**EU:s forest strategy**

The Swedish Wood-Fuel Association is an organization for Swedish producers of solid wood fuels within the forest and recycling industry. We see that bioenergy is an essential key to leave the fossil dependence. In Sweden have the oil dependence decreased from 75 % in 1991 to 25 % today. This has been possible thanks to mainly bioenergy. Bioenergy is one of the products that forests deliver to the society.

We think that the focus of the roadmap is to narrow and is missing understanding of the whole value chain of forests and forestry. It does not take consideration to the development of a circular bioeconomy. Forests take up carbon, store carbon in trees and further into energy and products. This is a circular process compared to the use of fossil raw materials that add extra carbon to the atmosphere. The perspective should be on sequestration, storage and substitution and on how these processes can be enhanced through active sustainable forest management. We think that all three aspects of sustainability should be included. The strategy should be stand-alone from other strategies. We do not agree that the strategy should be based on the Biodiversity strategy. By doing so, only a minor part of all sustainability aspects is included.

The Strategy should be the key tool to make forest impacting policies work in the same direction. It should create an enabling framework conditions that does not hamper the implementation of sustainable forest management at national level which is a national competence.

The Roadmap is ambitious, and it has many objectives. However, the legal basis for so many various objectives is unclear. In the “problem that the initiative aims to tackle”, the roadmap does not mention directly forests as the producer of wood, which is the most climate friendly raw material. The roadmap also needs to highlight the importance to maintain and strengthen motivation of forest owners and managers to manage their forests furthermore. Instead the good work the forest owner is doing every day should be acknowledged. Finally risk management should be incorporated in the management of forest areas.

We have strong concerns about the call “to foresee measures to avoid or correct unsustainable practices » which implies that forests are not sustainably managed. Clear definition of “unsustainable practices” based on sound information should be provided before making such call.

We do not understand the call “to strive to decrease the loss of forest coverage” given that EU forest coverage has been increasing for decades. A definition of “last remaining primary and old growth forests who may need strict protection” should be provided

We would like to point out the Commission to build on Council conclusions (11/11/20) European Parliament Resolution (8/10/20) which are calling to take a holistic approach to address forests and their multifunctionality, to build on SFM as defined under Forest Europe and to respect the distribution of competences between the EU and Member States