

The Case of the Czech Republic

Funding forests into the future?

How the European Fund for Rural Development affects Europe's forests



Zdenek Postulka

Hnutí DUHA (Friends of the Earth Czech Republic)



A report produced by FERN, March 2008



Hnutí DUHA
Friends of the Earth Czech Republic



www.hnutiduha.cz



www.fern.org

This paper was funded by the European Community, Directorate-General for Agriculture and Rural Development and the Dutch Ministry of Environment and Spatial Planning.

The views expressed, the information presented, and the geographical and geopolitical designations used in this product do not imply the expression of any opinion whatsoever on the part of any of the donors. Neither do they necessarily represent FERN's position.

This paper is part of a series of six country reports that includes Bulgaria, Czech Republic, Finland, Hungary, Portugal and Romania. All are available at www.fern.org

Cover: Breznik, Sumava, Czech Republic, photo Vigor, flickr.com

March 2008

Contents

Acronyms	4
1 Introduction	5
1.2 Nature protection	5
1.3 Ownership	7
1.4 Forest management	7
1.5 Annual allowable cut	7
1.6 Tree diseases and pollution	7
1.7 Legislation	7
1.8 Czech forests and the RDP	7
2 Forest measures in the Rural Development Programme	9
2.1 Details of measures	10
2.1.1 Forest investments (measure I.1.2)	10
2.1.2 Afforestation of agricultural land (measure II.2.1)	10
2.1.3 Training, education and human potential development (measure I.3)	10
2.1.4 Natura 2000 forestry payments (measure II.2.2)	10
2.1.5 Forest environmental payments (measure II.2.3)	10
2.1.6 Restoring forestry potential after calamities, supporting social functions of forests (measure II.2.4)	11
3 The Rural Development Programme, and the aims of the National Forestry Programme and the National Strategy for Biological Diversity	12
3.1 Working towards a near-natural composition of tree species in forests	13
3.2 Natural regeneration of forest stands	14
3.3 Clearcutting	15
3.4 Leaving dead trees	15
3.5 New forest categorisation	16
4 The RDP and EU objectives for biodiversity	17
4.1 Funding for Natura 2000 and biodiversity	17
4.1.1 Natura 2000 payments in forests (RDP measure II.2.2, based on EAFRD Art. 46)	17
4.1.2 Forest-environment payments (RDP measure II.2.3, EAFRD Art. 47)	17
4.2 Prepared measures with high importance for forest biodiversity	18
4.2.1 Payments linked to Directive 2000/60 (RDP measure II.1.2, EAFRD Art. 38)	18
4.3 Missing biodiversity safeguards	18
4.4 First afforestation of agricultural land	18

4.5	Forest investments	20
4.5.1	Water drainage in forests (RDP measure I.1.2, EAFRD Arts 27 and 30)	20
4.5.2	Restoring forestry potential after natural disasters and introducing preventive measures (RDP measure II.2.4.1, EAFRD Art. 36 b vii)	20
4.5.3	Utilisation of branches and other logging residues as energy biomass (RDP measure I.1.2.1, EAFRD Art. 28)	20
4.5.4	Insecticide use in forests (RDP measure II.2.4.1, EAFRD Art. 48)	21
4.5.5	Construction of new forest roads (RDP measure I.1.2, EAFRD Art. 30)	21
5	Partnership in the RDP preparatory process	22
5.1	Monitoring committees	23
5.2	National rural development strategy consultation	23
	References	24
	Contact	25

Acronyms

CAP	Common Agricultural Policy
EAFRD	European Agricultural Fund for Rural Development
EAGGF	European Guidance and Guarantee Fund
EC	European Community
EU	European Union
FoE Cz	Friends of the Earth of the Czech Republic
IPA	Important Plant Areas
MoA	Ministry of Environment of the Czech Republic
MoE	Ministry of Agriculture of the Czech Republic
NFP	National Forestry Programme
NSBD	National Strategy for Biological Diversity
NSC	Natural Species Composition
RDP	Rural Development Programme of the Czech Republic
SEA	Strategic Environmental Assessment
WFD	Water Framework Directive (2000/60 EC)

1 Introduction

The forests of the Czech Republic have undergone dramatic changes over the past two hundred years. The natural forest ecosystems have largely been replaced by unstable spruce and pine monocultures, which can hardly play the crucial environmental and social roles that natural or semi-natural forest ecosystems have traditionally played in maintaining the quality of the countryside, and more broadly society in general. These monocultures have led to a dramatic decline in the country's biodiversity. Furthermore, according to scientists, the critical situation of the forest stands in the Czech Republic was one of the main causes of the dramatic floods that affected the country in 1999 and 2002. Forestry management in the majority of the forests in the Czech Republic remains poor and does not reflect the urgent need for change; nor has it embraced more environmentally friendly modern methods.

The overall acreage of the forests in the Czech Republic, as of 31 December 2000, was 2,637,130 hectares (ha). Forests cover 33.44 per cent of the land, and this percentage has been rising steadily for the last 250 years. Forests are fairly evenly distributed throughout the country; the percentage of forested land in the nation's various administrative units varies very little, with none of them having less than 27.1 per cent, and none of them having more than 42.8 per cent. The amount of forest per inhabitant of the Czech Republic is 0.25 ha.

The Czech Forest Act No. 289/1995 distinguishes between three categories of forests:

- 1 'Commercial forests', which occupy 76.7 per cent of the overall forest territory
- 2 'Protective forests', i.e. forests maintained in areas with extremely negative abiotic conditions and in areas bordering the timberline (in order to prevent such eventualities as erosion, avalanches and landslides), and which occupy 3.5 per cent of the overall forest territory
- 3 'Special-purpose forests', which occupy the remaining 19.8 per cent. Forests are classified as 'special-purpose' when they are in National Parks or National Nature Reserves (the highest degree of 'specially protected areas' defined within Czech law), as well as when they are needed to preserve biodiversity.

1.2 Nature protection

The overall acreage of forests in specially protected areas, as mentioned in Act No. 114/1992 dealing with nature protection and landscape preservation, is 715,600 ha, or 27.2 per cent of the total forest acreage. In our country's largest specially protected areas (four National Parks and twenty-four Protected Landscape Areas), there are 658,380 ha of forest; another 57,230 ha are in small-scale specially protected areas (in the legally defined categories translatable as 'National Nature Reserve', 'Nature Reserve', 'National Natural Monument' and 'Natural Monument').

Many types of organism can exist only in certain types of forest ecosystems. Some of them are, under Directive No. 395/1992 of the MoE, considered 'Specially Protected Species', and are classified as either (1) critically endangered, (2) strongly endangered, or (3) endangered species. For example, twenty-five (27.5 per cent) of the invertebrate taxa (genera, species, and subspecies) listed in this directive appear exclusively in forests. Among vertebrates, there are four types of reptiles bound with forest ecosystems (out of a total of ten domestic specially protected reptile species), thirty bird species (of 124 specially protected species), and thirteen mammalian species (of thirty specially protected species).

