

**EUROPEAN COMMITTEE OF THE REGIONS - STAKEHOLDER CONSULTATION
"THE EUROPEAN CLIMATE PACT"**

Contribution to the opinion of the Rapporteur Rafał Kazimierz TRZASKOWSKI

The Commission intends to propose an increasing of the EU's GHG emission reductions target for 2030 to at least 50% and towards 55% compared with 1990 levels. In this respect, the EOS would like to provide some considerations related to the role of biomass-based products and nature-based solutions in achieving a sustainable, circular and environmental-friendly economy.

Today, 55% of the world's population lives in urban areas, a proportion that is expected to increase to 68% by 2050. Projections show that urbanization, the gradual shift in residence of the human population from rural to urban areas, combined with the overall growth of the world's population could add another 2.5 billion people to urban areas by 2050, with close to 90% of this increase taking place in Asia and Africa. This will imply the need for more buildings and more products.

Protecting the environment means ending our dependence on fossil fuels-based products. The European climate pact should build a legislative framework that create favourable conditions for placing on the market sustainable and climate friendly products and enhancing solutions that already exist such as the Bioeconomy.

The European sawmill Industry is the backbone of the bioeconomy and has a great potential to reduce CO2 emission by providing the most sustainable environmental products particularly in the construction sector.

If the EU is to achieve its zero-carbon target in 2050, an enhanced use of wood-based products in construction is fundamental. The Intergovernmental Panel on Climate Change has produced a report on "climate change, desertification, land degradation, sustainable land management, food security, and greenhouse gas fluxes in terrestrial ecosystems" in August 2019 in which it states that "Sustainable forest management can maintain or enhance forest carbon stocks, including by transferring carbon to wood products, thus addressing the issue of sink saturation. Where wood carbon is transferred to harvested wood products, these can store carbon over the long-term and can substitute for emissions-intensive materials reducing emissions in other sectors.

To this end, **the European Climate Pact needs to recognize the benefits of wood as a building material.** Wood is remarkably strong in relation to its weight, and it provides good insulation from the cold. Wood is highly machinable and can be fabricated into all kinds of shapes and sizes to fit practically any construction need. **Wood** is also the perfect example of an environmentally sustainable product; it is biodegradable and renewable and **carries the lowest carbon footprint of any comparable building material.** In addition, no high-energy fossil fuels are required to produce wood. The Updated Bioeconomy Strategy, published by the European Commission in October 2018, states that "the circularity and defossilisation of major economic sectors, including [...] the wooden construction sector, offer possibilities for long-term carbon sequestration and implementation of the low carbon economy". **EOS thus calls for a climate pact that in line with the Bioeconomy Strategy encourages the utilization of wood as a building material.** Everyday life is dominated by non-renewable consumables and products. Bio-based applications are still representing a minor share of materials consumed and we need to create the conditions to enhance the use of timber in construction.

As recognised in the Regulation EU 2018/841 (Regulation on Land Use, Land Use Change and Forestry), the LULUCF sector provides biomaterials that can substitute fossil- or carbon-intensive materials and therefore plays an important role in the transition to a low greenhouse-gas-emitting economy.

- **The European sawmill industry believes that while the regulation EU 2018/841 is an adequate instrument for calculating the emission from the LULUCF sector, it could be further extended. PRODUCT SUBSTITUTION SHOULD BE CONSIDERED AS AN EFFECTIVE LONG-TERM CLIMATE CHANGE MITIGATION STRATEGY THAT COMPLEMENTS THE FOREST CARBON SEQUESTRATION.**

Harvested wood products can retain the carbon for various periods of time, depending on the end uses. In wood products, carbon is bound until the products decay or until these are burned as bio-energy source. On the other hand, using HWP in place of more GHG-intensive materials and using wood bioenergy to substitute for fossil fuels result in reduced fossil fuel emissions. When legally harvested from sustainably managed forests, wood products play a key role in decarbonising the economy, particularly the construction and furniture sectors.

