



SUBJECT: COMMISSION DRAFT ON EU FOREST ACTION PLAN

BY BIRDLIFE EUROPEAN FOREST TASK FORCE
WITH THE SUPPORT OF FRIENDS OF THE EARTH CZECH REPUBLIC

April 7th 2006

Herewith BirdLife Forest Task Force would like to submit its comments on the latest draft Forest Action Plan (FAP).

We realize that the priority actions within the FAP have to be limited. It is therefore essential that these action points are clearly formulated and unambiguous. We believe taking our comments into account will support responsible forest management throughout EU and improve the balance between the three basic forest functions – environmental, economic and social.

We would therefore urge the Commission to study our proposed changes to the Forest Action Plan detailed below.

1. IMPROVING LONG-TERM COMPETITIVENESS

Core action 1.3:

Original text: Exchange and assess experiences on how to adequately value non-wood forest products as well as non-marketed forest goods and services

The market price should include the social and environmental impact of the forest. Changes in the quality and quantity of the forest resources should be given a monetary value through creation of a real market. Exchanging and assessing experiences on non-wood forest products and non-marketed forest goods and services valuation is only a starting point towards concrete benefits. Instead, we propose the following formulation: **“Assessing market value of social and environmental goods and services which forests provide and encourage development of a real market ensuring forestry operations enhance these values rather than damage them.”**

Core action 1.4:

Original text: Promoting the use of energy of forest biomass for energy generation

The availability of wood for energy production should be assessed looking at it from different perspectives and putting it in the context of climate change and change of land-use management and land functions as well as taking into account the possible impact of these on forest biodiversity. Before any step is taken to promote biomass for energy generation, additional investigations are necessary with the above mentioned respects.

The word combination “low-value timber” needs precise definition for which we propose: “Low-value timber is the felling residues, pre-commercial thinning or tending wood, wood from stands where restoration activities are carried out, such as conversion from coppice wood and plantations to high-stem indigenous tree species forest.”

Core action 1.5:

Original text: Foster the cooperation of forest owners and enhance education and training

We would like to see more explicit formulation of core action 1.5, namely:

"Advisory services to aim also at better dissemination of information related to biodiversity-sensitive management practices as well as improving forest owners' knowledge and skill with regard to forest biodiversity enhancement measures and the need of forest habitats restoration."

Additional actions at a Member State level:

Original text: Seek to identify and remove unnecessary limitations to the use of wood

We insist on clarification or exclusion of this phrase as it might mean limitation of conservation activities as well. Instead, responsible use of wood should be promoted by voluntary and independent certification.

2. IMPROVING AND PROTECTING THE ENVIRONMENT

Core action 2.2:

Original text: Assure the contribution of the EU forest sector to the 2010 biodiversity objectives

In order to support forest protection we urge for the following points to be included in action 2.2:

_ European Commission has approved the set of criteria for selection of Important Bird Areas (IBAs). These areas are of high international importance for birds and should be guaranteed proper protection. Since about half of the IBAs in Europe hold forests this core action should include **designation of all IBAs identified by BirdLife International as Special Protection Areas (SPAs) and urgent completion of the Natura 2000 network.**

_ Encourage information collection for forest species and habitats and support research into setting their favourable reference values;

_ Promote forestry practices that imitate the natural processes

The decline of species population would be mitigated if forests with strict protection are accompanied with much greater share of commercial forest managed by nature-friendly forestry. Many of the species are not restricted only to a certain protected territory but have larger areas of distribution. Less fragmented and continuous forest cover would help these species to reach suitable habitats

Core action 2.4:

Original text: Assure the protection of EU forests against biotic and abiotic agents, including forest fires

Forest fires are a very country-specific problem that should be treated mostly at a Member States level. Instead, more attention should be paid to forest restoration on sites where certain forest types have been degraded by overexploitation.

Additional actions at the Member State level:

Original text:

- _ Carry out afforestation for environmental reasons;
- _ Establish agroforestry systems on agricultural land

The importance of biodiversity on land proposed for afforestation and the establishment of agroforestry systems should be respected. Afforestation and agroforestry practices should not lead to biodiversity decline.

Original text:

- Support restoring of forestry potential in forests damaged by natural disasters and fire;
- Support the introduction of forest fire prevention measures;
- Support studies on the causes of forest fires, awareness raising campaigns, training of personnel and demonstration projects;
- Review and update broader forest protection strategies against biotic and abiotic agents (including forest fires).

The actions proposed currently in the FAP against forest fires are inflated. Natural disasters and fires are often following natural processes and the land affected by them does not always require special restoration activities. On the contrary – left on their own such forests can restore their potential faster and better than when human intervention takes place. We propose the following change: **“Support restoring natural status of forests with potential exhausted by overexploitation”**.

3. CONTRIBUTING TO THE QUALITY OF LIFE

We propose here an additional action:

Indigenous Sami people are among the people most dependent on various goods and services of forests. The Sami are the last and only indigenous peoples in Europe. Forestry measures on Sami land can and should only take place with free prior and informed consent of these peoples. Failure to do so is in contravention of several international Human Rights Agreements such as ILO 169, and the Covenant on Economic, Social and Cultural Rights. It is furthermore in contradiction with the IPF Proposals for Action as well as with article 8j and 10c of the Convention on Biological Diversity. **“The Commission should disseminate information on the sustainable use of forests without industrial forestry to the Sami. The Commission should study whether there is forestry without prior informed consent of indigenous peoples in the Member States. If so, this should be reported to the UNFF and CBD Secretariats.”**

4. FOSTERING COMMUNICATION AND COORDINATION

“The Inter-Service Group on Forestry should establish a regular contact with the Environmental NGOs.” Depending on the interest, in various DGs the Inter-Service group could continue in a coordinating role, with an advisory expert group that should include balanced representation of economic sector, social sector and environmental sector.

“The Standing Forestry Committee (SFC) should be opened up to NGOs.” The three working groups of the SFC need to include good representation of environmental NGOs. Lessons can be learned from development of national forest plans¹ as well as Ornis Committee² how civil society has been included in the processes.

The changes that have been taking place lately in DG Agriculture and DG Environment deeply affect the European Commission’s capacity to deal with forests in an integral manner and lessen the opportunities for good coordination. That is why we strongly recommend the capacity of DG Environment to be strengthened to adequately address internal and external forestry issues as outlined in the new FAP.

A timeline is missing in the draft discussion paper from the Commission to the Standing Forestry Committee. We believe a timeline is necessary for the implementation of the core actions at Community and National level, and would urge for this in the final Forest Action Plan.

We believe the implementation of the EU Forest Action Plan will lead to better results if monitoring and reporting of the implementation of the FAP will be carried out annually. This will allow for adaptations, and inclusion of new actions if necessary.

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¹ Inclusion of NGOs in CBD, IFF delegations and EU forest policy working group subcommittee in Finland

² http://europa.eu.int/comm/environment/nature/nature_conservation/useful_info/committees/ornis_committee/index_en.htm