The current instability and the relatively low biodiversity of forest ecosystems in the Czech Republic has been caused mainly by changes in the species and spatial composition of forests through the replacement of the original, primarily broadleaved forest with coniferous monocultures within the

forest-management system, which came about as a result of the increased consumption of wood during the industrial revolution of the 18th and 19th centuries. Another cause has been the significant amount of damage to forests (both their trees and their soil) from the energy sector and industry, which reached a peak in the second half of the 20th century. In the last thirty years, the abnormally high game populations have led to an equally serious destabilisation of the forest ecosystems. From the standpoint of the biodiversity of entire forest ecosystems (including decomposers, invertebrates, and herb synusia), the most serious negative influence is clearcut-based forest management in which, during part of the production cycle, changes in abiotic conditions occur that are so severe as to threaten the existence of organisms which rely on the forest environment for their survival.

From the standpoint of biodiversity, the unfavourable species composition in Czech forests at present is the result of the long-term effects of intensive forest management aimed at maximum wood production. Fortunately, in the last fifty years, we have seen a gradual improvement in the share of the broadleaved species that had previously been almost eliminated, from 12.9 per cent in 1950 to 22.3 per cent in 2000.

Even though the proportion of broadleaved trees nearly doubled in this period, this has to be seen in its broader context, since in the forests' natural species composition, the proportion of broadleaved trees was 65.3 per cent. From the 18th century, when there was a critical lack of timber, the mainly deciduous and mixed forests were replaced with coniferous monocultures. The Norway spruce (*Picea abies*) previously had an 11.2 per cent share in the natural composition of Czech forests, but its current representation is 54.1 per cent; a similar rise occurred in the case of the Scots pine (*Pinus sylvestris*), which had only a 3.4 per cent share in the species composition, but now has a 16.8 per cent share. The share of the common beech (*Fagus sylvatica*), on the other hand, has dropped dramatically, from its natural state of 40.2 per cent to a mere 6.0 per cent today. These long-term changes have resulted in low biodiversity and poor ecological stability of the present forest stands, and this in turn has led to the widespread devastation of forests by a range of factors, both biotic (bark beetles in particular) and abiotic (especially wind, emissions, and drought). In the individual years 1990 to 2000, the proportion of salvage cuttings caused by the above-mentioned factors ranged from 15 per cent to 60 per cent of the logging in the Czech Republic overall.

Table 1 – Tree species in the forests of the Czech Republic

Species	Proportion (per cent)
Spruce	54.1
Fir	0.9
Pine	16.8
Larch	3.8
Other coniferous species	0.2
Oak	6.4
Beech	6.0
Birch	2.9
Other broadleaved species	7.1

From the standpoint of forest biodiversity, the long-term high populations of ungulates, including introduced ungulate species, are another very significant negative factor. Damage caused by animals browsing and peeling bark from trees significantly affects the structure of species, age of the trees, and space within forest stands. The resulting strong selection pressure makes natural regeneration difficult or – in certain sites – impossible, and can make it hard to renew the forests even artificially.

Forest certification, however, can play an important role in encouraging increased biodiversity, and it is hoped that this will become increasingly important in the Czech Republic.

1.3 Ownership

As of 31 December 2000, the ownership structure of Czech forests was as follows: 63.1 per cent of the total area of the forests was state-owned, 13.6 per cent was municipality-owned, 0.9 per cent was owned by forest cooperatives, 0.3 per cent was owned by universities, and 22.1 per cent was in private hands. The ownership relationships have not stabilised since the overthrow of the Communist regime, and a slight drop in the share of state ownership can still be expected, especially as a result of the restitution of Church-owned forests (approximately 6.5 per cent of the overall forest acreage in the Czech Republic) that the Government is still postponing.

1.4 Forest management

The prevalent method of harvesting is clearcutting, although selective cutting methods are definitely more suitable for the natural conditions of the Czech Republic.

1.5 Annual allowable cut

The growing stock volume in the forests of the Czech Republic is 640 mil m³. The total annual increment is 16.8 mil m³. In 2002 the total annual cut was 14.65 mil m³, of which 2.59 mil m³ was from salvage fellings, caused especially by damage from wind, insects and air pollution.

1.6 Tree diseases and pollution

One third of the trees in the Czech forests have been damaged by air pollution. The defoliation rate is the second highest in Europe (after the Ukraine), and spruce monocultures are heavily affected by air pollution (especially from SO₂ and NO_x). Infestations of pests (especially bark beetles) are common in coniferous stands. With regard to air pollution and acid rain, the situation was at its worst in the 1980s, when forests died in their tens of thousands of hectares, especially in the mountains. Even following the decrease in air pollution from the 1990s, the situation remains critical in some mountain areas.

1.7 Legislation

The MoA is the authority responsible for overseeing forest management. Only within national parks is it directly the domain of the MoE, and forests in military areas fall within the remit of the Ministry of Defence. State-level administration of forests (i.e. management measures) is entirely the responsibility of the MoA. The National State-Supervision body and the Czech Environmental Inspection Agency are responsible only for inspection; and both of these institutions are subordinate to the MoE.

The main legal norms concerning biodiversity in forests are:

1. The Forest Act No. 289/1995
2. The Nature Protection and Landscape Preservation Act No.114/1992
3. The Game Management Act No. 449/2001
4. Government directives and regulations regarding the execution of these laws.

1.8 Czech forests and the RDP

The European Commission approved the Czech Government's Rural Development Programme (RDP). The Czech RDP sets the rules for spending money from the European Agricultural Fund for Rural Development (EAFRD) – the so-called second pillar of the Common Agricultural Policy – in 2007–2013. With the budgeted € 31.96 million of annual funding from public sources for forestry measures (training, education and WFD-linked payments are not included), the Programme will have a major impact on forests and forestry in the Czech Republic, both directly (through investments and subsidies) and

indirectly (through providing motivation and priorities for forest owners).

The Czech Republic's branch of Friends of the Earth (FoE Cz) is seriously concerned about the forestry measures in the RDP. Unless there are major changes, the forestry subsidies will fail to bring added value to forest management in the Czech Republic, and will undermine both the EAFRD's own goals and those of key European and national strategies, e.g. the EU's Sustainable Development Strategy and the Czech Republic's National Forestry Programme. These concerns were not properly dealt with at the national level because of the Government's failure to implement the partnership principle properly, as spelled out by the Article 6 of the EAFRD regulation.

Forestry is one of the key land uses in the Czech countryside. Some 33 per cent of the country is covered by forests: one of the highest rates in the EU. The long-term economic future of hundreds of rural communities depends on the well-being and sustainable management of the forests. Forestry is also critically important for the biological diversity of the country. A recent assessment of Important Plant Areas in central and eastern European countries found that 'poor forestry practices threaten 44 per cent of IPAs in the region' (Plantlife International, 2005). The health of the forests in the Czech Republic, as measured by defoliation, has deteriorated over the last few years. In 2001, the Czech Republic had the highest defoliation rate of all European countries (MCPFE, 2003). Improving the vitality of the forests is now the key priority for Czech forestry. Neither the economic function (i.e. timber production) nor the environmental function of the forests can be fulfilled in the longer term without substantial changes in forestry practices.

In a May 2006, a group of more than 280 Czech scientists said that 'the poor condition of forests – forest dieback, decreased resistance to pests and weather extremes, increased frequency of disturbances, biodiversity loss, reduced water retention capacity, soil erosion – is due to a number of factors. Most of them are connected with forest management. Czech forestry insists on traditional, even-aged forest management.' (Scientist and expert statement, 2006.)

