



THE NEW FOREST STRATEGY

Preliminary position paper, 7 September 2011

Introduction

The EU Forestry Strategy,¹ adopted in 1998, acted as a response to concerns about the lack of coherence and coordination between national forest policies and other forest related EU policies. Though the non-legally binding Forestry Strategy represents the first significant attempt to create an EU-wide framework for forests, its development and implementation left much to be desired.

We have new challenges ahead of us, such as increasing demands for wood resources and continuing biodiversity decline, but no clear mechanism to resolve the trade-offs. There is therefore a need for a new Forest Strategy that sets clear priorities for forests in the EU within a framework of enhanced forest protection and resource efficiency. The new strategy also needs to be more effective in improving coherence between an increasing amount of policies impacting forests in the EU.

1. Analysis of the current Forestry Strategy and EU Forest Action Plan

General issues

As there is no forest policy in the EU, the EU Forestry Strategy,² adopted in 1998, was a response to concerns about the lack of coherence and coordination between national forest policies and different forest related EU policies. Though the non-legally binding Forestry Strategy represents the first significant attempt to create an EU-wide framework for forests, its development and implementation left much to be desired. A review of the implementation of the Forestry Strategy in 2005 revealed that there was a need to strengthen coherence between EU policies, as well as coordination between the European Commission and Member States. It also suggested a more coherent and pro-active approach to governing the EU's forest resources. In 2006, this led to the tabling and adoption of the EU Forest Action Plan (EU FAP)³ for the period 2007-2011.

The EU FAP is however, fraught with internal contradictions. The vagueness of the concept of multifunctionality for example, raises serious questions about how potential conflicts and unavoidable trade-offs between environmental, social and economic components are to be resolved. The plan does not even outline a process for how to develop a clear vision for future forest use in the EU, but tries to please all sectors through emphasising meetings and studies. As a consequence, there is a lack of analysis and no clear performance based targets.

In 2009, the mid-term evaluation of the EU FAP stated that “*the effects of the EU FAP on its specific goals of contributing to long-term competitiveness, enhancing and protecting the environment, and contributing to quality of life cannot be expected to show up after two years of implementation*”; however, the evaluation also

¹ Council Resolution (1999/C56/01) on a forestry strategy for the European Union

² Council Resolution (1999/C56/01) on a forestry strategy for the European Union

³ Communication on an EU Forest Action Plan. COM(2006)302

concluded that “it is difficult to show concrete examples of effects that the EU FAP has had on Community actions or on the forest policies in the Member States”.⁴

Key Action 7: Contribute towards achieving the revised Community biodiversity objectives for 2010 and beyond

Specifically on Key Action 7, many stakeholders stated that “it was difficult to assess to what extent the EU FAP results can drive changes in practice and that there was little to no effect of the EU FAP on the ground (or in the forest) on the issues concerned”. Stakeholders also criticised the mode of operation, and more specifically they stated that a higher impact could have been achieved if the respective stakeholders would have been informed or involved in the discussions actively rather than just as recipients for the information.⁵

Key Action 12: Explore the potential of urban and peri-urban forests

Urban and peri-urban forests (UPF) are important in contributing to the well-being of European citizens and the sustainability of both the urban environment and the wider environment that is strongly impacted by urban activities.⁶ The mid-term evaluation highlighted that the activities related to UPF “are to some extent not so high on the agenda across the EU”⁷ notwithstanding the fact that there is a growing population living in urban areas.

Key Action 14: Strengthen coordination between policy areas in forest-related matters

As mentioned above, improvement of coherence between forest-related policies is a key issue in the debate about the Forestry Strategy and the EU FAP. One of the actions that deals with this topic is Key Action 14:

Key Action 14: Strengthen coordination between policy areas in forest-related terms

- 1. Appoint a coordinator for forest-related policies in each relevant Directorate-General*
- 2. Regularly inform the SFC⁸ of the initiatives and actions in different policy areas that are of relevance to the work of the Committee*
- 3. Strengthen the role of the Inter-Service Group on Forestry*

Even though the mid-term evaluation of the EU FAP judged that the EU FAP “has been efficient and effective in improving the coherence between community actions”, it also stated that “the need for coherent and pro-active approach remains”.⁹

If the activities under Key Action 14 are critically analysed however, one can question if these kind of activities were ever able to really make a difference in terms of increased coherence between forest-related policies.

