



Confédération Européenne des Propriétaires Forestiers
Confederation of European Forest Owners
Zentralverband der Europäischen Waldbesitzer

European Forestry House
66 Rue du Luxembourg
B-1000 Bruxelles
Tel. +32 2 2190231
Fax +32 2 2192191

www.cepf-eu.org

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CEPF review of new EU Forest Strategy

The Communication for a new European Forest Strategy (EUFS) as published by the European Commission on 20 September 2013 is highly welcomed by the private forest owners.

See also **CEPF statement** from 20 September 2013:

http://www.cepf-eu.org/artikkel.cfm?ID_art=598

While a new EUFS is needed, the Commission's communication provides a holistic and balanced approach to all aspects of sustainable forest management (SFM), including socio-economic and environmental aspects. However, the new EUFS will be only effective if properly implemented and recognised as a key reference by the Member States, the different EU institutions and services as well as key stakeholders of the forest sector.

CEPF considers the increased mobilisation and use of wood as renewable raw material and the competitiveness of the EU forest sector extremely important and warmly welcomes their inclusion in the Strategy. CEPF underlines the need to ensure also the full implementation of those targets and measures – such as growth, employment, competitiveness and mobilisation and use of wood – which are not or rather marginally covered and supported by other existing EU legislations.

Although CEPF considers the Commission's communication for the new EU Forest Strategy as positive, there are a few points, which need further considerations:

- Lack of vision beyond 2020
- Strategic orientations good alternative to a Forest Action Plan
- Role of private forest owners not acknowledged in context of Rural Development policy and implementation of Natura 2000
- EU criteria for all biomass and/or SFM to be discussed
- Cascading use of wood – to remain a guiding principle only
- Holding level forest management plans not EU competence
- Improving EU forest policy governance could be more concrete

Lack of vision beyond 2020

CEPF fully supports the proposed guiding principles as well as the 2020 forest objectives. CEPF appreciates that the concept of SFM, as defined under the MCPFE/Forest Europe process, is clearly emphasised and acknowledged as the concept of the European forest sector. However, in contrast to previous discussions, the final communication does not entail a vision. Together with the guiding principles and the 2020 objectives, a vision would have been a strong message to provide the EUFS, and



with this the EU forest sector, a more long-term perspective. Furthermore, references to 2020 projections should be well considered, as estimated developments might look different in future (see e.g. page 1, first paragraph: [...] *harvest rates are expected to increase by around 30% by 2020*).

Strategic orientations good alternative to a Forest Action Plan

In one of the previous statements CEPF regarded the lack of a Forest Action Plan as critical. However, after a thorough evaluation of the Commission's communication CEPF concludes that the newly added 'strategic orientations', which are included additionally to each thematic chapter, provide a strong element for making the EUFS more tangible and an additional Action Plan de facto obsolete. This is particularly supported, as the previous Action Plan did not prove to be an efficient tool to further strengthen coherency and coordination of forest policy at EU level (see FAP final evaluation, EFI 2011).

However, in case a new Forest Action Plan, as an additional instrument for further concrete implementation of the EU Forest Strategy and its strategic orientations, is still foreseen later on, CEPF will support such development.

Role of private forest owners not acknowledged in context of Rural Development policy and implementation of Natura 2000

The Rural Development Policy is the main EU policy instrument that has the capacity to maintain and improve the economic viability of forestry and rural areas whilst preserving cultural landscapes and protecting and enhancing the provision of ecosystem services.

One of the key partners in securing a proper implementation of Rural Development Policy and targets are private forest and other land owners. Thus, the role of private forest owners should be clearly acknowledged in the EUFS chapter 3.3.1 *Supporting our rural and urban communities*. In addition the important role of forest owner associations to strengthen the cooperation and communication between forest owners has to be highlighted.

The successful and sound implementation of Natura 2000 requires an active involvement of those most concerned, namely the forest owners. This aspect has been explicitly mentioned in the old EUFS but is not mentioned at all in the new Strategy. See particularly chapter 3.3.4 *Protecting forests and enhancing ecosystem services*, and respective strategic orientations addressing Natura 2000 and its implementation.

EU criteria for all biomass and/or SFM to be discussed

European forest owners support a holistic approach when demonstrating the sustainability of forest management. Therefore CEPF requires that any development of SFM criteria at EU level should be based on the existing FOREST EUROPE definitions and criteria and indicators for SFM. A thorough analysis of their usefulness – either in current form or appropriately modified – should be a logical starting point for this



process. This is particularly important, as a clear reference to the currently discussed Legally Binding Agreement (LBA) at pan-European level is made in the EUFS.