Changing forestry practices will be important for achieving both the EU Sustainable Development Strategy's agreed goal of halting biodiversity loss by 2010, and the economic and social development of the Czech Republic's rural areas. In order to achieve this, the Czech Government and the European Commission need to ensure that the available policy tools are utilised and coordinated effectively. FoE Cz believes that at least 10 per cent of forest land in the Czech Republic should be reserved for biodiversity conservation in the longer term, i.e. that one tenth of the country's forests should be gradually converted to natural habitats with no forestry exploitation. Research suggests that this target is the minimum level necessary for restoring the diversity of forest species (Hanski and Walsh 2004).

The vast majority of the Czech Republic's forests are and will continue to be concerned with wood production, rather than with the protection of biodiversity. However, current forestry practice is unsustainable even for commercial forestry. The degradation of forest soils damages long-term timber production, and artificial monocultures of conifers are unable to withstand extreme weather and threats from fungi and insects.

Changes in forestry practice will also be necessary to ensure some minimum standards of biodiversity protection in commercial forests. This is in accordance with the approach of the Common Agricultural Policy in general and the EAFRD in particular, which emphasises sustainability and biodiversity protection in the wider landscape, outside protected areas.

2 Forest measures in the Rural Development Programme

This section deals with the question of how much money from the rural development fund is being used to finance forest-related activities.

Table 2 – Basic division of RDP support

	Public contribution (EU+national)	Private contribution	Total	Percentage
Commercial subsidies	€ 85,144,929	€ 85,144,929	€ 170,289,858	58.12
Environmental subsidies	€ 127,824,227	€ 0	€ 127,824,227	41.88
Training/Education	€ 10,758,688	€ 3,037,554	€ 13,796,242	+++

+++Agricultural and forestry training/education combined.

Table 3 – Concrete measures (in Euros)

Number of the measure	EAFRDE	Measure	Public contribution (EU and national)	Private contribution	Total per measure
RDP	Art.				
I.2.1	20 b (ii) (iii) (iv) (v), 27,28,29,30	Investments in forests	85,144,929	85,144,929	170,289,858
I.3.1	20 a (i)	Training, education	4,174,595	1,391,531.67	5,566,126.67
I.3.4	24, 25	Advisory services	6,584,093	1,646,023.33	8,230,116
Total axis I.			95,903,617	88,182,484	184,086,100.67
II.2.1.	36 b (i)	Afforestation of agricultural land	69,157,181	0	0
II.2.1.1.	36 b (i)	Firstfforestation of agricultural land	69,157,181	0	69,157,181
II.2.2.	36 b (iv)	Natura 2000 forest payments	12,238,490	0	12,238,490
II.2.3.	36 b (v)	Forest-environmental payments	15,735,201	0	15,735,201
II.2.4.	36 b (vi) (vii)	Restoring forestry potential and introducing preventive measures	30,693,356	0	30,693,356
II.2.4.1.	36 b (vi)	Restoring forestry potential and introducing preventive measures	27,973,691	0	27,973,691
II.2.4.2.	36 b (vii)	Non productive investments in forests	2,719,664	0	2,719,664
Total axis II.			227,674,764	0	227,674,764
Total axis I. and II.			223,727,844	88,182,484	311,910,328
Total RDP			3,615,803,370	986,589,665	4,602,393,036
Forestry measures in RDP (%)			6.18%	8.93%	6.77%

2.1 Details of measures

2.1.1 Forest investments (measure I.1.2)

This measure is based on Articles 20 b (ii–v) and 27–30 of the EAFRD regulation, and is divided into three areas:

1. **Forestry mechanisation** (based on Art. 20 b ii–v of the EAFRD regulation) covers the purchase of machinery and other equipment for the building and maintenance of forest roads and pathways, construction of drainage systems, regulation of streams and rivers, construction of retention dams and ponds, forest regeneration (i.e. logging and planting trees) and for the 'environmentally sound' processing of timber.
2. **Technical equipment for businesses** (based on Arts 28 and 29 of the EAFRD regulation) covers the purchase and modernisation of technologies for processing and utilisation of logging waste for energy and other purposes.
3. **Forestry infrastructure** (based on Arts 20 b v and 30 of the EAFRD regulation) concerns the building of roads, reconstruction and repair of roads, building, reconstruction and general repair of drainage systems in forests, building, reconstruction and general repair of other infrastructure facilities.

2.1.2 Afforestation of agricultural land (measure II.2.1)

The measure is based on Article 36 b (i) and supports first afforestation of agricultural land. RDP's objective is to provide for afforestation of 12,600 hectares of land in the period 2007–2013.

2.1.3 Training, education and human potential development (measure I.3)

This measure, based on Articles 20 a (iv, v), 24 and 25, is primarily focused on farmers. However, individual submeasures include some activities aimed at forest owners. Forestry-related activities do not have specific budget lines and are included in the general budgets of individual submeasures. The measure includes:

1. **Special education and information services**, i.e. educational and training projects concerning particular measures of the EAFRD and aims of CAP, including forest and forest-environmental management.
2. **Advisory services**. This is intended to give support to farmers, forest owners and forest managers. They can pay for consultants and advisory services in the area of current legislation. Among the available support there is advice on forest-environmental measures and forestry legislation, forestry certification systems etc.

2.1.4 Natura 2000 forestry payments (measure II.2.2)

Preservation of valuable forest areas. This submeasure is based on Article 36 b (iv) of the EAFRD regulation, and deals with payments for conservation of natural forests protected by EU legislation. The forest owner or manager will agree to leave the property more or less untouched, under a non-intervention regime, for at least twenty years. This submeasure aims to cover 37,000 hectares.

2.1.5 Forest environmental payments (measure II.2.3)

Improving species composition of forest stands. This submeasure is based on Article 36 b (v) of the EAFRD regulation, and deals with payments for increased planting of local tree species mix, i.e. especially broadleaved species and fir. This submeasure aims to cover 40,000 ha.

2.1.6 Restoring forestry potential after calamities, supporting social functions of forests (measure II.2.4)

1. **Restoring forestry potential and introducing preventive measures.** This submeasure is based on Article 36 b (vi) of the EAFRD regulation. Support is provided for protective and preventive measures and to decrease the damage caused by disasters in forests. There is further support for extraordinary measures during calamities caused by pest outbreaks, mushroom diseases and by fire, wind, heavy snow and other disasters; and support for reconstruction of forest stands, regeneration of forest after savage logging (both artificial and natural), construction of flood prevention measures on small forest streams and in their catchments, and erosion prevention and control. The reconstruction of forest stream regulations and forest roads damaged by floods, and the restoration of soil damaged by erosion, liming and the fertilisation of forests are also included.
2. **Non-productive investments in forests.** This submeasure is based on Article 36 b (vii) of the EAFRD regulation, and covers grants for projects for forest tourism: the construction of forest roads, pathways, bridges, parking places, information boards etc.

3 The Rural Development Programme, and the aims of the National Forestry Programme and the National Strategy for Biological Diversity

The National Rural Development Strategy was produced more or less in parallel with the RDP, and the real decisions were made during the RDP debate. The strategy does include some strategic information (such as the division of EAFRD funds into RDP axes), but this was simply taken over from the RDP debate and included in the strategy. That is why we will evaluate the RDP in the text below. The national biodiversity action plan has not been developed yet, and we are working with the National Strategy for Biological Diversity (NSBD).

