



Protect the Forest's comment on Amendment of the Land Use, Land Use Change and Forestry Regulation (EU) 2018/841

By decreasing harvest rates and protecting older natural forests, carbon will continue to be absorbed and stored in the soil. Emissions from forest harvesting are not fully accounted by the LULUCF Regulation. Instead, harvested wood products (HWP), which include paper products and wood used for energy, are considered as CO₂ removals. According to a study ([Harmon, 2019](#)), the projected long-term mitigation benefits related to product substitution by wood may have been overestimated 2- to 100-fold. Most of the produced forest products, such as paper and bioenergy, are short-lived. Only a small fraction ends up in long-lived products such as timber.

Bioenergy is not carbon-neutral. The burning of bioenergy emits carbon dioxide immediately which contributes to the greenhouse effect just like fossil fuels. It takes many years to compensate for these carbon emissions: in a 50-100 year perspective, bioenergy can even have larger climate impact than fossil fuels. More than 100% of Europe's annual harvest of wood would be needed to supply just 1/3 of the expanded Renewable Energy Directive (RED). Everything possible should be done to prevent carbon dioxide from entering the atmosphere. The purported climate benefits of bioenergy need to be re-evaluated urgently and the use of both bioenergy and fossil fuels must be reduced. Forest biomass should be taken out of the RED.

Replacing natural forests with plantations and HWP to create sinks is not positive for mitigating climate change as it fails to account for the carbon lost from the destroyed natural forest and when wood is used for energy. The older the forest is, the more carbon it contains, both in the soil and trees. Old-growth boreal forests aged up to 800-5000 years can still continue to function as carbon sinks and do generally contain more below-ground carbon than younger forests.

New forest reference levels should be set, as the current baseline defines ongoing forest harvesting as having no climate impact. This must be done as soon as possible, by an independent scientific body, and could be based on a projection of a desired target for 2050 with an increase of valuable natural forests that sequester carbon and have large carbon stocks.

Trading of land sector carbon credits should not be expanded and the current allowable limit should be set to zero.

LULUCF Regulation should explicitly acknowledge and counter the loss of biodiversity. The EU Council recently endorsed the protection and restoration goals of the Biodiversity Strategy. Related policies must be compatible and the LULUCF Regulation requires a major revision. All taken measures should be strictly compliant with the goals of the Biodiversity Strategy.

Make sure to specify definitions and clear terms for so called 'sustainable' forestry practices, which consider the socio-ecological economics and policies that operate within the planetary boundaries for biodiversity. Today, arbitrary and vague definitions of the word 'sustainable' promote clear-cutting practices and increased expansion of tree plantations, which harm the biodiversity and offset greenhouse gases. The term 'sustainable' should not mislead or be able to misinterpret.

Protect the Forest agrees that the costs related to carbon sequestration and enhancement of biodiversity are not sufficiently rewarded and that environmental costs of land-related activities are not priced. Make sure to incentivise forest protection and restoration measures. Favor natural regeneration and natural forests, not monoculture plantations.

Support the use of nature-oriented and continuous cover forestry in forest areas without high conservation values in order to cause less detrimental effects on biodiversity and ecosystem services, and to minimize the release of greenhouse gases.

Introduce a tax on forest products based on their ecological footprint, which should include greenhouse gas emissions from land-use change, according to the Polluter Pays Principle. Introduce incentives to reduce the consumption of paper and forest products. Promote recycling.

--

References

- Beddington, J. et al (2018-01-09). *Letter from scientists to the EU Parliament regarding forest biomass*; http://www.pfpi.net/wp-content/uploads/2018/04/UPDATE-800-signatures_Scientist-Letter-on-EU-Forest-Biomass.pdf
- Berg, B. et al. (2001). *Humus buildup in boreal forests: effects of litter fall and its N concentration*. Canadian Journal of Forest Research 31(6): 988-998; https://www.researchgate.net/publication/237865785_Humus_buildup_in_boreal_forests_effects_of_litter_fall_and_its_N_concentration
- EASAC (2017). *Multi-functionality and sustainability in the European Union's forests*. EASAC policy report 32; http://www.easac.eu/fileadmin/PDF_s/reports_statements/Forests/EASAC_Forests_web_complete.pdf
- Harmon (2019). *Have product substitution carbon benefits been overestimated? A sensitivity analysis of key assumptions*; <https://iopscience.iop.org/article/10.1088/1748-9326/ab1e95>
- Holtmark, B. (2015). *Quantifying the global warming potential of CO2 emissions from wood fuels*. GCB Bioenergy 7 (2), 195-206; <https://onlinelibrary.wiley.com/doi/pdf/10.1111/gcbb.12110>
- Johnston, C. M. T. & van Kooten, G. C. (2015). *Back to the past: Burning wood to save the globe*. Ecological Economics 120, 185-193; <https://www.sciencedirect.com/science/article/abs/pii/S0921800915004164>
- Luyssaert, S. et al. (2008). *Old-growth forests as global carbon sinks*. Nature 455, 213-215; <https://www.nature.com/articles/nature07276>
- Mackey, B. et al. (2013). *Untangling the confusion around land carbon science and climate change mitigation policy*. Nature Climate Change 3, 552-557; <https://www.nature.com/articles/nclimate1804>
- Moomow, W. R. et al. (2019). *Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good*. Front. For. Glob. Change, 11 June 2019 <https://www.frontiersin.org/articles/10.3389/ffgc.2019.00027/full>
- Nassen, J., Hedenus, F., Karlsson, S. & Holmberg, J. (2011). *Concrete vs. wood in buildings - An energy system approach*. Building and Environment 51, 361-369; <https://www.sciencedirect.com/science/article/abs/pii/S0360132311003957>
- Naudts, K. et al. (2016). *Europe's forest management did not mitigate climate warming*. Science 351, 597-600; <https://science.sciencemag.org/content/351/6273/597>
- Ter-Mikaelian, M. T., Colombo, S. J. & Chen, J. (2015). *The Burning Question: Does Forest Bioenergy Reduce Carbon Emissions? A Review of Common Misconceptions about Forest Carbon Accounting*. Journal of Forestry 113 (1), 57-68; https://www.researchgate.net/publication/271224456_The_Burning_Question_Does_Forest_Bioenergy_Reduce_Carbon_Emissions_A_Review_of_Common_Misconceptions_about_Forest_Carbon_Accounting
- Wardle, D. A. et al. (2012). *Linking vegetation change, carbon sequestration and biodiversity: insights from island ecosystems in a long-term natural experiment*. Journal of Ecology 100, 16-30; <https://besjournals.onlinelibrary.wiley.com/doi/full/10.1111/j.1365-2745.2011.01907.x>