Key Action 15: Apply the open method of coordination (OMC) to national forest programmes

The EU Forestry Strategy and the EU FAP identified National Forest Programmes (NFPs) as one of the elements through which international (forest-related) principles of sustainable forest management and recommendations should be implemented. Stakeholders have in the past raised questions about how the NFPs have influenced EU policies, and have pointed out that there is a

⁴ Pelli, P. et al (2009). Mid-term evaluation of the implementation of the EU Forest Action Plan. A study for DG Agriculture and Rural Development (AGRI-2008-EVAL-07)

⁵ Ibid.

⁶ http://ec.europa.eu/agriculture/fore/events/28-01-2011/report_en.pdf

⁷ Pelli, P. et al (2009). Mid-term evaluation of the implementation of the EU Forest Action Plan. A study for DG Agriculture and Rural Development (AGRI-2008-EVAL-07)

⁸ SFC: Standing Forestry Committee

⁹ Ibid.

need for better consistency between objectives of relevant EU policies and NFPs. They also stated that there should be regular monitoring of and reporting on the effectiveness of the NFPs.¹⁰

Recent studies question the constructed picture of NFPs as an instrument to achieve policy change.¹¹ They have in some cases functioned merely as legitimising and awareness raising systems for the already present forest policy discourse.¹² One article about NFPs in Germany and Bulgaria mentions: “*The NFPs were not able to permanently and significantly alter the way in which forest policy is made in the sense of becoming a more participatory and pluralistic oriented forest policy process; furthermore they also did not have significant effects on the contents of the forest policy, such as, eg a profound ecologisation of forest management.*”¹³

The recent mid-term evaluation of the EU FAP also indicates the very different approaches of Member States when developing their plans:¹⁴

“NFPs cover a wide range of approaches to develop, program and implement forest policies in a country. NFPs can be formal or informal governmental processes, with the resulting documents formally adopted or not. Some countries identified their NFP as a set of policies or strategies addressing sustainable forest management.”

One specific action in the EU FAP was focused on exploring the voluntary coordination of NFPs. Even though some work was done, the results on this action are limited. If the NFPs are to contribute to better implementation of the EU Forestry Strategy or the EU FAP, then at the very least, their development should be anchored in a clearly defined multi-stakeholder process that ensures no one interest group or aspect of forest multifunctionality dominates the discussion and that the resulting NFPs enjoys broad support among the different actors.

2. Forests in the EU: challenges a new Forest Strategy needs to address

The new Forest Strategy should take into account new challenges that forests and the forest sector are facing.

1. New policy developments increase lack of coherence

The lack of coherence between forest related policies (such as the Common Agricultural Policy, Biodiversity, Energy and Climate policy) is one of the most serious shortcomings of the current EU forest policy. With new policies upcoming, this lack of coherence will possibly increase.

2. Increased demand for timber products should not be the guiding principle

Demands for wood resources have generally been growing over the last couple of decades. The demand for energy wood got a particular boost through the adoption of the Renewable Energy Directive. The biobased economy is also rapidly advanced by the EU. Phasing out

¹⁰ Report from the stakeholder consultation on the draft Commission staff working document in support of the Communication from the Commission to the Council and the European Parliament on implementation of the EU Forestry Strategy.

¹¹ such as in: Høgl, K., Nordbeck, R., Kvarda, E., 2009. When international impulses hit home: the role of domestic policy subsystem configurations in explaining different types of sustainability strategies. *Forest Policy and Economics* 11, 357–364.

¹² Such as in: Primmer, E., Kyllönen, S., 2006. Goals for public participation implied by sustainable development and the preparatory process of the Finnish National Forest Programme. *Forest Policy and Economics* 8 (8), 838–853. and also in: Howlett, M., Rayner, J., 2006. Globalization and governance capacity: explaining divergence in National Forest Programs as instances of “Next-Generation” regulation in Canada and Europe. *Governance: An International Journal of Policy, Administration, and Institutions* 19 (2), 251–275.