EAFRD funding gave an enormous opportunity to motivate forest owners to support the goals of the Government's key forestry-related policies, especially the Czech Republic's NFP and NSBD. Unfortunately, the Government missed this opportunity. This chapter looks in detail at key biodiversity and forest health-related aspects of the two policies, and their reflection in the RDP.

Friends of the Earth suggested that six minimum standards (project eligibility criteria) should be included in all relevant RDP forestry measures (I.1.2, II.2.4.1, II.2.4.2):

1. The owner avoids clearcut logging (two possible definitions: clearcut logging of areas where any one dimension exceeds the height of the highest tree in the logged stand, or any clearcuts larger than 0.3 ha).
2. Only tree species native to the relevant habitat type are used in planting or seeding, and in the appropriate mutual ratio/mix.
3. Thinning supports the gradual reconstruction of the native tree species mix (so that thinning does not target broadleaved trees in order to remove them from the forest several years after planting – a practice used by some forest owners to bypass the current minimum broadleaved species standard).
4. Planting of fir and beech in clearcuts is avoided without previous use of pioneer tree species (rowan, birch, poplar) as shelter to ensure succession-like conditions.
5. Natural regeneration is preferred wherever possible.
6. At least five trees per hectare are left unlogged, to allow natural aging and decay. This standard was explicitly proposed by the SEA of the RDP, and it was included in one version of the RDP, but subsequently removed under pressure from potential subsidy recipients.

The minimum standards should be included in any relevant RDP forestry subsidies – whether the forest owner applies for funding for harvesting technology, tree planting, infrastructure, forest regeneration after a windbreak, or anything else. The only exemption should be afforestation, where the subsidy should be explicitly restricted to projects which have appropriate species anyway (see below), and where the other proposed requirements (avoidance of clearcuts) do not make sense (the subsidy target group are farmers, not forest owners). Also, they are not necessary in the Natura 2000 Forests Payments measure, as strong environmental standards will be ensured by the Natura 2000 site management plans here.

Potential concerns about the readiness of forest owners to change their practices fast enough to be eligible for subsidies could be resolved by a delay in the applicability of these standards. Instead of practising them at the time of application, the owners can be required to commit themselves in the subsidy contract to change the practice before, say, 2014.

These minimum standards are necessary to ensure that the goals of the EAFRD, EU Sustainable Development Strategy, NSBD and NFP are supported throughout the RDP. Also, they provide for effective synergies between Axis 2 goals and measures in other axes, and between measures within Axis 2. They will ensure that minimum standards of sustainable forest management are met, and that the stability of forest ecosystems increases. The direct relevance of the proposed standards to the NFP goals and priorities is discussed below.

3.1 Working towards a near-natural composition of tree species in forests

The National Forestry Programme calls for a 'gradual conversion of the present species composition using available tools of forest policy in favour of tree species that are characterised by higher tolerance to harmful factors, ameliorating effects on the soil and that provide high wood-producing and non-wood producing functional effects' (p. 4).

The renewal of the natural species mix is another of the NSBD's main objectives: 'In the renewal of forest stands, ensure that the proportion of tree species belonging to the natural species composition (NSC), in economic forests, is at least within the limits of the current statutory percentage for ameliorating and compacting tree species and, by suitable instruments, promote the use of NSC species over and above the minimum framework.

It is easy to understand why this is so important. Most of the forests in the Czech Republic are conifer monocultures. The natural ratio of Norway spruce in Czech forests would be 11 per cent. Beech, oak and fir should be the most common species. However, the current ratio of spruce is 53 per cent. Despite some positive developments, progress towards a better species mix has been very slow. The ratio of broadleaved species has increased only by 3 per cent since 1970. In fact current forest practices continue to reinforce this situation: about 45 per cent of trees planted in 2004 were spruce, more than all broadleaved species combined (Ministry of Agriculture 2005). The proportion of broadleaved species in artificial forest regeneration in 2006 was 36 per cent.

According to a Czech scientists' statement on forest policy, 'Monoculture-like stands are ecologically less stable. This is particularly true in the case of spruce. ... Unnatural spruce monocultures degrade the forest soil. ... The Government should, in the first place, eliminate any subsidies for planting tree species unsuitable for the specific habitat (of spruce at medium altitudes, for example).'

Table 4 – Natural species, compared with planted trees, in Czech forests (2004)

Species	Natural (per cent)	Planted (per cent)
Oak	19	10
European beech	40	18
Deciduous (total)	65	35
Norwegian spruce	11	45
Silver fir	20	5
European pine	3	12
Conifers (total)	35	65

Source: Ministry of Agriculture, 2005

The widespread conversion of broadleaved and mixed forests to conifer monocultures has led to a major loss of important habitats of thousands of plant and animal species. A number of once common species have virtually disappeared from most Czech forests, and survive only in small fragmented refuges.

Conifers damage forest soil, triggering further acidification. Research in the Krkonoše National Park revealed that broadleaved stands may reduce soil acidity by up to 1.3 pH (with an average of 0.7 pH) (Hruška and Cienciala 2001). By comparison, acid deposition in the Krkonoše Mountains – one of the most damaged mountain ranges in Europe – has led to acidification of about 1 pH (Podrázský et al.

2004). Field experiments in the Czech Republic have shown that a broadleaved trees plantation is able to undo acidification caused by 100 years of spruce monoculture within thirty years (Hruška and Cienciala 2001). Government modelling research shows that, in the near future (by 2030), 'forestry practices may become the dominant cause of soil degradation' in areas with poor soils (low content of basic elements), with an impact larger than that of acid deposition (Hruška and Cienciala 2001)).

Widespread planting of spruce – a mountain species – at relatively low elevations causes large-scale deterioration and diebacks of forests due to insect and fungi attacks, windstorms, drought and other weather events. Spruce is weak in warm weather with low precipitation, which means that stands are unstable, and unable to cope with environmental pressures such as fungi and weather. Forests with locally native tree species are more stable and resistant.

Conifer monocultures have been one of the key reasons for the negative trend of tree defoliation in the Czech Republic since the late 1990s. Large tracts of forests in some regions have died in recent years, despite a radical decrease in air pollution. Salvage logging is responsible for about 30 per cent of timber production in the country (54 per cent in the warm year of 2003) (see Ministry of Agriculture 2005).

In the RDP there are just two (underfunded) measures dedicated to the improvement of species diversity: forest environment payments (RDP measure II.2.3, EAFRD Art. 47) and Natura 2000 payments in forests (RDP measure II.2.2, based on EAFRD Art. 46) with an annual budget of just €4 million. If we consider it as the crucial measure, we can say that the RDP fails to guarantee the most important objectives, i.e. the sustainable management of forests and the EU goal of halting biological biodiversity loss by 2010.

Additionally – and perhaps more importantly – the RDP fails to require forest owners who receive subsidies to increase proportion of broadleaved (and natural in general) species in their regeneration.

