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**CEEweb position on Pan-European Guidelines
for Afforestation and Reforestation
in the context of the UNFCCC**

CEEweb believes that developing guidelines on afforestation and reforestation could provide a useful tool for ensuring that these activities contribute to nature conservation and climate change mitigation objectives at the same time.

We wish to emphasise that when looking for appropriate environmental, social and economic policy responses, it is necessary to consider the whole set of environmental pressures and drivers in order to avoid the shifting of environmental burden in space or time. Within the context of climate change it is important to take into account the following environmental pressures:

- the greenhouse gas emissions from fossil energy sources,
- the greenhouse gas emissions from other natural sources (from soil during intensive land use, deforestation, peatland drainage, etc.), and
- the decrease of the natural vegetation cover (natural vegetation cover greatly contributes to climate regulation as it is also pointed out in the Millennium Ecosystem Assessment).

All these environmental pressures are ultimately linked to the intensifying use of natural resources and the increased use of environmental space in our current consumption and production patterns.

Thus we stress that any climate change mitigation and biodiversity conservation efforts can only bring net environmental benefits if the production and consumption patterns are changed in a way that the total environmental pressures decrease.

We welcome the approach that natural vegetation cover is restored in place of intensively used areas, if it can be ensured that **the environmental pressure shall decrease through afforestation and reforestation in comparison with the previous land use.**

Afforestation and reforestation shall not lead to the application of forestry practices, which altogether require more

1. resources (directly or indirectly needed for the use of machinery, fossil fuels, establishment of facilities),
2. environmental space (used for new infrastructure) and
3. generate more pollution

than the previous land use. The overall environmental pressure is not only exerted on the site of afforestation/reforestation, but also elsewhere through the whole production and consumption chain of related activities.

If this criterion is not met, then reforestation and afforestation efforts will inevitably contribute to biodiversity loss and climate change elsewhere, as the environmental pressure is not reduced, but only shifted in space and time.

For meeting this above criterion in the case of woody biomass production **the environmental and energy balance of the biomass production shall be positive**. For calculating the true energy balance it is necessary to take into account also the virtual energy demand. Within the current energy balance calculations the virtual energy demand is generally not considered, i.e. the energy needed outside the site during the production and the transportation of the input materials (pesticides, fertilizers for biomass production), the used infrastructure (roads, machines, processing facilities for the production of biomass and input materials), as well as the handling of waste (at the end of the life-cycle of all these equipment and infrastructure). Besides, emission of other greenhouse gases (nitrous-oxide, methane, etc.) shall be also taken into consideration during the whole life-cycle of biomass. These factors are in many cases not taken into account (see a more thorough analysis in the CEEweb publication “Biomass dilemma”¹).

For reducing the overall environmental pressure it is also necessary that **the newly created energy production capacities from biomass replace other, fossil energy source based capacities**. If the production of renewable energy is only added on the top of the existing capacities, the total energy use and the related environmental pressure will increase altogether.

As it can be seen, afforestation and reforestation can only bring net environmental and social benefits, if such efforts are embedded into appropriate economic, spatial planning and other regulations. Thus the guidelines **shall encourage the development of a regulatory framework, which can ensure that the environmental pressure altogether decreases** through these and other activities, meaning that less natural resources and less space is used, and less pollution is generated.

Within this context we also welcome that the ecological guidelines detail many ecological aspects of the afforestation and reforestation. However, we stress that the genetic, taxonomic and functional diversity shall increase (or remain constant) in the area as a result of the activities. This includes the formulated guidelines on species composition and structural diversity, which are mentioned in the draft document. However, **only native tree species and local provenances that are well adapted to site conditions shall be used**, and the use of genetically modified or non-native species is not acceptable in any case.

We are convinced that these guidelines, provided that they address the whole set of environmental pressures and avoid the shifting of environmental burdens, can contribute to climate change mitigation and biodiversity conservation. For this, however, a holistic approach needs to be taken and an enabling economic, cultural and institutional environment needs to be developed, which shall be clearly recognised and encouraged in the paper.

CEEweb for Biodiversity is a network of non-governmental organizations in the Central and Eastern European region. Our mission is the conservation of biodiversity through the promotion of sustainable development.

¹ http://www.ceeweb.org/publications/english/Biomass_Dilemma_finalversion.pdf