



Confederation of European Forest Owners

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Input of Confederation of European Forest Owners (CEPF) to the Commission's draft Action Plan to follow up the Fitness Check of the Nature Directives

CEPF, the European umbrella organisation of national forest owners' organisations, representing the interests of millions of private forest owners across Europe, welcomes the possibility to submit their written contribution regarding the development of an Action Plan to address the implementation challenges of the Nature Directives.

Private forest owners are responsible for managing about 60% of Europe's forest area. Forests play an important role in the Natura 2000 network, with almost 50% of the network being covered by forest ecosystems and almost one quarter of the EU's forests being covered by the Natura 2000 network.

The fact that these forests have been included in the Natura 2000 network as areas with high biodiversity value or potential to reach it, is the result of a long tradition in managing private forests in a responsible and sustainable manner.

Active and sustainable forest management is a dynamic concept, balancing the different economic, social and environmental dimensions. This includes the sustained production of wood as an important renewable raw material, providing 90% of the EU timber demand, while contributing to biodiversity, providing clean water, fresh air, soil stability, securing our landscape and natural heritage as well as protection against natural disasters.

Hence, CEPF highlights the importance to involve private forest owners not only in the development process of this Action Plan, but in all Natura 2000 decision-making and implementation processes, in particular at national and regional level.

With this respect CEPF would like to highlight several points from the private forest owners' point of view that should be taken into consideration when setting up the Action Plan:

- 1) Forest owners are not stakeholders, they are partners. They are the ones who are managing most of the Natura 2000 network and are affected by the Nature Directives. More consideration should be given to forest owners and discussions in this process should be led with forest owners as partners, also allowing for discussions apart from other stakeholder groups.
- 2) A proper recognition of forest owners, their importance in the implementation of the Nature Directives, and the involvement in all stages of the implementation process are crucial for a better implementation. Furthermore, the acknowledgment of property and ownership rights of landowners and their involvement and role in the decision-making process on regional level is crucially important, since this is an important step to obtain a better understanding and acceptance of the Natura 2000 network.



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- 3) Forest owners have to be consulted on the one hand, but on the other hand they also need relevant information concerning the impacts of Natura 2000 on their property. Information must be given with regard to the Natura 2000 network and the consequences and impacts for forest owners if their property is in the Natura 2000 area and affected by measures through the implementation of the network. The European Commission must provide clear guidance to regional and local authorities stipulating that all relevant information is made available to the forest owners. This information should include in a transparent and reliable way the consequences that derive from being a designated Natura 2000 site.
- 4) An adequate monetary investment in the Natura 2000 network of protected sites is needed. As confirmed by the evaluation study, forest owners are bearing implementation burdens and costs for the Natura 2000 network, while others are deriving benefits. There must be legal security on compensation mechanisms and an adequate compensation for all measures going beyond existing national forestry requirements. In this respect, the Commission assessments of the monetary impact of the implementation of the Natura 2000 network should be updated taking into account the extra costs that are assumed by the private sector.
- 5) Legal certainty should be guaranteed for activities on all sites included in the Natura 2000 network. Unclear legal terms like "anything that may affect or influence" have to be avoided. In some member states economic, social and cultural requirements and regional and local characteristics are not taken into account as required when the nature directives are applied. Therefore, there is a need for distinct guidelines on how these interests should be taken into account.
- 6) In a number of EU environmental reports forests are assessed to be in a bad shape. National forest inventories that are collecting data since several decades provide a different picture. The Commission urgently needs to verify the reliability and transparency of the data used for the official EU environmental reports, in order to avoid ideological tendencies. Furthermore, the results of measures aimed at enhancing biodiversity and/or the quality of habitats can only be seen in the long-term, especially in forests. This time lag should be better taken into consideration. In addition, the dynamic aspect of ecosystems increasingly needs to be taken into account. This is further accelerated by climate change, being one of the biggest challenges with a view to biodiversity conservation, significantly modifying ecosystems. This aspect is not considered, neither in the Nature Directives nor in subsequent analysis.
- 7) The College of Commissioners decided to develop an Action Plan for an enhanced implementation of the Nature Directives. This Action Plan has to deliver on an improved implementation of the Nature Directives taking into account all the aspects mentioned above. It would be misleading if other initiatives would also be covered by the Action Plan. All efforts are needed to ensure that the land owners after 25 years existence of the Nature Directive gain a minimum level of trust in the authorities at all levels to implement the Nature Directives in a partnership approach.