3.2 Natural regeneration of forest stands

The National Forestry Programme claims that 'it is advisable to ... create legislative, silvicultural and economic preconditions for natural regeneration of genetically suitable forest stands in the conditions where it is effective from biological and economic aspects'. It also recommends that forest owners 'should support the growth of successive forest stands under shelterwood of regenerated stands and reduce the use of clearcutting system where it underlies sustainable management of forests' (p. 4), and calls for new subsidies 'supporting the application of natural regeneration of genetically suitable stands'.

One of the main objectives of the NSBD is to 'adopt measures to increase the proportion of natural renewal of forest stands that are suitable from the viewpoint of species and genetic aspects'.

Efforts to increase production, together with the increasing demand for easily processed timber from conifers, has led in the past to an alteration of the type composition of the great majority of forest vegetation. The present proportion of broadleaved species in the Czech Republic is 23 per cent, whereas in the natural state it would be approximately 65 per cent. The replacement of natural, structurally rich and species-diverse forests by cultures of the same age, frequently of a single timber species, as well as the failure to appreciate the importance of the provenance and genetic value of seed or planting material, has caused a drastic interference with the ecosystem. The blanket transition to clearance management, in particular large-scale clear-felling methods, has impoverished the diversity of the forests, including the total removal of aging trees and deadwood which numerous plant species, and especially forest fauna species, depend on.

But the phrase 'natural renewal' occurs in the text of the Czech RDP just once. The RDP vaguely claims to support natural forest renewal and regeneration within the framework of submeasure II.2.4.1 ('Restoring forestry potential and introducing preventive measures'). However, the measure is very broad and enables financing of liming and fertilisation, stream regulation and building of reservoirs, and measures on forest roads, together with artificial forest regeneration by spruce. Forest owners are given no incentive to favour natural regeneration over clearcuts and artificial planting.

3.3 Clearcutting

The Czech NSBD states that: 'The extensive transition to open, particularly extensive clearcutting accelerated the process of reduction in the forest species diversity, inter alia, by the entire elimination of the stages of aging and decomposition of stands on which numerous species of lower and higher plants and representatives of a number of taxonomic groups of animals are bound.'

The NFP's opposition to clearcutting has already been referred to above; and the NFP has called for new subsidies 'supporting the application of natural regeneration of genetically suitable stands'; i.e. the phasing out of clearcutting (p. 13).

Clearcutting, followed by replanting with new trees, is the most common type of harvesting/regeneration in the Czech Republic. About 15,000 ha of clearcuts are created in the country every year (Ministry of Agriculture, 2005). Almost 84 per cent of regeneration consists of planting or seeding. The law limits the maximum size of clearcuts to 1 ha (2 ha in flood plains and pine forests and on inaccessible mountain slopes).

This practice has been repeatedly criticised for its impact on soil degradation and the reduction of biodiversity. Soil life is damaged by radical, large-scale change of conditions (insolation, microclimate); increased insolation leads to mineralisation of organic matter, microclimate changes damage soil and clearcuts are prone to erosion.

Rapid change of habitat causes extinction of most forest species, and periodic clearcuts (every 105 years on average) prevent the full return of plants and soil biota in particular. In addition, the artificial replanting that follows clearcutting leads to the unified structure of even-aged forests with low biodiversity. The problems are reinforced by the usual practice of regeneration, which is to plant new trees directly on the clearcut, rather than using pioneer tree species as a transition stand, in the shelter of which the target species would be planted after roughly ten years in order to create succession-like conditions. Natural conditions are radically different in Central Europe; the average size of gaps created by fallen trees in natural beech forests in Slovakia is 250 m², and the gaps never exceed 0.4 ha (Drößler and von Lüpke 2005).

In May 2006, a scientific statement on the situation of the forests in the Czech Republic stated that 'the consequences of clearcutting are serious'. These consequences include soil damage, erosion and a radical impact on biodiversity, and the statement stated that 'trees planted in the clearing tend to be more vulnerable to pests and wind'. Because of this, 'legislation must significantly reduce or eliminate clearcutting. Small area shelterwood felling and selective harvesting methods should be preferred. At the same time, regulations should ensure that clear-cut areas which were created in the past (or which will emerge as a result of future salvage cuts) will be reforested with pioneer species'. A major report of government experts warned that 'loss of humus [due to clearcutting] ... may be large'; and recommended a substantial shift away from this practice and towards selective logging with natural regeneration.

Crucially, however, the RDP includes no efficient measures or standards to reduce clearcutting.

3.4 Leaving dead trees

The NSBD requires the provision of 'a certain proportion of aging and dead trees in forest stands as refuges for communities of organisms bound on such trees'. The National Forestry Programme, meanwhile, calls for 'leaving some trees (standing, particularly dead trees and exceptionally the fallen ones) as biotopes of birds, mammals, plants and microorganisms in the current standard methods of forest management' (p. 6).

The lack of deadwood and aging trees is one of the key health and biodiversity problems of Czech forestry. Research shows that there is about 50–230 m³/ha of deadwood in Czech natural forests (i.e.

in nature reserves with a long-term non-intervention regime) (data from the Forest and Management Institute). The range is generally between 100 m³ and 150 m³/ha (Vrška, T, et Hort, L, 2001). Since the data come from a wide range of sites, from lowland floodplain forests to mountain spruce forests, we can assume that these figures are largely indicative of the natural situation in Czech forests in general. However, a government inventory has shown that in reality there is only 7 m³ of deadwood in an average Czech forest (Forest and Management Institute, 2005). Trees are logged at an average age of 105 years.

Lack of deadwood leads to further acidification of forest soils and loss of nutrients. This is reinforced by the burning or removal of branches and other waste during logging, a common practice in Czech forestry. Leaving branches on site would reduce the loss of basic elements and nutrients (calcium and magnesium) by 40 per cent. Fallen trees would also enrich humus, helping to keep soil humid and prevent erosion.

Perhaps even more important is the biodiversity impact of deadwood removal. This is probably the most important biodiversity problem in Czech forestry. Old trees and deadwood are an important habitat for thousands of species of birds (including woodpeckers, owls and flycatchers), squirrels, bats and dormice, rare beetles and other insects, fungi, lichen, mosses and other flora and fauna. The WWF estimates that about one third of European forest fauna and flora depend on deadwood (Dudley and Vallauri 2004).

There is no provision in the RDP (as it stands now) to give direct financial support to forest owners for leaving standing or fallen trees. A subsidy for leaving some trees on the property unlogged will be introduced only from 2009, and this is heavily underfunded. More importantly, the RDP does not link subsidies to the requirement for leaving a certain percentage of deadwood, and does not create financial tools which could stimulate the owner to do so.

3.5 New forest categorisation

The NSBD's main objectives include the following aims: 'To enact alternative methods of drawing up forest management plans on the basis of operational inventories, as an instrument for encouraging the transition to environmentally sound management methods. At the same time, to elaborate and introduce to daily practice a new draft system of forest categorisation based on the concept of forests as poly-functional ecosystems, and introduce the required incentives so that the measures necessary for conservation of biodiversity are economically acceptable for forest owners.'

Another key aim is to 'apply principles of ecosystem access in the use of forest biodiversity components. Among other factors, this means devoting attention to the protection of the genetic resources of endangered species of lower and higher plants of individual populations of free-living fauna (zoocenoses), forest soil and its natural water regime, in which it is not possible to overlook other (e.g. socio-economic) aspects of the given problem.'

