

Additional information to the consultation on the renewed sustainable finance strategy

by CEPF
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Comment to the Question 11 on Sustainable Finance agenda and reflections to biodiversity loss

Addressing biodiversity is very important. Current EU biodiversity strategy and its action plan has ambitious goals for biodiversity conservation. It would be more feasible to keep in line with the regulation that will be decided under that process to avoid contradiction and overlapping.

As far as forests are concerned, it should also be noted that there already is work done related to prevention of biodiversity loss and mainstreaming biodiversity actions to everyday forest management. At the same time with growing importance to biodiversity maintenance, there is a growing demand for the carbon sequestration in forests and harvested wood products. There needs to be a balanced outlook to give forests opportunity to serve all the needs of the society.

It should be noted that forests and forestry are already being regulated by multiple laws, regulations and strategies. It is easy to make contradictory regulations and interpretations of them. Examples of existing regulation are EU Timber Regulation at EU level, and forest laws and acts at the national level.

It should also be kept in mind that in forests ecosystems things develop slowly and management operations happen seldomly (when compared to agriculture or fisheries for example). Therefore, as far as forests are concerned, these long-term specificities should be considered.

Comment on the Question 82 on environmentally harmful activities and assets

First of all, it was difficult to answer this question, because we were not able to identify the activities referred to as environmentally harmful.

As forests are concerned, Sustainable Forest Management defined in Forest Europe process and encompassed in national forest legislations, guarantees the sustainability in forestry. The Sustainable Forest Management is also recognized in the Renewable Energy Directive (RED II) and the Directive for land-use, land-use change and Forestry (LULUCF). These national and EU rules ensure that forest related activities provide environmental benefits.

In addition, we find it would be important to reconsider the subsidies and tax exemptions for fossil energies. Otherwise there will never be a level playing field between renewable energies and fossil energies and hitting the Paris agreement (zero emissions 2050) will not be possible.

