and their numerous values and recognise the detrimental effects of activities and policies leading to their degradation.

TO BE EFFECTIVE, THE EU FOREST STRATEGY MUST:

- **Build on the Green Deal and be consistent with the EU's international commitments**
- **Secure the health and resilience of Europe's forests by:**
 - Reforming the rules of bioenergy in the Renewable Energy Directive
 - Supporting the implementation of the protected area targets of the EU Biodiversity Strategy for 2030
 - Supporting the implementation of the legally binding restoration targets for forests
 - Ensuring multi-functional forest management and integrating biodiversity as a core principle
- **Adopt strong governance mechanisms**, with a robust, EU-wide monitoring framework



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BUILD ON THE GREEN DEAL AND BE CONSISTENT WITH THE EU'S INTERNATIONAL COMMITMENTS

A common results-oriented and cross-boundary forest strategy is needed to foster stronger coordination between national forest policies, the Biodiversity Strategy for 2030 and the objectives of the European Green Deal.

The climate and biodiversity crises demand dedicated and collaborative efforts across Europe. The EU policies and competences related to forests – including those on climate, environment, rural development and agriculture – need to be integrated.

We believe that ambitious objectives can be met by putting in place a coherent and cross-cutting strategy, supported by a strong governance framework to monitor its implementation. This is why the EU forest strategy must recognise the prominent role forests can play in tackling the biodiversity and climate crises.

Ensuring consistency with the EU's international commitments is paramount as well. This includes reference to the measures in the [Communication on Stepping up EU Action to Protect and Restore the World's Forests](#) and, especially, the support to their implementation.

The EU Biodiversity Strategy for 2030 and the [Farm to Fork Strategy](#) have affirmed the European Commission's commitment to present in 2021 a legislative proposal to avoid or minimise the placement of products associated with deforestation or forest degradation on the EU market. This commitment was reaffirmed by the President of the European Commission, Ursula von der Leyen, [at the One Planet Summit](#) in January 2021. Therefore, the EU forest strategy should support a proposal for a new, strong and effective legislation. WWF has [made clear demands](#) for such an ambitious EU regulation.

REFORM THE RULES ON BIOENERGY IN THE RENEWABLE ENERGY DIRECTIVE

The threat posed by EU bioenergy policies to the world's forests and climate was highlighted in 2018 by nearly 800 scientists, including multiple IPCC lead authors and recipients of the US Medal of Science and the Nobel Prize, but their warnings were ignored and emissions from biomass burning in the EU [continue to rise](#).

HOW DO FORESTS HELP TACKLE CLIMATE AND BIODIVERSITY CRISES?

Forests are at the very core of the climate policy for mitigation and adaptation. They have a crucial and prominent role to play in reaching [the 2050 carbon neutrality target](#) by increasing resilient carbon stocks in the forest

[The strict protection of forests ecosystems](#) (including all remaining primary and old-growth forests), effective management of protected areas, biodiversity-oriented restoration, and closer-to-nature forest management will lead to a greater and more resilient increase of the EU carbon stocks, and should be considered as priority solutions to achieve the targets of both the Green Deal and the Biodiversity Strategy.

In contrast there is [no good evidence](#) that harvesting forests for timber delivers any climate benefit, even when that replaces carbon intensive materials such as concrete and steel.

The European Commission's assumption that greater use of wood products must be incentivised is, therefore, very alarming and must be reconsidered.



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At the moment, the revised Renewable Energy Directive (RED) does not contain any restrictions on what types of forest biomass can be counted towards targets and, therefore, subsidised or subjected to other incentives.

On the contrary, EU rules assume that all biomass should be counted as carbon neutral at the point of combustion and considered fully renewable, creating powerful incentives to burn more wood even where that will typically increase emissions for decades or even centuries compared to fossil fuels.

WWF and other NGOs recently [wrote](#) to the Executive Vice-President Frans Timmermans and others highlighting the damage caused by the EU incentives for bioenergy – in the EU and elsewhere – and the need for urgent changes to the rules to bring them in line with the European Green Deal.

Specifically, unless – and until – the EU seriously reforms its bioenergy policies (by distinguishing in the EU Renewable Energy Directive between different feedstocks), they will continue to undermine our climate and biodiversity objectives and hence our contribution to the UN Sustainable Development Goals. They will also further undermine the cascading use principle and cause serious harm to the EU's international reputation for environmental leadership.

SUPPORT THE IMPLEMENTATION OF THE PROTECTED AREA TARGETS OF THE EU BIODIVERSITY STRATEGY FOR 2030

The EU Biodiversity Strategy for 2030 contains ambitious commitments for stronger nature protection and commits to more effective implementation of conservation in existing protected areas and to extend the protected area network (see box on the right).

As mentioned in the roadmap on the EU forest strategy, securing the health and resilience of existing and new forests is crucial for ensuring they can provide all of their environmental, social and economic functions.