The current Czech classification of forests and forest management planning is outdated and does not meet the requirements for the regeneration and conservation of rare habitats, protection of forest soils and regeneration of the hydrological regime of forests.

One of the key solutions is to create sufficient financial tools for the designation of biodiversity and hydrologically sensitive areas, and to propose special management rules and financial tools for those areas. However, the RDP does not include any funding for forest owners to allow them to carry out and implement a new categorisation of forests which would take account of hydrological and biodiversity-related issues.

4 The RDP and EU objectives for biodiversity

The RDP should support the EU's Sustainable Development Strategy, the implementation of the Natura 2000 network, and the EU target to stop biodiversity loss by 2010. There are several opportunities for achieving this.

Minimum standards (see Chapter 3) would strongly support the increase of biodiversity in subsidised forests, helping to reduce biodiversity loss in Czech forests. However, some additional measures should be taken in order to contribute to Natura 2000 implementation and the EU goal of halting biodiversity loss, including:

1. Sufficient financial support for implementation of the Natura 2000 network in forest habitats
2. Additional targeted funding for biodiversity measures
3. Biodiversity safeguards in order to prevent EAFRD funding of damaging projects.

4.1 Funding for Natura 2000 and biodiversity

This is a heavily underfunded area in the RDP. Most of the money for forestry under Axis 2 will go into controversial and primarily commercial projects such as afforestation, and towards various subsidies to cover economic damage after natural disasters.

4.1.1 Natura 2000 payments in forests (RDP measure II.2.2, based on EAFRD Art. 46)

The RDP budget allocates €1.75 million/year for this important measure. However, in order to meet Natura 2000 commitments, a substantial budget increase will be necessary. It should be noted that the Government decided to phase in one additional submeasure into this measure from 2010 (see the August 2006 cabinet decree which formally approved the draft RDP). However, the budget for this measure is unclear. This is particularly important since the additional payment will support a non-intervention regime in at least some Natura 2000 sites. This will be much more effective in meeting the Natura 2000 objectives than the current submeasure. Native trees and an appropriate tree species mix are indeed vital for many species of community importance and listed habitats (Habitats Directive), or Annex 1 species (Birds Directive). It is important to make sure that they continue to be planted in Natura 2000 sites. However, many Natura 2000 species actually require much more in the way of multi-tiered forests, natural dynamics of the forest stand, old trees, hollows, deadwood or avoidance of fragmentation caused by unsustainable harvesting (clearcuts). That is why the focus on the conservation of more aspects of the forest habitat – including native tree species – by a non-intervention regime would be much more effective than conservation of the native tree species mix alone.

4.1.2 Forest-environment payments (RDP measure II.2.3, EAFRD Art. 47)

This measure supports the planting of broadleaved trees and firs, and sustainable forestry in general. It is also seriously underfunded, with an allocation of less than €2.25 million a year. By comparison, the controversial afforestation submeasure (II.2.1.1) alone will receive around €10.3 million/year, even though many projects will actually undermine Axis 2 objectives. Just as with Natura 2000 in forests, an additional payment designed to encourage veteran trees and deadwood being left in forests will be added from 2010, but its budget remains unclear.

Friends of the Earth believes that the budget of the Natura 2000 network in forest and forest environment measures should have been substantially increased in order to ensure that the Czech Republic meets the Natura 2000 objectives and the EU's goal of halting biodiversity loss by 2010. A good solution would be

to reduce the afforestation budget and to shift part of the money into the two underfunded measures: forest environment payments, and Natura 2000 payments.

4.2 Prepared measures with high importance for forest biodiversity

4.2.1 Payments linked to Directive 2000/60 (RDP measure II.1.2, EAFRD Art. 38)

WFD payments will be added to the Czech RDP in the later phases of its implementation. If implemented properly, they will also support the implementation of the Natura 2000 network. Unfortunately, until now, the measure aims to cover agricultural land only.

If river basin management plans are set up to reflect the high importance of forests for water retention and erosion control, the measure would contribute to sustainable forestry via support to environmentally sound forest management in hydrologically sensitive areas. Therefore FoE Cz recommends that the Government and the Commission consider the inclusion of these aspects in the future measure.

4.3 Missing biodiversity safeguards

Some of the Czech RDP's measures can both benefit the environment and cause major damage to biodiversity – depending on individual projects, and the specific criteria that they will be subject to. Concerning forestry, this is especially the case with the following types of activities:

1. Afforestation (measure II.2.1.1 of the draft RDP, based on Art. 43 of the EAFRD Regulation)
2. Water drainage and machinery for water drainage construction (measure I.1.2 – based on Art. 30 and Art. 27, respectively)
3. Liming and fertilisation of forests (measure II.2.4.1 – Art. 27)
4. Insecticide use in forests (measure II.2.4.1 – Art. 48)
5. Various forest production investments (measure I.1.2 – Art. 27)
6. Construction of new forest roads (measure I.2.3 – Art. 30)
7. Utilisation of branches and other logging (not sawmill) waste as energy biomass (measure I.1.2.2 – Art. 28).

We are especially concerned that some of the proposed Axis 2 measures will – completely contrary to Axis2's purpose and goals – fund activities that will lead to further loss of biodiversity and damage important habitats.

Some projects funded by these measures will further reinforce the problems discussed in this paper. According to the RDP, Ministry of Environment approval will be required for funding of some (but not all) of the high-risk activities listed above. (The procedure will be implemented by the Nature and Landscape Protection Agency – the MoE's subsidiary body.) While this is a welcome requirement, we do not believe that it solves the problem completely. In particular, we are concerned that it will be difficult for the Ministry of Environment to deal properly with activities where almost every project should be rejected (afforestation of meadows, construction of new water drainage in forests). There will be an obvious pressure on the Ministry to use its power to reject projects only as an exemption.

4.4 First afforestation of agricultural land

Subsidies have been a significant driver of afforestation in the country, financed first by the national budget and, since 2004, by the EU via EAGGF (both the Guidance and Guarantee funding instruments).

The EU Biodiversity Strategy requires that 'measures should be taken in relation to the afforestation or reforestation of areas to avoid endangering important and/or valuable ecosystems (e.g. wetlands,

steppes, peat lands, etc.) or the use of inappropriate tree species' (COM, 1998). Afforestation funding without effective safeguards may lead to a loss of extensive, high conservation value meadows and pastures, including habitats of endangered plant and animal species. This has repeatedly happened with government-funded afforestation projects in the Czech Republic.

For example, a recent academic study identified afforestation projects as one of the key threats to the remaining colonies of *Euphydras aurinia*, a butterfly species protected under the Habitats Directive, in the country (Hula et al 2004). Afforestation contributes to decline of several other threatened butterfly species. (Banes et al 2002). This is an indication that the current biodiversity safeguards for afforestation projects are insufficient.

