



European Federation of Municipal Forest Owners
Fédération européenne des communes propriétaires de forêt
Europäische Vereinigung gemeindlicher Waldbesitzerververtretungen

STATEMENT on the inclusion of greenhouse gas emissions and removals from land use, land use change and forestry into the 2030 climate and energy framework [COM (2016) 479 final]

We, representatives of European Forest Municipalities, having high concern and responsibilities regarding the implementation of climate and energy policies on the ground, welcome the Commission proposal for a regulation on the inclusion of greenhouse gas emissions and removals from land use, land use change and forestry into the 2030 climate and energy framework [COM (2016) 479 final].

We acknowledge the proposal is an important step, in line with the Paris agreement, to achieve the 2030 climate and energy policy's targets, thus contributing to improve resilience to climate changes and keeping the global temperature increase under 2°C the preindustrial level.

We recognize several positive points of the proposal, with the inclusion of LULUCF, as a separate pillar, into the 2030 climate and energy framework, the integration of harvested wood products, options for the exclusion of emissions from natural disturbances.

However, we consider the proposal should be improved on 3 major points:

- **The proposal should more promote proactive and sustainable forest management practises** thanks to forest management plan or their equivalent, enforced by public authorities from local to national level. It is indeed proven that old forests (forest lands of long existence) sustainably managed are more resilient to natural disturbances. Therefore, probability that old forests act as stabile carbon sinks on long-term is higher than those for young forests and afforested lands.
- **It would be relevant to consider the whole impact of the forest sector on low carbon economy by adjusting accounting rules of Forest Reference Level (FRL) for managed forest lands:**
The inclusion of LULUCF into the 2030 climate and energy framework is part of the Energy Union political framework, together with other pillars, such as the bio-economy strategy aiming at fostering transition to low carbon economy. Forest based-sector can contribute by many complementary ways to this political framework:
 - with sustainable managed forests acting as carbon sinks;
 - with forest biomass substituting fossil energy;
 - with stored carbon in wood used as energy efficient and renewable material for construction.Thus, additionally to existing accounting rules based on a projection of forest management practices from the period 2000 to 2009, it would be coherent to include future policies related data from forest based bio-economy. Moreover, it would be fair to review these data in the foreseen 5-year reports to the Commission, according to the results achieved by the forest-based bio-economy policies included into the FRL.
- **The proposal should not give the right to the Commission to recalculate the FRL** through delegate acts, considering the subsidiary principle and the fact that forest policy is under Member States competence. However, it would be better the Commission play a coordinating role to ensure, under a common accounting method, transparency, reliability, and communication of data reported by each Member States.

APPROVED by the FECOF board on 22 March 2017