



The Swedish Government
The Swedish Parliament
The European Commission
The European Parliament

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European commission's proposal for a carbon removal certification framework

European Forum of Northern Sweden (EFNS) is a network for politicians at the local and regional levels from Norrbotten, Västerbotten, Jämtland Härjedalen and Västernorrland. EFNS is a meeting place and knowledge arena where EU policies are analysed and discussed in respects where it affects northern Sweden. EFNS monitors European issues to influence EU legislation, EU strategies and action programmes, and the EU budget. The purpose of EFNS is to safeguard the interests of northern Sweden both in the European arena and in relation to national level issues with a clear European perspective.

Please accept our points of view on the proposal for an EU-framework for carbon removals certifications.

Europaforum Northern Sweden (EFNS) welcomes the proposal for a common EU-framework for carbon removals certifications. When new business models develop, and a market is young, it is important for all parties involved with common rules. Long-term stability with regards to regulations will help an evolving market.

It is also important that this market creates incentives for long-term carbon storage, which is why EFNS emphasizes the importance of storage in buildings for long-term stability of coal sinks. We also recommend an analysis with regards to possible effects on forestry and agriculture. Is there a risk of lower production of essential commodities such as food and woody raw materials? If so, we need to know more about how it may affect the supply of such essential commodities in times of need for preparedness and safety.

Our points of views are as follows:

1. We welcome the initiative to create an EU-framework for carbon removals certifications and that its aim is to support a free and open market.
2. An EU-framework for carbon removals certifications should be designed to favour carbon storage in long-lived products such as wooden buildings. This would favour the production of high-quality timber which contributes to climate goals through a long growing time and therefore high absorption of carbon dioxide before harvest. Coal sinks in buildings are significantly more reliable in the long term than coal sinks in standing forests, which face risks in the form of storm damage, snow fall damage, rot, wildfire, and extensive insect attacks. Risks such as insect infestations and wildfires will also increase over time with higher temperatures because of global warming. Therefore, EFNS would like to see wooden buildings included and regulated in the original text and not left to be added on later by a delegated act.
3. We emphasize that an EU-framework for carbon removals certifications should be based on voluntary participation on behalf of all parties in the market.



4. We believe an analysis is needed with regards to the effects on forestry and agriculture to evaluate if the initiative creates a risk of lower production of essential commodities such as food and woody raw materials. If so, how large is this risk and what effects may it have on the EU-economies, and the supply of essential commodities in the short-term and long-term when it comes to safety and preparedness?

5. An independent supervisory body is needed to guarantee a fair market with equal rules.

6. When it comes to the proposal of the extended use of delegated acts during implementation, we wish to see clear limitations as to the use of these written into the regulation. The member countries need to retain national influence over the implementation. As an example, the monitoring system of land - and thus of land managers - that the European Commission wants to introduce needs to be controlled by EU member states.

7. We do not believe a central EU-based monitoring system is needed nor would be accepted. Instead, the nations' themselves should manage surveillance based on common EU criteria related to the carbon removal framework.

8. Monocultures could well be included in the EU-framework for carbon removals. First, monocultures are highly unusual, at least in Sweden. We have about four percent of this type of forest with only one species according to our one hundred years old university-based forest monitoring system. A monoculture may be the result of a certain type of dry forest land where only one type of dry-resistant tree species survives. Birch forests on northern mountains (fjällbjörkskogar) may also be the only tree species in an area. A monoculture may also be the result of a very long growth period with no thinning where one species has grabbed all space and where a closed crown cover has blocked off sunlight from reaching the forest floor, thereby preventing other species from thriving. This may be an oak forest or a beach forest, which are both valuable forests. It makes little sense to exclude these types of forests from a carbon removal system.

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