There is no specification in the draft RDP as of to what kind of land can be included in EAFRD-funded afforestation. There is little need to fund afforestation projects in mountain and highland grasslands. Afforestation of this land is not only damaging for biodiversity, but it also does not substantially contribute to the measure's other goals: to increase forest cover and to prevent of soil erosion. The Czech Republic is a country with relatively high forest cover (33 per cent), and the proportion of forests in mountainous and upland areas is even higher, often more than 50 per cent. At the same time, there is a lack of forests and a genuine need for afforestation of arable land in some lowland floodplain areas. In addition, soil erosion is not a major problem in extensive meadows. Afforestation projects may (and do) lead to actual biodiversity loss and destruction of high nature value habitats, including those of species of community interest. At the same time, the proposed afforestation measure fails to deliver on some of the key Axis 2 goals (restoration of biodiversity) and some priorities of the National Forestry Programme. However, the EAFRD regulation requires that 'any first afforestation should be adapted to local conditions and be compatible with the environment and enhance biodiversity' (Preamble, para. 38).

We believe that the Commission should have asked the Czech Government to include the following funding criteria in the measure.

1. Projects should be limited to arable land only. This will prevent damage of high conservation value habitats. Afforestation of pastures and meadows is not a priority anyway, whether for biodiversity, or for the prevention of erosion or flooding. Therefore the efficiency of the measure will be reinforced rather than limited by this change.
2. The subsidy should be targeted on projects in sites (or regions) with a higher need for afforestation. There are several possible options:
 - a. Funding should be limited to floodplain zones (since this is a key priority; change of land use in floodplain zones from arable land to forests, meadows or wetlands is an urgent priority in the country, and targeted afforestation subsidy would be an effective stimulus for this; 'floodplain zones' are legally defined by the Czech law, so there should be no problem with defining the measure clearly)
 - b. Funding should be limited to administrative districts with less than 25 per cent forest cover (20 of 76 districts in the Czech Republic)
 - c. Funding in districts with forest cover above 25 per cent could be limited to establishment costs, as defined by the EAFRD regulation Article 43 (1) (a), and the annual premium covering maintenance costs, according to the Article 43 (1) (b) – i.e. loss of agricultural income would not be covered by the subsidy in non-priority areas
 - d. Funding in districts with forest cover above 25 per cent could be limited to projects that prevent soil erosion (the recipient would have to demonstrate this in the project)
3. Forest owners should be explicitly required to use pioneer species (birch, rowan, poplar) for a given time period (a minimum of five years, and a maximum of ten) before planting the target trees.

4.5 Forest investments

4.5.1 Water drainage in forests (RDP measure I.1.2, EAFRD Arts 27 and 30)

Water drainage projects may damage the biodiversity of valuable wetland habitats (alder forests, small forest wetlands). They also lead to a higher water run-off, worsening flood situations. The Czech Government is well aware of this. The Ministry of Environment warned that EAFRD-funded construction and reconstruction of water drainage would 'contribute to biodiversity loss', 'damage water and wetland habitats', 'pollute surface water and, potentially, groundwater' etc. (Miko 2005). Funding of such activities would be clearly in breach of the EAFRD's stated goals and EU's Sustainable Development Strategy.

Friends of the Earth have recommended that funding for water drainage projects is eliminated from the RDP altogether.

4.5.2 Restoring forestry potential after natural disasters and introducing preventive measures (RDP measure II.2.4.1, EAFRD Art. 36 b vii)

The subsidy includes support for liming and fertilisation projects that are highly controversial. While they may be of benefit to forest soils in some cases, other projects damage soils and biodiversity.

A major government report on the health status of Czech forests warned that the (so far heavily subsidised) liming of forests 'sharply and for a relatively short time changes chemical conditions', 'leads to homogenisation of the soil environment', 'speeds up' soil degradation, and may be beneficial somewhere while having a 'minimal or even negative effect in other conditions.' (Hruska, Cienciala 2001)

FoE Cz believes that there are two possible options: either to remove liming and fertilisation projects from funding altogether, or to limit funding to projects that meet following criteria:

1. Only local liming and fertilisation of individual trees – i.e. no aerial application – should be eligible for funding
2. The recipient submits a wider project to demonstrate that the proposed, urgent application of liming and/or fertilisation will be accompanied by other measures aimed at long-term reduction of acidity and improvement of soils. It makes little sense to subsidise liming if the forest owner subsequently continues to plant conifer species that further acidify the soil, or practises clearcuts with a similar effect.

The RDP should have explicitly required that the project includes the following: (1) planting of broad-leaved tree species, (2) avoidance of clearcuts and (3) leaving a substantial part of biomass (all branches and other post-logging waste) on the site after harvest.

4.5.3 Utilisation of branches and other logging residues as energy biomass (RDP measure I.1.2.1, EAFRD Art. 28)

FoE Cz in principle welcomes the support for biomass use in energy production. There are several measures in the draft RDP that will fund renewable energy projects in general and biomass in particular. This funding will bring important environmental and economic benefits: CO₂ emission reduction and regional development of rural economies. This is, generally speaking, also the case with timber production waste utilisation that is to be supported by the proposed Investment in the Forests measure (I.1.2). However, such support needs to be limited on sawmill waste.

Logging residues are a critically important source of nutrients and basic elements for forest soils, and measures aimed at their utilisation should be removed from the scope of eligible projects. A government report has emphasised that, to reduce soil acidification, 'Logging waste [needs to be] used for gradual enrichment of the soil with nutrients. ... Deacidification depends on slow decomposition of organic matter. ... By contrast, burning of logging waste or its collection and removal outside the harvest site is

the prevailing method [of dealing with the waste] in most of the forests in the Czech Republic.' (Hruska, Cienciala, 2001)

Loss of basic elements and nutrients (calcium and magnesium) in spruce forest harvest is reduced by about 60 per cent if branches and needles are left on site, compared to removal of entire trees. (Hruska, Cienciala)

FoE Cz believes that there should be clear rules in place concerning sensitive forest areas, where no logging waste usage will be allowed and where a specified amount of biomass will remain in situ. As a minimum, any support for logging waste utilisation should have been removed from the RDP.

4.5.4 Insecticide use in forests (RDP measure II.2.4.1, EAFRD Art. 48)

Insecticide use – in particular indiscriminate, large-scale spraying – may cause serious damage to forest biota, especially insect communities and soil life.

The Czech branch of Friends of the Earth has recommended that support for insecticide use in the RDP is constrained in one of two ways:

1. Application of insecticides should be limited to timber piles, and support for large scale spraying should be removed from the RDP
2. An alternative solution would be to add three specific criteria to this measure: (1) insecticide applications against leaf-eating insects in broadleaved trees should not be eligible for funding (because leaf-eating insects usually do not kill broadleaved trees on a large scale – while bark beetles and similar species do so in conifers); (2) any protected areas should be off-limits for funding; and (3) the recipient must provide an independent assessment demonstrating that there is no alternative solution available to reach environmental criteria.

4.5.5 Construction of new forest roads (RDP measure I.1.2, EAFRD Art. 30)

The Czech forest road network is very dense. There is no good reason for investing substantially in the construction of new roads. Further construction would increase water run-off and soil erosion – two problems that some Axis 2 measures are supposed to deal with. The National Forestry Programme says that 'excessive density of internal traffic infrastructure' in the Czech forest sector is already a problem (p. 10).

There were two possible options for this measure:

1. Funding could be limited to reconstruction of existing roads
2. Applicants could be required to submit an independent assessment of the hydrological impact and also alternative solutions with the project, to ensure that high-risk or unnecessary projects do not receive funding.

