

# Confor response to: EU classification system for green investments

## Introduction

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Confor ([www.confor.org.uk](http://www.confor.org.uk)) is the not-for-profit organisation for the UK's sustainable forestry and wood-using businesses. It has 1,500 member companies, representing the whole forestry and wood supply chain.

The [EU consultation on Sustainable Finance](#) includes provisions in Annex 1 which would apparently exclude fast-growing plantations from being recognised as carbon-beneficial to the EU, even if they are certified.

## Confor response

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Global timber demand is predicted to treble by 2060. Incentivising fast-growing timber is vital for decarbonisation because:

- Without adequate supply of timber to meet the world's needs, natural forests will be under pressure to be harvested, risking vital carbon sinks and biodiversity habitats.
- Using timber for long-term uses, for example CLT in buildings, creates an important medium-term carbon sink.
- Substituting materials like concrete, steel, plastic and oil for wood-based alternatives reduces the carbon emissions associated with these materials.
- Fast-growing planted forests provide larger volumes of wood on smaller areas of land, allowing more space for other uses including food production and protection of natural habitats.

The importance of fast-growing, non-native planted forests to decarbonisation is clear in the UK Climate Change Committee's recent recommendations to the UK Government.<sup>1</sup>

Non-native species should not be considered as a collective. Species which pose specific risks, such as invasiveness, fire risk, water shortage or disease, should be treated individually on that basis. This should also apply to native species, which can also pose all those risks, which are often more a result of silviculture than species. The forestry species which are widely used are the result of decades of research and experiment, and in many cases native trees cannot deliver the quality and quantity of timber we require.<sup>2</sup>

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<sup>1</sup> [Confor briefing on 6<sup>th</sup> carbon budget](#), p.11

<sup>2</sup> See Ennos, '[Is the introduction of novel exotic forest tree species a rational response to rapid environmental change?](#)'

Evidence from the UK and Ireland demonstrates that well-designed planted forests of non-native, incorporating a native element and certified to PEFC/FSC standards, can deliver significant benefits to biodiversity.<sup>3</sup>

In his *Our Planet* video, 'How to restore our forests', David Attenborough emphasises that we must 'farm trees, just as we do other crops, and create a new generation of plantations', to supply the wood we need, and create wildlife corridors to link natural forests.

Confor strongly supports sustainability frameworks, such as the UK Forestry Standard (on which government support for forestry is based) and UK Woodland Assurance Standard (underpinning FSC/PEFC certification). These provide strong standards to ensure that forests deliver net gain for carbon, biodiversity and people; deliver climate adaptation benefits such as fire, flood and soil protection; as well as providing high volumes of wood for the bioeconomy.

In the UK, over the past 20 years these frameworks have resulted in the incorporation of many thousands of hectares of native broadleaf woodland and open space into old-fashioned plantations, the retention of large volumes of standing and fallen deadwood, and the protection of important species which have moved into these forests. Mature frameworks like these should form the criteria for economic activity which qualifies as contributing to climate change mitigation and adaptation. They are continually developed and improved through collaboration between forestry businesses, governments, and conservation organisations. Forests are annually audited by independent bodies. These governance and auditing processes ensure that they deliver real benefits and not greenwash.

The provisions listed in the consultation document are by comparison extremely broad-brush, and by simple exclusions of large swathes of accepted activity, risk disincentivising forestry in favour of investments in non-renewable materials, immature technologies, and processes which are far more destructive and far less 'close to nature'.

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<sup>3</sup> Confor report, [Biodiversity, forestry and wood](#) (2020).