- **IN ORDER TO ACHIEVE THE GHG EMISSION REDUCTIONS TARGET FOR 2030 TO AT LEAST 50% AND TOWARDS 55%, THE EU COMMISSION SHOULD PUT IN PLACE A MECHANISM THAT REWARDS THE CARBON NEUTRALITY OF WOOD PRODUCTS AND THE CLIMATE BENEFITS OF MATERIAL SUBSTITUTION.**
 - As first step, the EU Commission should launch a comprehensive study in order to explore **potential mechanisms to allocate carbon units for storage in wood products.**

Increasing the use of wood or wood-based materials in construction and in products such as furniture, cabinets, flooring, doors and window frames represents a significant opportunity for emission reductions. With growing pressure to reduce the carbon footprint in buildings, designers are increasingly called upon to balance functionality and cost objectives with reduced environmental impact. Wood is a natural choice. **It's renewable, recyclable, and has a lighter carbon footprint than other construction materials.** Wood used for the construction of buildings, especially multi-use buildings (e.g. office buildings), have the highest level of avoided emissions for all solid wood products when substituting steel and concrete. This is mostly due to the amount of material being displaced and the emission-intensity of steel and concrete.

(Source: <https://cfs.nrcan.gc.ca/publications?id=37087>).

Additionally, it is the only structural building material with third-party certification systems in place to verify that products come from a sustainably-managed resource.

European producers use wood coming only from sustainably-managed forests to ensure that the wood we use minimizes its footprint on local ecology, habitats and peoples.

In Europe, 33 % of the total land area (215 million ha) is covered by forests, with a positive trend of increase for the forested areas. Other wooded lands cover an additional area of 36 million ha. 113 million ha are covered by coniferous forests, 90 million ha by broadleaved ones and 48 million ha by mixed forests. (Source: JRC). Many of Europe's forests are managed to produce wood to make paper, or timber for construction, or as fuel. As trees in those forests are felled, more are planted, and **European forests expand by an area the size of 1,500 soccer pitches every day.** (Source: the World Economic Forum).

Nevertheless, **forests might be negatively affected by climate change causing an increase of the forest disturbances.** Climate change have an effect on important abiotic (re, drought, wind, snow and ice) and biotic (insects and pathogens) disturbance agents. Warmer and drier conditions particularly facilitate, drought and insect disturbances, while warmer and wetter conditions increase disturbances from wind and pathogens. Widespread interactions between agents are likely to amplify disturbances,

while indirect climate effects such as vegetation changes can dampen long-term disturbance sensitivities to climate. Future changes in disturbance are likely to be most pronounced in coniferous forests and the boreal biome. (Source: Nature Climate Change 7:395-402 · July 2017)

THE EUROPEAN SAWMILL INDUSTRY CALLS FOR:

- **IN THE FRAMEWORK OF THE “2030 CLIMATE TARGET PLAN” THE EU COMMISSION SHOULD TAKE INTO CONSIDERATION THE NEGATIVE IMPACT OF CLIMATE CHANGE ON FORESTS AND MOBILISE EU R&D RESOURCES IN ORDER TO TACKLE THEM, BEARING IN MIND THAT EU FORESTS CONDITIONS VARY SUBSTANTIALLY ACROSS COUNTRIES.**

- **THE CREATION OF AN EU FOREST RESOURCE MONITORING SYSTEM AIMING AT PROVIDING REAL-TIME INFORMATION ON THE EUROPEAN FOREST RESOURCES AND AIMING AT FORECASTING THE IMPACT OF NATURAL DISTURBANCES ON WOOD AVAILABILITY.**

Created in 1958, the European Organisation of the Sawmill Industry (EOS) is a Brussels-based non-profit association representing the interests of the European sawmilling sector on European and International level.

Through its member federations and associated members, EOS represents some 35,000 sawmills in 12 countries across Europe (Austria, Belgium, Croatia, Denmark, Finland, France, Germany, Latvia, Norway, Romania, Sweden, Switzerland) manufacturing sawn boards, timber frames, glulam, decking, flooring, joinery, fencing and several other wood products. Together they represent around 77% of the total European sawn wood output in a sector that has a turnover of around 35 billion EUR and employs about 250,000 people in the EU.