

Feedback reference

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Submitted by

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User type

Non-governmental organisation (NGO)

Organisation

Danish Forest Association

Organisation size

Small (10 to 49 employees)

Country of origin

Denmark

Initiative

[Climate change mitigation and adaptation taxonomy](#)

Danish Forest Association finds it positive that sustainable finance initiative recognizes the significant contributions provided by the forest sector to the overall objective of a carbon neutral Europe.

The forest and forest-based sectors can replace the fossil carbon by a circular bioeconomy and substitute the fossil based and fossil intensive materials and energy. The impact assessment of the delegated acts following the TEG report is therefore crucial to achieve maximum climate benefit from the forestry sector.

Even though forest is national competence EU legislation and strategies are affecting the management of the forest, for example the EU timber regulation and RED II sustainability requirements for biomass in the energy sector. The definition of sustainable forest management in the delegated act is also likely to have a major impact on forest management in Denmark.

Sustainable forest management has been an objective in the Danish national forest act since the latest revision in 2004. Sustainably forest management are defined in various multi stakeholder processes, with Forest Europe process as the foundation for sustainably forest management in Europe.

There is no need for redefinition off sustainable forest management for the purpose of the financial sector. We strongly recommend that the technical screening criteria for determining under which conditions forest related activities is considered to contribute substantially to one or more of the EU's environmental objectives while not causing significant harm to any of the other EU's environmental objectives, are based on the existing definitions.

For more concrete comments we refer to the input sent by NSF – Nordic Family Forestry and CEPPF.