¹³ Winkel & Metodi (2011). An obituary for NFPs? Analyzing and learning from the strategic use of new modes of governance in Germany and Bulgaria.

¹⁴ Pelli, P. et al (2009). Mid-term evaluation of the implementation of the EU Forest Action Plan. A study for DG Agriculture and Rural Development (AGRI-2008-EVAL-07)

petrochemicals will also require use of other raw materials in addition to significant reductions in consumption.

In a densely populated, high-consumption region like the EU with little scope for expanding forest cover without increasing the EU's footprint elsewhere in the world, increased demand for timber will inevitably lead to more intensive forestry practices that will decrease the carbon storage capacity of forests and have negative impacts on biodiversity. The EU lacks a strong policy that can deal with the conflicts that will arise from trying to balance different demands. The debate on the future of forests in the EU is too focused on meeting the demand for timber while ignoring the question of what forests can sustainably supply and how the different demands on forests – not only for timber but also for social and environmental needs - can be reconciled and fulfilled while at the same time maintaining and restoring diverse and resilient forests.

3. Contradictory strategy to deal with adaptation and mitigation to climate change

Forests play a major role in the global carbon cycle but are now coming under increasing threats from climate change itself. Maintaining and restoring biodiversity in forests promotes their resilience to human-induced pressures and is therefore an important “insurance” policy and safeguard against the loss of forest value and functionality and against expected climate change impacts.¹⁵ Even though there is a lot of uncertainty about the full extent of climate change impacts and the suitability of adaptation measures, there seems to be an agreement that risks can partly be mitigated by adhering to a number of forest management recommendations which include maintaining diversity at different levels including genetic and species diversity, stand and structural complexity, and connectivity across landscapes, etc.¹⁶

Current EU policies however give contradictory messages to deal with adaptation and mitigation to climate change. Management practices needed to build up forests' resilience to climate change are at odds with intensification of forest management practices as a consequence of new demands such as bioenergy.

4. Concept of sustainable forest management as currently applied is not strong enough to deal with upcoming conflicts of interest and unavoidable trade-offs between different forest functions.

Although the principle of ‘multifunctionality’ of forest management as advocated by the EU, gives - in theory - equal importance to ecological, economic and social considerations in forest use, in practice, perceived or real economic benefits have always prevailed, leading to a serious loss of biodiversity and hampering the capacity of forests in the EU to mitigate climate change. Because of this, forest protection measures need to be prioritised.

The interpretation of the concept of sustainable forest management (SFM) is increasingly guided by meeting growing timber demand rather than considerations of sustainability or multifunctionality. There is increasing pressure to consider intensive forestry management practices such as stump uprooting as part of SFM. Management practices which were taboo yesterday because of their documented high impact on biodiversity, seem to be strongly pushed today in the face of increased demand for wood.

5. The EU and its Member States failed to reach the 2010 biodiversity goal

In 2009, the European Commission published a report on the conservation status of Europe's most vulnerable habitats and species protected under the Habitats Directive. The results show

¹⁵ Thompson, I., Mackey, B., McNulty, S., Mosseler, A. (2009). Forest Resilience, Biodiversity, and Climate Change. A synthesis of the biodiversity/resilience/stability relationship in forest ecosystems. Secretariat of the Convention on Biological Diversity, Montreal. Technical Series no. 43, 67 pages.

¹⁶ Lindner

that only a small proportion of the habitats and species of Community interest have a favourable conservation status. The conservation status of species and habitats of European interest in forest ecosystems differs strongly between biogeographical regions, but altogether, more than 50 per cent of species and nearly two thirds of habitats in forest ecosystems have an unfavourable conservation status.¹⁷

If most of the vulnerable habitats and species in forests across the EU have an unfavourable conservation status today, this means that we have not managed to ensure the current model of SFM effectively guarantees the protection of forests, its biodiversity and its services.

6. The role of forests in a social context remains poorly assessed

In many urbanised regions of the EU, the role of forests has changed since the EU Forestry Strategy was first developed. Around 73 per cent of the European population now resides in cities and it is predicted that by 2050 the proportion of the European population living in urban areas will reach 84 per cent.¹⁸ Consequently, urban needs from forests as well as the values, norms, and opinions we hold about them assume an increased role in the debate about forest use in the EU.

