

Is the EC proposal on integrating the forest sector into the EU 2030 Climate and Energy Framework fit for purpose?

Some personal reflections from a UK perspective

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Principles relevant in a UK context

- Longer-term and shorter-term goals are equally important
- Building a bioeconomy must go hand in hand with promoting forest carbon sinks *and* stocks (reservoirs)
- Effort should be shared fairly, transparently and realistically
- Avoid 'devils' in accounting.

Try to illustrate with 3 UK experiences

- Forest cover in the UK is relatively low
- Currently, creating new forest areas (afforestation) is one of few activities that could capture CO₂ (store carbon)
- But, once you create new forests, you need to keep them, or you lose the carbon ('can't go back' – less flexibility); also socioeconomic constraints
- Benefits accumulate over decades – actions taken now have shorter- and longer-term positive impacts
- Carbon losses from deforestation happen quickly
- To support (new) afforestation activities, the benefits over time need to be recognised and credited
- It is not clear that proposed accounting rules would recognise longer-term benefits (after a fixed period, afforested land changes status to 'existing' forest).

- Very roughly, about one half of the UK forest area was created through afforestation in the last 100 years
- There is a 'bulge' in the age distribution of forest areas
- Many of these forest areas are reaching the peak point of wood production (i.e. felling), presenting opportunities for 'building a bioeconomy'
- There is also a relatively important area of forest regarded as 'under-managed'
- There are aspirations to improve the management of these forest areas for multiple objectives – this is widely (and rightly) viewed as a 'good thing to do'
- If these opportunities and aspirations are to be achieved, then harvesting for wood production would increase in the near term
- But, there can be negative impacts for forest carbon...

- 'Building a bioeconomy' will involve increased use (harvesting) of (forest) biomass ('mobilising the wood resource'), i.e. more active forest management
- This will lead to more carbon being removed from forests each year (as harvested wood)
- But, more active forest management can also lead to more vigorous forest growth and increased forest sinks
- The increased harvesting of biomass and the increased forest sinks can balance one another
- But, more active forest management would also involve making forest areas younger ('more vital')
- Younger forest stands contain less carbon than older forest stands ...
- While you are making the transition, you lose carbon

- This raises the question: Would the proposal support or hinder building a bioeconomy in ways that would achieve net GHG emissions reductions, avoiding risks of actually increasing GHG emissions in the short(er)-term?
- The answer is not clear
- The relevant accounting rules appear to be slightly different to currently, potentially in important ways
- It may still come down to how the accounting rules are interpreted (by different Parties)
- Perhaps it is not the job of the proposal to address this question?
- If so, what is needed to address the question?
- Does the answer need to come from the EU or from Member States?

- 'Bioenergy' is (rightly) viewed as a (potentially) renewable energy source
- (Forest) bioenergy use has increased in the UK
- Much of the forest biomass consumed in the UK is imported from outside the UK and outside the EU
- If there are GHG emissions arising from biomass use (see previously), how should these be distributed (producer, consumer, shared...)?
- This also applies to other harvested wood products
- Effectively, the proposal continues to handle this in the same way as currently (accounted for by producer)
- It is not clear if this will support or hinder co-operation amongst actors to achieve desired outcomes (i.e. bioeconomy development, promote forest carbon).



Thank you

