

Sustainable forest management is vital to ensure that Europe meets its climate and energy goals. But over-regulating forest bioenergy would damage the sector's economic performance and undermine its potential for climate change mitigation, Emma Berglund told EURACTIV in an interview.

Emma Berglund is the secretary general of the Confederation of European Forest Owners. She spoke to EURACTIV's Samuel White.

Trees are more or less Europe's only active carbon capture and storage system. What is their full potential for climate change mitigation and how can this be maximised through good forest management?

When we talk about forests in climate change mitigation and adaptation, we need to understand the full picture. The best long-term strategy to maximise their potential is to have a sustainable and active forest management strategy. So we can adapt the forest and make it more resilient and ensure it is healthy and vital.

At the same time, we can also keep the forest growing by harvesting the old trees and replacing them with faster-growing new trees that sequester more carbon. And then we can use these trees in long-lived products, like house building materials that store carbon for a long time, but also in products that replace more energy intensive or fossil-based products. We usually talk about the three S's: sequestration, storage and substitution. When the trees are growing they sequester carbon, and this can be stored in standing forests or in wood products, and then wood can also be a substitute for fossil fuels. The problem with fossil fuels is that burning them releases new 'black' carbon into the atmosphere.

Forest ecosystems work in a green carbon cycle, and sustainable forest management is crucial in maintaining and enhancing this carbon cycle, as well as replacing fossil fuels. The European Parliament recently adopted sustainability criteria for forest biomass under the Renewable Energy Directive. Do you think these are helpful towards the EU's decarbonisation goals or do you feel they will hold forestry back, that it has the potential to go further?

Generally, our worry is that it could hold the potential of forestry back. We fear it may add burdens and restrictions that would make it harder for forest owners to manage their forests and mobilise wood. And I think the debate around bioenergy is a very contagious issue that tends to be seen in black and white. But we do not see bioenergy demand as a threat to our forests.

We sometimes hear that higher bioenergy targets will mean we will cut down and destroy all our forests, but this is not at all how we see things in reality. Bioenergy does not drive the decisions of forest owners to harvest their trees; it is the high-value products that bring

the biggest income and energy is just a side product. It helps to support the overall economic sustainability of the forest owners' operations but it is a relatively small factor. The risk is that if we introduce new criteria for this side product, it could potentially place a big burden and a lot of restrictions on forest owners, which will undermine their main activity. Because they don't manage a tree differently depending on where the wood ends up.

In what way are the criteria too complex?

They should remain simple and operational. There were five criteria, two of which were not covered by the Commission's impact assessment, and the Parliament has added a sixth.

Throughout the debate in Parliament, we have also seen attempts to introduce the 'cascading' principle into the legislation. This is completely unacceptable to us.

Could you explain what cascading is and why you are opposed to it?

We are not opposed to the principle as such. Cascading is the idea that you should use wood several times even as it decreases in value. It may first be used in a building, then it should be reused several times and only at the very end should it be incinerated for energy. It is a logical concept that is already used to a large extent in the forest sector.

After all, wood is a valuable resource so it makes economic sense to get the most value out of it. But regulating it in legislation would be to dictate the market and tell forest owners where they must sell their wood. This is not a free market and it would have a distorting effect on prices.

So we agree that cascading is a good principle but it is not one that you can regulate for. You have said that forest biomass is a side product of high-quality wood production, but CEPF has recently been pushing for all types of wood, including the high-quality roundwood from tree trunks, to be classified as a sustainable renewable energy source. How can this be justified?

This has been a bit of a communication challenge. We were very much against the proposal to exclude roundwood from the types of wood considered renewable under the Renewable Energy Directive. This is not because we now want to chop down and burn whole trees, it simply depends on where the forest owners are and the kinds of markets they have access to.

Normally I would say that the high-quality timber would always go to a sawmill, it would never go to bioenergy generation, no matter what. But when you get down to lower quality wood, bioenergy can be a valid option if the wood cannot be used by a sawmill, even if it looks like a normal, big tree trunk.

Another issue is smaller dimension trees and whether there should be a size limit for trees

used for bioenergy. If you wanted to exclude roundwood above a certain diameter, you would have to go out into the forest and carefully measure every single tree before cutting it down.

Today it is already barely economically feasible for many forest owners to mobilise wood for bioenergy at all, so if we add further costs and complications they simply will not put it on the market, and then we will have problems meeting our targets.

Moving on to the regulation on land use, land use change and forestry, could you explain your reaction to the Commission's proposed forest reference level and what it means for forest owners?

The forest reference level is supposed to be a projection into the future, which is based on the harvest intensity of the past. The Commission proposed to take 1990 to 2009 as a reference period. There are also many other factors that come into play here but this is a big part of it.

We were very critical about using a past period to calculate a forest reference level for the future. We would prefer to see it based on the real potential of the forests because otherwise, it can be very arbitrary. For countries like Spain, for example, that have harvested very little new growth in the past it may even be beneficial to increase harvest rates to cut the risk of forest fires. So we do not see the benefit of basing this on past activity. And increasing harvest rates is not harmful for the climate as long as we stay within the sustainable harvest levels.

The proposal was adapted during the process and we think it has improved, but it is so complex we still don't really know what the outcome will be. As for its impact on the sector, we will have to wait and see.

What would you see as a sustainable harvest level for new growth?

I don't see this as what LULUCF should be about. Forest management and harvest levels are not even an EU competency. They should be driven by markets and long-term management planning. Depending on the age structure of certain forests the harvest level may fluctuate. We want LULUCF to be purely an accounting framework, although we do fear it may go beyond that.

I would also add that it is not necessarily unsustainable to harvest 100% of new growth. Sometimes this may even be the most sustainable management strategy. It is not common practice but it is not necessarily unsustainable.

Beyond energy generation and timber, are there any other sectors where you think industries could be looking to use more forest products? Is there anything the EU can do to push the forest bioeconomy?

The bioeconomy is an interesting topic and a big opportunity for the forest sector. I see it as an opportunity to reach both climate targets and sustainable development goals, while bringing more value to the EU's rural areas.

Anything you can make from oil you can also make from wood. Technically it is possible. There are loads of opportunities in innovation and research, and the bioeconomy is also a way to reach many different goals at the same time.

Sixty-percent of EU forests are owned privately, mostly by families and small-scale owners, and we should understand how we can motivate these people to actively and sustainably manage their resources to mobilise what society needs in this period of transition. This is why I would stress that we should not burden them with too much legislation.

More broadly, forests are clearly an integral part of rural areas and they can help support economic activity in these areas and make rural areas attractive to live in. It is also important to ensure that the value of the forest bioeconomy is shared with the primary producers to strengthen rural development.

Finally, wood is mankind's oldest fuel and it is currently the biggest form of renewable energy in Europe. Do you think we will still be burning forest biomass later in the century or do you see it as a transition fuel?

Probably, but not as much as we do now. In a sense it is a transition fuel: it is the main source of renewable energy and this will not be the case in the decades to come. Other types of renewable energy will continue to grow and will overtake forest biomass.

We are in a transition phase and we know we need it now to meet our targets. For forest owners, it provides an important side income, and to a certain extent, people in certain regions will always use wood to heat their homes.

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