BURNING WOOD FOR ENERGY PROVIDES NO CLIMATE BENEFIT

A recent [analysis](#) by the Joint Research Centre (JRC) found that most of the wood currently being burnt for energy in the EU was 'primary woody biomass' (defined in the EU Renewable Energy Directive as 'forest biomass') rather than 'secondary woody biomass' (such as forest-based industry by-products and recovered postconsumer wood). The analysis concluded that such primary woody biomass would provide no climate benefit compared to fossil fuels within 10 years and that, compared to fossil fuels, the majority of it would increase emissions compared for decades.

The same report highlighted that there are alarming gaps in the data on forest biomass use, with a growing discrepancy between recorded sources and end uses that in 2015 reached 117.8 million cubic metres, and that most of the latest National Energy and Climate Plans (NECP) do not include an adequate assessment of the potential impacts of expanding forest bioenergy on carbon sinks, biodiversity, water, and air pollution. Specifically, they often lack details on how the projected levels of biomass will be supplied.

KEY COMMITMENTS OF THE EU BIODIVERSITY STRATEGY TO 2030:

1. Legally protect a minimum of 30% of the EU's land area and 30% of the EU's sea area and integrate ecological corridors, as part of a true Trans-European Nature Network.
2. Strictly protect at least a third of the EU's protected areas, including all remaining EU primary and old-growth forests.
3. Effectively manage all protected areas, defining clear conservation objectives and measures, and monitoring them appropriately.



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The EU forest strategy must, therefore, integrate the protected area targets for forest ecosystems. WWF has published a [joint policy paper](#) with recommendations on how to turn the protected area commitments of the EU Biodiversity Strategy into action. As an urgent priority, management effectiveness and actual protection of all existing and new protected areas must be improved. An ecologically coherent and representative network of protected areas, including forests, should be created.

WWF strongly supports the target to strictly protect all remaining primary and old-growth forests in Europe. The definition of old-growth and primary forests should be based on science, the diversity of realities in each country, and clear ground-based definitions. Satellite images and remote sensing, in combination with field visits to confirm the findings, should be used to inventory the potential location of old-growth forests that need protecting or restoring. The results of the mapping at EU scale should be made publicly available.

However, it will not be sufficient to strictly protect only the remaining small patches of those valuable forests: a landscape approach is needed to better connect them and allow key functional processes of such a network.

This means that other forests – those not complying today with the definition of primary or old-growth forests, for instance in buffer zones or regions where they are less represented for historical reasons – will need to be strictly protected to restore their ecological qualities (e.g., age, structure, diversity). This will also be necessary to achieve the goal of strictly protecting 10% of the EU's land and for forest restoration (see below), meaning that those forests would be excluded from logging and other extractive activities and allowed to mature to become old-growth forests.

SUPPORT THE IMPLEMENTATION OF THE LEGALLY BINDING RESTORATION TARGETS FOR FORESTS

By the end of 2021, the European Commission will propose legally binding EU nature restoration targets. The new restoration law must:

- Be targeted and result in urgent large-scale restoration efforts across the EU.

The definition of old-growth and primary forests should be based on science, the diversity of realities in each country, and clear ground-based definitions.



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- Complement the relevant EU Directives and create synergies between the biodiversity and climate crisis agendas. The implementation of these targets, insofar as forest ecosystems are concerned, needs to be clearly integrated into the EU forest strategy.
- Contribute to halting and reversing biodiversity loss, resulting in the restoration of natural forest habitats, supporting forest-dwelling species and ecosystem functioning, as well as connectivity between habitats, thus improving resilience at landscape level and across the EU to contribute to climate change mitigation and adaptation.

ENSURE MULTI-FUNCTIONAL FOREST MANAGEMENT AND INTEGRATE BIODIVERSITY AS A CORE PRINCIPLE

Although forest lands and trees are subject to property laws and are administered under different ownership regimes, they are in many ways a common good providing free (or not appropriately recognised and rewarded) ecosystem services, for which owners or managers hold a duty and responsibility towards society (e.g. carbon storage, water protection, biodiversity).

At present, the composition, structure and productivity of future forest ecosystems cannot be foreseen, but the evolution of forests' functions (including resilience), and the very existence of forests ecosystems in certain regions, will be even greater if forests shelter biodiversity in a well-preserved state. In the longer run, but likely shortly after 2050, climate change will strongly modify the ecological aspects of forests and their associated biodiversity or ecosystem services.

This is why the EU forest strategy needs to clearly state that the priority of forest management should be to strengthen forest resilience by modifying management rules and practices. We should move towards closer-to-nature-oriented forest management practices, make biodiversity the baseline principle of the work of the 21st-century foresters and recognise and promote the numerous environmental and socio-economic services that forests provide (see sidebar on the following page).

Destructive practices (extraction of stumps, intensive soil preparation before planting, or planting exotic and invasive tree species) and forest activities that manipulate natural conditions, threaten biodiversity and

LEGALLY BINDING RESTORATION TARGETS

WWF is advocating for legally binding restoration targets of 15% of the land and sea area to be restored – at EU and at Member State level. Both active restoration – restoring conventionally managed forests to natural forests containing sufficient deadwood and structure to ensure ecological quality – and passive restoration – stopping logging and allowing forests mature to recover old-growth – should be encouraged.

