

Response to the public consultation on the EU Forest Strategy Roadmap

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The European Environmental Bureau, Europe's largest network of environmental citizens' organisations, welcomes the upcoming EU Forest Strategy with its objectives of forest preservation, restoration and biodiversity friendly afforestation. Based on the Treaties and as clarified by the Court of Justice of the European Union, the European Commission should use its powers to adopt an EU Forest Strategy that builds upon and directly contributes to the implementation of the EU's Biodiversity Strategy for 2030 and the wider European Green Deal ambition. The targets and commitments of the strategy must be clear, measurable and lead to timely improvements given the urgency of the climate and biodiversity crisis.

The protection and restoration of forests should be the key objectives of the Strategy, recognising the important role forests can play in tackling the biodiversity and climate crisis. In addition, the management of existing protected areas must be improved to bring biodiversity back to forests across the EU. The implementation and enforcement of existing obligations, such as the Birds and Habitats Directives, must be stepped up significantly, including by allocating more capacity and resources to protect key habitats and species as well as the rule of law.

Several commitments of the EU Biodiversity Strategy for 2030 relate to forests and it is therefore crucial that the Forest Strategy provides for the achievement of these commitments to ensure that forests play their much-needed role in tackling the interlinked biodiversity and climate crisis.

It is important that ecological factors are at the core of the work to define, map and monitor existing primary and old-growth forests for their strict protection. The criteria for strict protection should be aligned with the IUCN categories I and II and should focus primarily on non-intervention management and the protection of large-scale natural processes, excluding all extractive and habitat-altering activities, including logging.

Any tree planting must ensure the full respect of ecological principles to avoid the wrong trees being planted in the wrong places and to prevent monocultural plantations. Tree planting holds particular potential for urban and peri-urban areas, providing also climate adaptation and wellbeing benefits. In addition, it must be ensured that these additional trees are not subject to logging in the near future so that they do provide the foreseen long-term biodiversity and climate benefits.

It is essential that the growing interest in using forests as carbon sinks does not lead to monoculture plantations that will then be logged for commercial purposes or to the afforestation of healthy, biodiverse and carbon-storing ecosystems such as grasslands or wetlands. Instead, existing old-growth, primary and biodiverse forests must be protected, others must be left to mature to old-growth and diverse forests, while the management of all forests must be improved to focus on the long-term sustainability and ecological resilience thereof. In addition, other ecosystems, such as peatlands that store significant amounts of carbon, must also be protected and restored. The Forest Strategy should support and enable synergies with the

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upcoming legal instrument on the restoration of ecosystems important for biodiversity and climate. Restoration and conservation activities also provide broader social and economic benefits, including through the creation of sustainable jobs, significant investment returns through *inter alia* health, wellbeing and recreation benefits, while being crucial cost-effective solutions to the climate and biodiversity crisis.

The Common Agricultural Policy (CAP) should be a key tool to fund the shift to more sustainable practices. This requires a fundamental reform of the CAP to ensure that it is aligned with the European Green Deal, the Biodiversity and Farm to Fork Strategies instead of undermining the much-needed ambition.

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