Notwithstanding the growing importance of UPF, there are still numerous gaps in the current evidence base relating to the benefits that UPF can provide to society.¹⁹ There are also challenges such as the lack of comprehensive policies for UPF, the often weak information base for planning and management, growing conflicts over UPF and their use, and rapidly changing urban demands.²⁰ A workshop on UPF organised in January 2011 in Brussels suggested that the development of a European-wide strategy for UPF should be explored.²¹

3. Principles of a new Forest Strategy

The new Forest Strategy should focus on forests, and not solely on forestry. It must also guarantee a much more balanced approach towards the different forest functions than the previous strategy. In order to achieve this, decision-making about forest use has to open up. This has proven to be a challenge for forestry departments in several EU countries. They continue to struggle to adopt and implement truly participatory processes that allow for genuine input and where the outcomes actually reflect the diverse input received rather than prioritise timber production over other forest uses, irrespective of input received.

In this chapter, a series of elements are listed which should be part of the future strategy.

3.1. The process should include identification and active engagement of all stakeholders

When the previous Forestry Strategy was announced, it was strongly criticised by environmental NGOs for both lack of transparency and openness in developing the document as well as its bias towards forestry as opposed to forests. The strategy had been developed without consultation or participation of environmental or social NGOs.²²

¹⁷ EEA (2010). EU 2010 biodiversity baseline. EEA Technical report, n° 12:2010. www.eea.europa.eu/publications/eu-2010-biodiversity-baseline/

¹⁸ Stewart, A.; Bell, S.; Sanesi, G.; De Vreese, R.; Arnberger, A. (2011). The societal benefits of (peri-)urban forestry in Europe. Briefing paper 2. Workshop on sharing experiences on urban and peri-urban forestry, 28 January 2011, Brussels.

¹⁹ Stewart, A.; Bell, S.; Sanesi, G.; De Vreese, R.; Arnberger, A. (2011). The societal benefits of (peri-)urban forestry in Europe. Briefing paper 2. Workshop on sharing experiences on urban and peri-urban forestry, 28 January 2011, Brussels.

²⁰ Lawrence, A.; Johnston, M.; Konijnendijk, C.C.; De Vreese, R. (2011). The governance of (peri-)urban forestry in Europe. Briefing paper 3. Workshop on sharing experiences on urban and peri-urban forestry, 28 January 2011, Brussels.

²¹ http://ec.europa.eu/agriculture/fore/events/28-01-2011/report_en.pdf

²² FERN/TRN Briefing note. The Forestry Strategy. September 2004.

One of the recommendations of the mid-term evaluation of the FAP is to make the EU FAP more known, as awareness of the FAP and its outputs needs to be improved.²³ However, the means proposed in the mid-term evaluation are too limited (e.g. presentations on the FAP and FAP outcomes at seminars, workshops or conferences). More active consultation and participation of forest stakeholders needs to be carried out in the development and implementation of the future strategy. As the implementation of the strategy will mostly be done at the national level, involvement and active engagement of stakeholders in the development and implementation of the strategy should not only happen at the EU, but also at the national level.

3.2. The overarching principles should be clearly defined and focus on forest protection and resource efficiency

The overarching principles (multifunctionality and SFM) of the current Forestry Strategy are not well enough defined and it is clear from practice that they have not been the right framework to guarantee a balance of the different forest functions. These concepts will definitely not be strong enough to deal with the upcoming potential conflicts described above. The new Forest Strategy should build strong linkages with and reinforce the Green Paper on Forest Protection and Information in the EU and the EU Flagship Initiative on Resource Efficiency, with a key focus on reducing demand rather than securing access to resources and further expanding the EU's footprint in third countries.

Considering the increasing demands for timber and the potential conflicts of interest there is an urgent need for a discussion at EU level about what can forests in the EU sustainably supply, which demands can be met and which choices have to be made. The discussion should not focus on demand or more, but on "sustainable supply" and "better". The EU Flagship Initiative on Resource Efficiency sets out a framework to help ensure that long-term strategies in areas including energy, climate change and environmental policies produce results on resource efficiency. By linking up with the Resource Efficiency initiative the new Forest Strategy should set out the path for a discussion what policy initiatives are needed to ensure that the current conflicting demands would effectively be dealt with and resolved.