Restoration should also include restoring biodiversity that depends on human extensive practises, e.g. grazed forests or the re-naturalisation of old plantations.

Monoculture plantations of non-native tree species will not provide the large and resilient carbon stores needed for climate mitigation efforts. They will also harm biodiversity – and must not be encouraged under any EU rules.

The restoration measures should lead to a permanent change aiming to restore high quality and resilient forests. They must also result in significant management change and should not discriminate between restoration activities inside or outside already protected areas.

The restoration law should require Member States to draft science-based national restoration plans, which would be assessed and approved by the Commission to ensure their quality and consistency.



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risk polluting watercourses and undermining resilience. Given that foreseen natural disturbances will be increasing, these practices and activities must be strictly avoided.

In a context where the [harvesting pressure has been increasing in Europe since 2015](#), “commercial forestry” as carried out in many places across the EU, relying extensively on (mono-specific) plantations and clear cuts, presents a considerable impact on biodiversity and climate change. It should be strictly regulated (forbid the use of pesticides in forests and large scale clear-cuts, besides sanitary cuts) and replaced by closer-to-nature forest management practices.

Forests should also be better integrated into spatial planning, as a solution towards inclusive and [sustainable economic growth](#) and land pressure should be better controlled. Given the time scale of forest ecosystems’ responses, investing in this new management approach and in ecosystem services must happen now, so that these services will be fully available during the second half of the 21st century.

ADOPT STRONG GOVERNANCE MECHANISMS, WITH A ROBUST, EU-WIDE MONITORING FRAMEWORK

The European Commission should be formally assigned to follow closely the development of the implementation of the EU forest strategy and provide guidance on the interpretation and application of its main elements.

The Commission should check regularly whether actions undertaken by Member States are aligned with the aims and objectives of the strategy. The targets and commitments of the EU forest strategy must be clear, measurable and lead to timely improvements for each of the objectives set.

A robust and EU-wide review framework should be established, to aggregate information at the national level in order to track the implementation, measure the achievements of the EU Forest Strategy and its contribution to reaching the EU biodiversity and climate targets.

EU Member States should report on their actions and progress on a bi-annual basis by detailing actions undertaken, results and progress observed to date, and foreseen actions. The Commission and EU

HOW TO REWARD FOREST OWNERS FOR THE BENEFITS PROVIDED BY FORESTS

Environmental and socio-economic services that lack market today will increasingly be assigned a value due to a shift in society and because of climate change – these include more specifically services linked to water resources and carbon sequestration. We are also increasingly becoming aware of the important role of supporting and regulating ecosystem services provided by biodiversity.

Payment for Ecosystem Services (PES) schemes are potential sources of sustainable financing for conservation and can contribute to rural areas economics and rural lifestyles.

Proper PES schemes should be introduced, and forest owners should be rewarded for the multiple actions (or non-action) they implement to provide, protect or restore ecosystem services (including supporting, regulating and cultural services) provided by their forests.

However, PES schemes should be based on stringent principles and insofar as climate is concerned must not involve the market-based trading of carbon offset certificates. Carbon dioxide removal in the land use sector is not measurable, reliable or permanent and cannot simply be treated as directly equivalent – tonne for tonne – to fossil fuels emissions. To do so would constitute little more than EU-sanctioned greenwashing.



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Member States should establish greater transparency towards the public and stakeholders and plan information sessions for them.

Information about EU forests is often contradictory, lacking a common denominator, resulting in missing and inconsistent information. The availability of spatial analyses and the integration of remote-sensing data with forest inventories and other field assessments should be improved.

Mapping and monitoring of forest biodiversity, ecosystems functions, and services must be improved at EU and local level, through a single shared and harmonised monitoring system and should inform decision-making and help to achieve representative, ecologically coherent, and functional protected area networks intertwined with forest areas that are managed sustainably.

The concerns and expectations from civil society towards forests are changing. Deep concerns have arisen and some management practices are no longer supported by civil society (such as clear cuts). Recent petitions on the role of the EU on [deforestation worldwide](#), the [disastrous consequences](#) of subsidies for forest biomass under the Renewable Energy Directive or the [massive protests](#) in [Poland](#) and [Romania](#) have shown citizens' desire to see the EU forests well protected and managed, and how far they are ready to commit to seeing decision-makers behaving ethically towards nature. The COVID-19 pandemic reminds us that the health and [well-being of EU citizens](#) are closely linked to nature and forests.

Because of a lack of dialogue between foresters and society, conflicts over forest management are frequent. It is therefore mandatory to share a clear and transparent social contract between foresters and citizens, address concerns from society on the future of forests, including concerns from foresters themselves, in order to face all together the climate crisis to come and its numerous impacts.

It is time to implement a strong and inclusive governance framework engaging all relevant parties in environmental decision-making, a [legal duty since the Aarhus convention](#)

For more information:

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