5 Partnership in the RDP preparatory process

The problems discussed above should, in principle, be dealt with by implementation of the partnership principle as defined by the EAFRD regulation:

‘EAFRD assistance shall be implemented through close consultations (hereinafter partnership) between the Commission and the Member State and with the authorities and bodies designated by the Member State under national rules and practices, including ... any other appropriate body representing civil society, non-governmental organisations, including environmental organisations ...’ (Council Regulation (EC) 1698/2005, Art. 6).

However, the process in the Czech Republic was rather weak and chaotic. An original set of proposals for individual measures was prepared by working groups of government and independent experts during the first half of 2005, under the coordination of the Research Institute of Agricultural Economics. The non-governmental experts were mainly officers from farmers’ organisations or individual companies. Despite the explicit requirement for environmental NGOs to participate in the development of national RDPs (Art. 6 of the EAFRD regulation), there was not a single environmental NGO representative among approximately 140 members of the working groups (although one animal welfare organisation and one community development NGO were represented, each in one working group). Since then, several draft versions of the RDP have been developed by the Ministry of Agriculture.

There was no formal public consultation, i.e. no opportunity for written comments on any of the RDP drafts by the public.

The Ministry of Agriculture organised a series of eight regional seminars on the RDP/EAFRD, and these were open to the public, farmers, community leaders and other stakeholders during February 2006. The seminars were attended by high-level ministry officials, including the minister, and provided an opportunity for brief oral comments and/or discussion on general issues and the budget. The exercise was useful for brief discussions about basic principles of the RDP. However, it was totally inadequate as the only tool of public consultation, due to the lack of opportunity for debate on individual measures, the extreme shortage of time (the concluding seminar in Prague, which had been explicitly prepared for NGOs and trade bodies such as farmers’ organisations, had around 80–100 participants – our estimate – and lasted three hours). The lack of time meant that a number of participants had no chance to speak. In addition the format of the event (oral discussion and brief statements) did not allow for any in-depth debate about individual measures and their technical details. Details of the proposed measures were not even available. Therefore the seminars were no substitute for a written consultation.

Public promotion of these seminars was low-profile. Environmental NGOs – including the Green Circle, and Friends of the Earth, which submitted detailed (30+ pages) comments on the draft RDP several weeks before the seminar – received no invitation. Several environmental NGOs were able to participate in the seminar only because a staff member of Friends of the Earth happened to come across some information about the event.

Strategic Environmental Assessment is meant to be the key opportunity for public consultation. But the key phases of the SEA did not come till very late in the process: the public hearing (3 July 2006) followed several days after the formal closure of the official government inter-service consultation (which is the final step before the proposal goes to the cabinet for approval). The deadline for public comments was five days after the hearing. Therefore there was hardly any chance that issues raised in the hearing or in public comments would lead to changes in the draft RDP.

We understand that the Government somehow opened the inter-service consultation for some

non-government bodies, since the comments of some trade organisations and other bodies were responded to in the process. However, environmental groups (including those who had proactively submitted their comments during the process in previous months, and had received response letters from the Ministry of Agriculture) were not invited to comment on the draft RDP in this procedure.

The Government did respond to the written comments of some NGOs mailed to the Ministry of Agriculture on an ad hoc basis, but the responses were very brief and, in many cases, were limited to a statement that the proposals had been rejected, without any explanation. Some concerns were not responded to at all.

There was no public involvement at all in subsequent modifications of the RDP which followed the Programme's withdrawal from notification, and renotification, by the new Government (from September 2006 onwards).

5.1 Monitoring committees

The RDP Monitoring Committee consists of government departments, trade bodies and NGO representatives. However, there is only one seat for any NGOs, apart from trade bodies (such as farmers' associations). A community development NGO was selected. Therefore the committee has got a number of members representing trade bodies, only one member for all other NGOs, and no representatives from environmental groups (or animal welfare groups, renewable energy lobbies etc.)

5.2 National rural development strategy consultation

The strategy has undergone an SEA, which includes an opportunity for NGO comments. However, the strategy was a purely formal exercise; the Czech Government is required to produce a paper by EU law, so it has produced one just to meet the legal requirement. This is typical for various kinds of strategies, action plans and so on. The strategy was produced more or less in parallel with the RDP, and the real decisions were taken during the RDP debate. The strategy does include some strategic information (such as division of EAFRD funds into RDP axes), but this was simply taken over from the RDP debate and included in the strategy.

References

- Beneš J. et al.** (eds) 2002. Butterflies of the Czech Republic: distribution and conservation. Butterfly Conservation Society, Prague.
- COM (98) 42.** 1998. Communication of the European Commission to the Council and to the Parliament on a European Community Biodiversity Strategy, February 1998.
- Dröbner, L., and von Lüpke, B.** 2005. Canopy gaps in two virgin beech forest reserves in Slovakia. *Journal of Forest Science* 51 (10): 446–457.
- Dudley, N., and Vallauri, D.** 2004. Deadwood – living forests. WWF, Gland.
- Forest and Management Institute:** http://www.uhul.cz/en/il/NIL_AJ.pdf
- Hanski, I., and Walsh, M.** 2004. How much, how to? – Practical tools for forest conservation. BirdLife International, Helsinki.
- Hruška, J., and Cienciala, E. (eds)** 2001. Dlouhodobá acidifikace a nutriční degradace lesních půd – limitující faktor současného lesnictví. (Long-term acidification and nutritional degradation of forest soils – limiting factor of current forestry.) Ministry of Environment, Prague.
- Hula, V., Konvička, M., Pavlíčko, A., and Frič, Z.** 2004. Marsh Fritillary (*Ephydryas aurinia*) in the Czech Republic: monitoring, metapopulation structure, and conservation of an endangered butterfly. *Entomologica Fennica* 15: 231–241.
- MCPFE.** 2003. State of Europe's forests 2003: the MCPFE report on sustainable forest management in Europe, Ministerial Conference on the Protection of Forests in Europe Liaison Unit, Vienna.
- Miko, L.** 2005. Vice-minister of environment: letter to Martin Fantyš, section director, Ministry of Agriculture, 17 March 2005.
- Ministry of Agriculture.** 2005. Zpráva o stavu lesa a lesního hospodaření České republiky. (Report on forests and forestry in the Czech Republic.) Ministry of Agriculture, Prague.
- Plantlife International.** 2005. Important Plant Areas in Central and Eastern Europe: priority areas for plant conservation.
- Podrázský, V., Remeš, J., and Čížek, M.** 2004. Přírodě blízké LH a stav lesních půd. (Close-to-nature forest management and situation of forest soils.) *Lesnická práce* 83 (1): 18.
- Scientist and expert statement on Czech forest protection, Prague, May 2006.**
- Vrška, T., and Hort, L.** 2001. Podíl tlejícího dřeva v přírodních lesích ČR. (Amounts of decaying wood in natural forests of the Czech Republic.) In: Jankovský, L., and Čermák, P. (eds) Tlející dřevo 2001. Sborník referátů. (Decaying wood 2001. Conference Proceedings.) Mendel University of Agriculture and Forestry in Brno, Brno.

Contact

Zdenek Postulka

Hnutí DUHA (Friends of the Earth Czech Republic)

A: Bratislavská 31, 602 00 Brno

T: +420-545-214-431, 732-95-75-52

F: +420-545-214-429

E: zdenek.postulka@hnutiduha.cz

<http://www.hnutiduha.cz>