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# Feedback from:

Bioenergia ry - the Bioenergy Association of Finland

## Feedback reference

F535642

#### Submitted on

30 June 2020

## Submitted by

The Bioenergy Association of Finland

#### User type

Business association

# Organisation

Bioenergia ry - the Bioenergy Association of Finland

## Organisation size

Micro (1 to 9 employees)

# Transparency register number

 $174042620514-51 \ (http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=174042620514-51 \&locale=en)$ 

# Country of origin

Finland

### Initiative

EU Strategy on Adaptation to Climate Change (/info/law/better-regulation/have-your-say/initiatives/12381-EU-Strategy-on-Adaptation-to-Climate-Change)

We focus our comment on adaptation in forest management.

Forests covers 43 percent of EU's land area and provide renewable products and energy in addition to other ecosystem services, such as a habitat for species and recreation. Bioenergy is the most important renewable energy form in Europe and will remain so and grow during the next decade. This initiative of the Commission will help to understand the links between adaptation to climate change and different forest ecosystem services.

Climate change has already caused unpredictable forest fires, bark beetle damages with considerable effect on timber market, sawn wood market and solid biofuel market. The economic losses of forest fires etc. are growing and market disturbances cause remarkable losses for industry. Even if it is not desirable and should be prevented to the extent possible, the market can in the future have a significant oversupply of low-quality timber and pulpwood due to different disturbances. The bioenergy sector can be used as a last resort vehicle to respond to this oversupply.

It is very important also in the future that wood can be used for different kinds of products such as houses, furniture, paper products and energy according to market driven cascading.

For biodiversity climate change is a serious threat and there will be several losses in biodiversity especially for northern species. Increasing storms, forest fires, drought, pests and diseases imply permanent changes in biodiversity compared to the current situation. Climate change will also affect the growth of forests, which is critical for EU's climate neutrality aims. Both the forest carbon sinks and the existing carbon storage in old forests are at risk because of climate change. Old forests in protected areas are unfortunately also a health risk for other forests surrounding them. Active forestry can be used to maintain healthy forests with potential restricted interventions in protected areas. In non-protected areas, a favorable age distribution can be maintained with active forestry. However, it is necessary to manage forests in a way that leaves more decaying wood in order to maintain and improve biodiversity of the species thriving on that phenomenon.

Biodiversity means diversity in forests of all ages. Forestry practices developed in a broad cooperation and adjusted for national conditions are often a cost-effective alternative to protection for many species. The forthcoming Forest Strategy can become a key document for adaptation to climate change in forest management and keeping our forests healthy with high biodiversity values, while we at the same time produce ecosystem services and wood for products and use different side-streams for energy.

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