





January 2023

Trade union position on the New EU Forest Strategy for 2030

The European Federation of Building and Woodworkers (EFBWW), the European Federation of Food, Agriculture and Tourism (EFFAT) and industriAll European trade union represent the interests of workers in the forest and wood sector, i.e. workers in the forestry, saw mill, wood processing and pulp and paper sectors.

In July 2021, the European Commission adopted a communication on the new EU Forest Strategy for 2030¹. Elaborated at the onset of rapidly accelerating climate and biodiversity crises, it sets out the policy framework aiming at creating growing, healthy, diverse and resilient forests in the EU that make an important contribution to biodiversity objectives, provide livelihoods in rural areas and beyond, and support a sustainable forest bioeconomy based on forest management practices that are as sustainable as possible.

The communication states that "Given the increasing and sometimes competing demands on forests, we must also ensure that the amount of wood we use remains within the sustainability limits and is optimally utilised in line with the cascading principle and the circular economy approach". The Strategy also specifies that all relevant stakeholders and levels of governance must be involved.

According to the European Union's vision, this Strategy is to be combined with the support of downstream sectors, such as wood processing, construction and pulp and paper, in order to implement the EU's sustainability strategy. This Strategy is anchored in the European Green Deal as well as the biodiversity strategy and is intended to contribute to the Fit for 55 package.

The European Trade Union Federations EFBWW, EFFAT and industriAll Europe welcome the new Strategy as its target is to have more sustainable and resilient forests, which are essential to achieve our climate objectives.

Page **1** of **9**

¹ COM[2021]572 final of 16 July 2021







EFBWW, EFFAT and industriAll Europe also underline the importance of employment in the forest-based industries' cluster, which employs more than 4 million workers in the EU. These workers work in predominantly small and medium-sized enterprises, often in disadvantaged rural areas in the EU, and thus represent an important contribution to the economic development of the EU as a whole.

These sectors and industries are deeply linked to European forests and need - more than any other sector - sustainable forests. Moreover, these sectors are of paramount importance for the development of a climate-friendly and sustainable EU. Recent EU policies exemplifying this importance, i.e. the New Bauhaus Initiative, clearly show a growing need for wood as a raw material for many applications, not least in construction. Without a comprehensive approach that leaves no one behind, and balanced policy to support these sectors, the EU's climate-related goals will not be achieved.

The central problems of the EU's forests and the use of forest products in wood processing, construction and the pulp and paper industry, are as follows:

- Forests are suffering massively and increasingly from climate change. Drought and
 pests are causing enormous damages, impairing the performance of forestry as a
 whole. Forest fires and widespread forest dieback are the generally visible signs of the
 failed forest policy and management of recent years.
- Wood and wood products receive far too little attention from European policy makers. This particularly affects the wood processing industry, but also the construction industry and the paper and pulp industry, which do not have sufficient access to domestic wood and wood products providing the raw material for further processing (for example, pulp and paper). Domestic wood is currently not considered to be a strategic raw material.
- The training and employment of workers have been cut back so much in recent years that there are now insufficient numbers of skilled workers to solve the growing







problems in our sectors. Working conditions (especially in occupational health and safety) and wages are still disadvantaged compared to other sectors.

- One aspect of all relevant fields of foresting and forest management, like biodiversity, forest management, forest information systems, and used technology, is related to science. Related EU policies and programmes like Horizon Europe, or the fund for the development of rural areas, should become stronger, linked to the forest sector.
- The future development of the forest sector and its attractiveness are equally decisive
 aspects for a successful implementation of a sustainable EU Forest Strategy. The
 European Commission, in collaboration with the sectoral social partners and other
 stakeholders, should put this aspect high on the agenda.

The European Trade Union Federations EFBWW, EFFAT and industriAll Europe welcome the European Commission's approach to reduce these problems and achieve more far-reaching solutions by means of a European Forest Strategy.

However, we would like to insist on the importance of employment and the contributions of the industries in our sectors to be placed at the centre of the Strategy in order to solve the problems described:

- Forests must be better protected
- The raw material wood and the forest-based value chains must be promoted more strongly and understood as an opportunity for diverse uses (especially constructional and energy-related)
- Our industries need better access to the raw material wood
- The disadvantaged rural areas must be integrated more strongly into the focus of the Strategy







- More European structural funds should be dedicated to the forest sector and its various needs and the European Agricultural Fund for Rural Development should be better equipped
- Besides the involvement in the FOREST EUROPE structures, the EU should provide a
 platform for European, cross-border and joint development of modern forest
 management, including aspects such as the use of technology and the qualification of
 workers
- A better coordination of detecting and fighting forest fires is needed, including regular cross-border visits and joint drills

The European Trade Union Federations EFBWW, EFFAT and industriAll Europe stress the importance of forests for sustainability and biodiversity in the EU and support all efforts to make our sectors more sustainable.

