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Joint Position Paper on

Sustainable Forest Management and Natura 2000

The Confederation of European Forest Owners (CEPF) and the European State Forest Association (EUSTAFOR) welcome the European Commission's plan to develop guidelines¹ and their organization of Bio-geographical Seminars on the management of Natura 2000. It is important to exchange experiences and best practices. However, CEPF and EUSTAFOR do not support recommendations which create any further administrative and managerial burdens and which go further than the provisions of the Habitats and Birds Directive.

Recommendations on the management of forests within the Natura 2000 network should consider the following aspects:

The legal context of forests under Natura 2000 is the Habitats and Bird Directive. Therefore, any guidelines and recommendations on forest management within Natura 2000 should remain bound by the provisions of the Birds and Habitats Directives. Guidelines should not create any new interpretations that go beyond the existing jurisprudence. The targets of the Biodiversity Strategy 2020 should not be given precedence over the objectives of Article 2 of the Habitats Directive, which strives to maintain or restore a favourable conservation status only.

The guidance document should contribute to achieve the overall objectives of the Birds and Habitats Directives to maintain and restore a favourable conservation status.

The regional scope of any guidance document has to be clear and has to accept the principle of subsidiary implementation of EU directives into National Legislation. Thus, any guideline document has to acknowledge national, regional and local requirements and needs. Recommendations on the management of forest habitat types should focus on Natura 2000 sites only. The biogeographic perspective goes far beyond the provisions of the Habitats Directive.

The accomplishment of property rights and related financial aspects of Natura 2000 are of major importance for European forest owners. The reasons for the failure to implement Natura 2000 measures in forests result from the infringement of property rights and a lack of adequate financial compensation. Bureaucratic burdens for forest owners, in combination with the absence of adequate payment levels, have led to a very low uptake of the currently available EAFRD funding (only 14% of the Natura 2000 measure 2007-2011). The basic payment level should be increased and the bureaucratic burden needs to be minimised.

Adequately compensating for costs incurred and income foregone in forest areas under Natura 2000 is essential for forest owners all over Europe in order to not further weaken the economic situation of rural areas. Alternative, innovative and tailor-made funding approaches as well as cross-sectoral funding options (e.g. via climate related funds) should be further developed. Best practices need to be further exchanged and communicated.

Member States (MS) in general are obliged to implement appropriate **management plans**, specially designed for Natura 2000 sites only. Natura 2000 management plans for habitat types are therefore an integral aspect of the Habitats Directive. The practical management of Natura 2000, however, is and should remain a matter of MS competence in the future as well. 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

¹ Draft Guidelines on Climate Change and Natura 2000 - 2012, Guidelines for the management of wilderness and wild areas in Natura 2000 – 2012, Guidance on Forests and Natura 2000 - working

basis of national legislation. Consequently forest management plans are not a matter of EU competence (principle of subsidiarity).

The different purposes of management plans should be clarified by examples in the guidance document.

The well-functioning concept of **multifunctional and sustainable forest management (SFM)** is a central element of nature protection in Natura 2000. This concept has proved to be able to continuously integrate multiple forest ecosystem functions (e.g. biodiversity conservation, water management, soil protection, recreational space, production of wood and non-wood products or clean air).

The introduction of **wilderness and non-intervention management** (new terminology for the setting aside of land) is a completely new dimension in the discussion of implementing the Habitats Directive. Until now an integrative and dynamic understanding of nature conservation was stipulated. The wilderness concept calls for a segregated approach, which does not take into account the social, economic and ecological requirements of forests under Natura 2000, and therefore contradicts the formulations of Article 2 of the Habitats Directive. The approach of segregating different forest functions does not fit into the culture of managing forests in Europe.

There are certainly specific situations where rare or valuable habitats should be set aside, however these should be decided on a local level – as rare exceptions – and not by a large scale concept that conflicts once again with the cultural landscapes in Europe.

Based on their long experience of managing 177 million ha of forests in Europe the private and public forest owners and managers believe that successful and practical implementation of Natura 2000 is only possible through an integrative approach, promoting a multifunctional and sustainable forest management.

Forest owners appreciate the EC's **approach of involving all stakeholders** in the process of implementing Natura 2000. The communication and cooperation between forest owners, forest managers and the nature conservation community is seen as most crucial in this process.

Forest owners and forest managers do not only carry rights but also responsibilities for the implementation of policy decisions on the ground and their impact on the sustainable future of their livelihoods and property. Through a strongly committed and dynamic implementation and wide promotion of the concept of sustainable forest management, forest owners and managers are actively contributing to biodiversity conservation. As 50% of the Natura 2000 sites are forests, and approximately 20% of Europe's forests fall under this specific nature protection category, forest owners have to be seen as key partners in the further development and successful implementation of Natura 2000.

We encourage the political decision makers to ensure that the guidance document enables private and public forest owners and managers to further sustainably manage forests under Natura 2000, rather than create new complexity and additional burdens.

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Forests cover about 40% of Europe's territory. About 60% are owned privately by approximately 16 million owners, mainly small-scale forest owners, whereas the remaining 40% are managed by state forest management organisations and other types of public authorities. Forests play a crucial multifunctional role in rural areas. While providing around 3.5 million jobs and a sustainable source of timber, Europe's forests deliver multiple goods and ecosystem services such as biodiversity, clean air and water, soil protection and recreation areas.