An additional overarching principle should be reflection of the role of forests in urban areas given that much of the forest in the EU is in urban areas. For a significant part of the population in the EU, these forests in urban areas are the only possibility for direct experience of 'nature'. Health, education and conflict resolution are key demands on forests in these areas in addition to traditional recreational use.

3.3. The instruments

3.3.1. A new Forest Action Plan with clear performance targets is required

Without an action plan, the future Forest Strategy will have no teeth. However, the previous EU FAP proved itself to not be a plan for real action as there were no performance indicators or timelines linked to the actions included and for some of the actions, stakeholders questioned the effect of the EU FAP on the ground.

In order to be more effective, the Action Plan needs to take into account:

- meaningful participatory involvement of stakeholders representing the full range of interests in forest use in its development and implementation at the EU and national levels
- that the action plan should be endorsed by the actors involved in its development and linked to a strategy that makes clear priorities. It should not be a wish list from all stakeholders as this would not make for a coherent document; actions proposed should

²³ Pelli, P. et al (2009). Mid-term evaluation of the implementation of the EU Forest Action Plan. A study for DG Agriculture and Rural Development (AGRI-2008-EVAL-07)

have a clear connection to key issues identified in the strategy and should outline how they help address the re-balancing of different forest functions so that true multifunctionality becomes a reality and not only a concept on paper

- that actions shall be performance based and include timelines - actions should also go beyond reports and workshops

With an increasing amount of EU and Member States policies that impact on forests, the lack of coherence is bound to increase. While the previous action plan focussed more on putting in place a structure that would enhance communication and coordination between policy makers involved, it did not propose strong instruments that could help in increasing coherence between (1) different forest related policies at EU level; (2) EU and national policy and (3) action plans at the Member State level. A future action plan should ensure that there will be proper coordination. None the less, all individual policies should have clear guidelines about how to ensure they strengthen rather than contradict each other (e.g. how can Rural Development Policy enforce environmental commitments?)

3.3.2. National Forest Programmes should be assessed as part of the discussion on the future Forest Strategy as they are likely to be a key instrument for implementation

If NFPs will be identified by the Forest Strategy as one of the elements through which international commitments, principles of SFM and recommendations should be implemented, this can only be done on the condition that these instruments are able to deliver what they have been designed for.

There is no commonly agreed definition of an NFP, but a common approach has been developed in the context of Forest Europe: “...a national forest programme constitutes a participatory, holistic, inter-sectoral and iterative process of policy planning, implementation, monitoring and evaluation at the national or sub-national level in order to proceed towards the further improvement of sustainable forest management and to contribute to sustainable development.”²⁴

So parallel to the discussions on the new Forest Strategy, there is need for a full analysis of the NFPs, taking into account the following issues:

- the legal status of the NFPs
- the design of the instrument
- the involvement and participation of stakeholders in development and implementation of the NFPs
- the instruments or processes for implementation, evaluation and monitoring of NFPs
- the impact of the NFPs on forest policy development and implementation at national level
- the contribution of the NFPs in the further improvement of SFM and how that is assessed
- the cohesion between the NFPs and other national plans.

To ensure shortcomings of NFPs are addressed in the development of the new Forest Strategy and are not repeated in the implementation of the forthcoming strategy at Member State level, best practise in NFP development and implementation should be compiled and analysed at the EU level. The harmonised use of such best practise should be encouraged across the EU.

3.3.3. Open Method of Coordination

²⁴ MCPFE. Vienna Resolution 1: Strengthen synergies for sustainable forest management in Europe through cross-sectoral cooperation and national forest programmes. Fourth Ministerial conference on the Protection of Forests in Europe. 28-30 April 2003, Vienna, Austria.