This is why the European Trade Union Federations EFBWW, EFFAT and industriAll Europe are asking to integrate these demands into the implementation of the EU Forest Strategy:

- The role and success of forest-based value chains, including their impact on employment in rural and semi-urban areas, should be considered strategic to achieve the objectives of the Green Deal
- There is a need to better understand and reward the full climate benefits of forests and forest-based products, including the substitution of fossil fuel products and energy
- Social dialogue should be used as a tool to develop and implement the objectives of the Strategy
- Without modern framework training, the goals of the Strategy will not be achieved
- A task force to combat forest fires should be set up in the EU
- An impact assessment is now urgently needed







Development of our main cross-sectoral demands:

1. The role and success of forest-based value chains, including their impact on employment in rural and semi-urban areas, should be considered strategic to achieve the objectives of the Green Deal

The EU Forest Strategy lacks a more balanced approach to sustainable forest management and undervalues the economic and social role of forests. In particular, the role of forest-based industrial value chains to achieve the goals of the Green Deal through a Just Transition agenda, including job creation in forward-looking bioeconomy sectors, is overlooked. We consider that the lack of a sufficiently strong social pillar in this Strategy may undermine any green policy and must henceforth be corrected.

While recognising the role of some forest-based products in mitigating climate change (particularly long-lived wood products), the Strategy lacks an understanding of the interlinkages of different forest-based value chains with forests and with each other. The forest-based circular bioeconomy is a unique example of an integrated industrial ecosystem in which materials, by-products and residues are supplied through the different parts of the value chain to make the most efficient use of resources, including through recycling.

Silvicultural measures required to produce large diameter trees suitable, for example, for construction products, require regular harvesting of small diameter trees used for example for pulp and paper production. Residues from primary wood processing are also turned into paper and cardboard. This means that the important principle of the cascade use of wood is already a market-based reality in the forest sector. Following the cascade principle, the design of support schemes for bioenergy should prevent market distortions.

We also support the idea that it is up to Member States to decide how these principles are applied, taking into account regional specificities. The aim of EU policy should be to sustainably increase the availability of woody biomass for all purposes and to enable the continuation of efficient resource allocation. The strategy should focus on the formulation of the most







important objectives while the day-to-day forest managements should be decided and implemented at the national level.

The sustainable mobilisation and efficient use of resources are prerequisites for the further development of the forest-based circular bioeconomy. The implementation of the Strategy should promote, support and incentivise this development. This must include political reactions when the market mechanisms fail, as we see with the devastating export of wood to other economic areas (like China), finally endangering forest-based industries in Europe.

2. There is a need to better understand and reward the full climate benefits of forests and forest-based products, including the substitution of fossil fuel products and energy

Products from the forest are crucial to cope with climate change. The Strategy rightly recognises the central role of Europe's forests in achieving the EU's climate targets, but focuses almost exclusively on the climate benefits of forests as carbon sinks, as opposed to the synergistic effects of carbon capture, storage and substitution. Although sinks play a crucial role in mitigating climate change by removing the equivalent of about 10% of the EU's greenhouse gas emissions, the substitution factor is equally important as it allows for a further 10% reduction in emissions, or 410 million tonnes of CO2 equivalent per year. In addition, it should be noted that the substitution benefit is not limited to the so-called durable wood products. For example, it shows that fibre-based products can have a substitution factor of 1-1.5 kg C/kg C (packaging and chemicals) to 2.8 kg C/kg C (wood-based textiles). The overemphasis on sinks is shown, among other things, by encouraging Member States to develop ecosystem payments for forest owners and managers, and by presenting carbon management as an alternative business model for forest owners, while no specific measures are foreseen to improve the substitution of fossil materials.

While the European Union is proposing initiatives to move towards a more circular economy, we miss the potential of substitution. The substitution effect achieved via the use of biogenic circular products lead the move from a linear, fossil economy to a circular bioeconomy and might be better reflected in the forest strategy.