Furthermore, CEPF likes to underline that any monitoring or verification of SFM at EU level should be based on national/ regional level data and not holding level data, and already well developed and implemented monitoring instruments, like National Forest Inventories, should be used.

In this respect, the meaning and further steps referring to following formulations in the new EUFS should be clarified:

Page 5

For this strategy to be meaningful to those policies that require or might require evidence of sustainable forest management and to reach its goals, objective, ambitious and demonstrable sustainable forest management criteria that could be applied to all uses of forest biomass are needed.

Page 8

The Commission is currently assessing whether additional measures, including harmonised sustainability criteria, should be proposed to address sustainability issues related to using solid and gaseous biomass for heating, cooling and electricity.

Page 8, second listed strategic orientation

The Commission will, together with Member States and stakeholders: Develop objective, ambitious and demonstrable EU sustainable forest management criteria that can be applied in different policy contexts regardless of the end use of forest biomass, by the end of 2014. Appropriate measures will be presented by the Commission.

Cascading use of wood – to remain a guiding principle only

CEPF supports the general principle of resource efficiency (as outlined in the Roadmap to a Resource Efficient Europe) as well as the aim to generate and provide multiple value-added forest products, which secure income for the forest owners. Thus, the Commission's intention to further develop a resource and energy efficient forest sector is greatly welcomed by CEPF.

However, CEPF does not support the inclusion of the cascade use principle into any binding EU legislation. A legally binding approach on cascading use of wood, determining certain priorities and order of using wood, would de facto interfere into the open market mechanisms and conflict with the right of forest owners to dispose

their timber products to different markets. Furthermore, making the cascade use a legal obligation, would require clear definitions, standards, monitoring and control mechanisms, and with this would lead to additional bureaucracy, administrative burden as well as unpredictable costs.

In this respect, the following strategic orientation should be clarified:

Page 8, third strategic orientation:

The Commission will, together with Member States and stakeholders: [...] develop good-practice guidance for this and for the “cascade” principle, as well as on resource- and energy-efficient manufacturing processes, especially for Forest-based Industries, SMEs and micro-firms.

Holding level forest management plans not EU competence

Forest management plans on holding level are strategic and operative tools for forest owners and managers designed to program and implement certain sustainable forest practices on the basis of national legislation. In most countries, forest management plans are a voluntary tool for the forest owners to plan and support the achievement of their own management goals and targets. Consequently, forest management plans are and should not be a matter of EU competence (see principle of subsidiarity).

Member States are obliged to implement appropriate Natura 2000 management plans. At EU level specific measures are in place, e.g. in the Rural Development Policy, supporting the development of Natura 2000 management plans. The linkage made between forest management plans and Natura 2000 plans is confusing. CEPF cannot support any intention to make forest management plans on a holding level an obligatory tool to implement Natura 2000 and its targets.

In this respect, the different paragraphs in the new EUFS addressing forest and Natura 2000 management plans should be clarified.

Page 10, strategic orientations

Member States

- should achieve a significant and measurable improvement in the conservation status of forest species and habitats by fully implementing EU nature legislation and ensuring that national forest plans contribute to the adequate management of the Natura 2000 network by 2020. They should build on the upcoming guide on Natura 2000 and forests.

The Commission:

- will monitor Member States' progress as regards the uptake of forest management plans or equivalent instruments and the integration of



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biodiversity considerations in them, including Natura 2000 conservation objectives.

Improving EU forest policy governance could be more concrete

CEPF supports the Commission's aim to improve forest policy coherence and coordination, and with this also forest governance as well as overall quality of discussions at EU-level. The improvement of forest policy governance should not only be limited to an increased number of meetings and improved cooperation between different parties. The key towards forest policy coherence and respectively broader acceptance among Member States and stakeholders, like forest owners, is the early participation of Commission and Council expert groups in the policy formulation processes.

The importance of the different fora like Standing Forestry Committee (SFC), Advisory Group Forestry and Cork (AGFC), Advisory Committee Forest-based Industries are recognised, but the interplay between these and in how far also the mandate of in particular the SFC and AGFC could be strengthened remains open.

The EU Forest Strategy should be the best relevant document to clearly define the objectives of these two advisory bodies towards the Commission as well as to influence the institutional setup for forest-related issues within the Commission.

Furthermore, though the EUFS makes reference to the possible LBA, this chapter should include further concrete provisions on the later implementation of and linkage with the LBA at pan-European level.