In the context of the Lisbon summit (2000) on the improvement of European economic performance and social cohesion, the Open Method of Coordination (OMC) was presented as a key policy instrument suited to promoting coordination among Member States in politically sensitive policy areas, most notably in the domain of social policy. Several OMC-type mechanisms have also emerged in the environmental field.²⁵

The OMC is a procedure for policy coordination based on common guidelines or objectives ('soft laws') intended to be translated into national policy, combined with procedures of periodic monitoring, evaluation and peer review, all in a cyclical process repeated annually. It is an intergovernmental cooperation procedure in that it leaves the decision-making capacities on national policy to the Member States, but incorporates supranational elements, such as a role for the Commission as an initiator. Devices such as comparisons and evaluations, benchmarking and peer pressure are expected to foster a voluntary upward convergence of Member State policies. The system of governance builds on a systematic exchange of information and on dialogue, which, ideally, will allow for coordination where all parties strive towards the same objective.²⁶

The OMC was mentioned in the previous EU FAP (in relation to Key Action 15 - Apply the OMC to National Forest Programmes), but so far there is no experience with the OMC in the forest sector.²⁷ Although from a forest protection perspective, the study conducted by Winkel et al²⁸ provides some useful insights into how different stakeholders see the OMC as a policy option for forest protection against harmful impacts.

For many participants in the EU governance debate, the acid test of the OMC's value in enhancing the EU's problem-solving capabilities is whether it can deliver measurable performance improvements in relation to agreed objectives and metrics.²⁹

So it is very important to learn from other policy areas where the OMC has been applied. Actual OMC processes as they have evolved since Lisbon vary considerably in their modalities and procedures, depending on the specific characteristics of the policy field in question, the basis of EU competence, and the willingness of the Member States to take joint action. Among the criticisms of the OMC is its alleged lack of substantive impact on Member States. According to this view, the OMC in its present form amounts to little more than the European emperor's newest clothes, an exercise in symbolic politics where national governments repackage existing policies to demonstrate their apparent compliance with EU objectives.³⁰

Even though some claim that OMC processes in employment and social inclusion have produced genuine impacts and achievements at both EU and Member State levels, there have also been shortcomings in the process. These shortcomings flow in large measure from procedural limitations: lack of transparency, barriers to broad participation, weak integration into domestic policymaking, insufficient emphasis on mutual learning, etc. Hence a potentially fruitful strategy for improving the operation of existing OMC processes would be to apply the key elements of

²⁵ <http://ecologic.eu/2153>

²⁶ Jacobsson, K.; Vifell, A. (2003). *Integration by Deliberation? On the role of committees in the Open Method of Coordination*.

http://www.sv.uio.no/arena/english/research/projects/cidel/old/Workshop_Firenze/contJacobsson.pdf

²⁷ Some would argue that there is some experience on learning processes due to the set-up and operation of efforts within the MCPFE, NFPs and the EU FAP. But all these learning processes have been criticized and are therefore not considered as examples in this paper of the OMC

²⁸ Winkel, G. ; Kaphengst, T.; Herbert, S.; Robaey, Z.; Rosenkranz, L.; Sotirov, M. (2009). *EU policy options for the protection of European forests against harmful impacts. Final report*.

²⁹ Zeitlin, J. (2005). *The Open Method of Coordination in Action: theoretical promise, empirical realities, reform strategy*. In Zeitlin, J. & Pochet, P. (2005). *The Open Method of Coordination in Action: the European Employment and Social Inclusion Strategies*. http://www.sps.ed.ac.uk/__data/assets/pdf_file/0017/10169/Zeitlin_05_OMC.pdf

³⁰ Zeitlin, J. (2005). *Introduction: the Open Method of Coordination in Question*. In Zeitlin, J. & Pochet, P. (2005). *The Open Method of Coordination in Action: the European Employment and Social Inclusion Strategies*. <http://eucenter.wisc.edu/OMC/Papers/EUC/JZPP/introduction.pdf>

the method to their own procedures: benchmarking, peer review, monitoring, evaluation, and iterative redesign.³¹

If and whether the OMC would apply to the Forest Strategy and the development and effective implementation of NFPs would first and foremost depend on the willingness of Member States to develop such a process. Without such willingness not much can be expected to be achieved.

³¹ Zeitlin, J. (2005). The Open Method of Coordination in Action: theoretical promise, empirical realities, reform strategy. In Zeitlin, J. & Pochet, P. (2005). The Open Method of Coordination in Action: the European Employment and Social Inclusion Strategies.http://www.sps.ed.ac.uk/__data/assets/pdf_file/0017/10169/Zeitlin_05_OMC.pdf