This narrow approach should be corrected. Sustainable, active forest management increases the contribution of the forest sector to climate change mitigation goals, while reducing vulnerability to droughts, fires, insect outbreaks, diseases, erosion and other disturbances, as also recognised by the IPCC (Intergovernmental Panel on Climate Change). Such a holistic view should also be supported in the design of potential carbon management schemes, which should provide incentives for forest growth through active and sustainable forest management, as well as for extending carbon storage in forest-based products and agriculture. Carbon storage in forest-based products and the substitution of carbon-intensive materials and products must therefore be given greater consideration.

3. Social dialogue should be used as a tool to develop and implement the objectives of the Strategy

Achieving our climate goals should ensure the creation of quality jobs and social progress for all. The European Green Deal agenda, as well as the Forest Strategy, should be an opportunity to maintain and create quality jobs and promote decent work. The Forest Strategy must take into account the 'Just Transition'. The involvement of social partners in the anticipation and social management of industrial change is a prerequisite. Therefore, we call on the European Commission to take these considerations into account in the implementation of the EU Forest Strategy when preparing an implementation plan and involving stakeholders.

There are active social dialogues in our sectors at European and national levels, promoting the development of jointly shared strategies and policies. It is a prerequisite for decent work, fair wages, and facilitates the transition towards a more sustainable economy by developing joint understandings of the challenges and the way to address them. It enables social partners to discuss and negotiate solutions that mitigate negative employment consequences and guarantee high-quality jobs throughout the transition.

The Forest Strategy mentions here and there the involvement of social society, but not the involvement and needs of workers that are at the heart of the forest-based industry. Social dialogue should play a role in developing and implementing such strategies. Indeed, many aspects of the Forest Strategy are related to economic activity/ working conditions/







qualifications and knowledge/ innovation. All these issues are relevant to or managed by owners, employers and workers.

In the Commission's view, it seems that the social dialogue only plays a role in enforcing what has been decided or developed elsewhere (politics, science, civil society). This is not only dysfunctional, but discriminates against the social dialogue and ignores the fact that the different levels of social dialogue are closest to the material issue of forests, and has enormous knowledge of many of the aspects discussed in the Forest Strategy.

4. Without modern framework training, the goals of the Strategy will not be achieved

As the different sectors linked to forestry are going to face a transition, workers must be equipped to face the major transformation of industries so that no one is left behind. The current workforce needs updates and continuing education in the training curricula. A skilled workforce primarily means further training for workers, but also for forest owners and other professionals involved in the chain, including training for trainers. Facing diverse technological innovations in forest work and management, the current design of professions needs to be assessed. This process should also include the adaptation of the overall work-division, aiming at providing better career paths for forest workers. As a kind of repercussion, both these aspects will make the sector more attractive to young persons.

The implementation of the Strategy should absolutely take into consideration the skills challenges via vocational education and training. This means that everyone should have access to high-quality training, re- and upskilling, irrespective of age, occupation and employment status, leading to validation/recognition of acquired skills.

5. A task force to combat forest fires should be set up in the EU

One major threat for the future of our forests in Europe- to its sound growing, its capacity to provide the needed amount of raw material, but also for its other functions, including its function for leisure, regeneration and as playing and learning space for children - are forest fires. We face more and more large-scale fires, destroying large areas of wood and emitting amounts of CO² emissions, foiling all the societal efforts to reduce CO² emissions.







Against this background, we see an urgent need for a better coordination between Member States, which requires an active EU role to support the growing challenges.

- The European task force to fight forest fires must be better equipped, including a higher number of planes and helicopters.
- The information systems used to observe forests and to detect forest fires need
 equally better coordination. The further development of these systems and the
 advanced use of drones in monitoring activities and in fire-fighting should be better
 coordinated and supported via the Horizon programme.
- Regular joint drills with forest firefighters from various countries and at different areas
 must be organised and should become an integral part of the EU Fire Fighting Task
 Force.
- Special programmes should be launched aiming at attracting young persons to this
 type of work. European camps for young forest firefighters and interested young
 persons can be very attractive and should be combined with insight into the
 technological future of this work and its important role in managing and minimising
 climate change.
- A coordinated EU thinking on the creation of "firebreak" spaces to avoid the propagation of fire from one plot to another and to facilitate the intervention of firemen's vehicles.

6. An impact assessment is now urgently needed

Given the many issues with unclear consequences, unions call to anticipate the changes and for a comprehensive impact assessment of the Strategy to identify the effects on market conditions, rural areas and the different funding needs, including for research and innovation, skills development, infrastructure, climate change mitigation and adaptation, and biodiversity promotion.