

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**

Note: This report has been prepared by the Commission on the basis of the consultation. It does not commit the Commission in any way, nor does it prejudge the final form of any decision taken by the Commission.

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1. GENERAL CONTEXT

On 15 December 1998, the European Council adopted a Resolution on a Forestry Strategy for the European Union. The main driving forces behind adoption of the EU Forestry Strategy were the growing concern about the coherence between the forest policies of the Member States and forest-related activities at the EU level, as well as the rising profile of forests in international policy debates and initiatives on sustainable development.

Implementation of the EU Forestry Strategy is a dynamic process, as stated in the Council Resolution. The strategy encourages a participatory and transparent approach involving all stakeholders, while recognising the wide variety of ownership regimes within the Community and the important role of forest owners. Today, this approach is becoming mainstream practice in national policy and decision-making in the forest sector.

The Council Resolution on an EU Forestry Strategy asks the Commission to report on the implementation of the Strategy five years after its adoption. The Commission believes it is in the spirit of the Strategy to make public consultation part of this exercise. An active exchange of information and communication is essential if forest-related issues in the European Union are to be addressed in an adaptive manner, so that we can learn from our positive achievements and make improvements where shortcomings or gaps exist.

In order to ensure a balanced representation of all important issues and to account for all relevant activities completed throughout the EU during the five years of the implementation of the Strategy, an extensive consultation with the Member States and stakeholders in preparation of the Draft Commission Staff Working Document took place in the relevant Commission committees.

In order to complement this consultation process, the Commission launched an internet-based stakeholder consultation on the Draft Commission Staff Working Document to give stakeholders an opportunity to provide their input. This report describes the process and the main results of the consultation.

This document does not in any way reflect the position of the European Commission. It merely summarises the comments received from stakeholders.

2. OVERVIEW OF THE CONSULTATION PROCESS

2.1. Structure of the process

The stakeholder consultation was launched on 13 August 2004, with corresponding information provided on the Commission website. The deadline for contributions was initially set for 15 September 2004, but at the request of some stakeholders it was extended until 22 September.

The relevant information provided for the consultation contained general information on the consultation and links to a privacy statement, the text of the EU Forestry Strategy of 1998, the Draft Commission Staff Working Document and a list of questions for comments. Except for the Working Document, which was only in English, all documents were in three languages - English, French and German.

To facilitate the analysis of the contributions and the processing of the responses, stakeholders were asked to answer a series of questions. The questions closely corresponded to the sections of the Working Document. In most sections, three questions were asked:

- Do you think that all important issues relevant to this section have been included; or do you think that some issues are underrepresented?
- Do you think that there has been progress in the implementation of the EU Forestry Strategy in this area?
- What do you foresee as the major needs for improvement in this area in the future?

Stakeholders were also asked for general comments on the report and “whether all important issues in the European forest sector have been included in the document or whether some issues are underrepresented”. On the emerging issues, they were asked to list the “major needs to be addressed in the context of the EU Forestry Strategy in the future”.

Stakeholders were asked to specify whether the input was individual or from an organisation, and if so, which one. They were also asked to provide contact information. Contributions could be submitted by e-mail to a specific address which had been created for the purpose.

2.2. Type of contributions

There were 58 contributions, all but four of which responded to the questions. All contributions were included in the analysis.

Contributors can be grouped according to their type and the interests they represent, as follows:

- **Private individuals.** In the last section of the questionnaire stakeholders were asked whether they were answering as an individual or whether they represented an organisation, institution or country. Most of those who answered as individuals were professionals (academics, members of associations, managers, etc.).

- **Private Companies.** These contributors were from a whole range of private companies involved in various forestry activities (e.g. timber processing, consulting, forestry services).
- **Academia.** There were contributions from research institutions and universities.
- **NGOs.** About half of these were either international or national-level environmental NGOs.
- **Associations and federations.** There was a broad range of contributors, from landowner associations to an interest group within a political party. They are all involved in forestry-related activities at international and national level.
- **Government bodies.** Besides government institutions, this category also includes semi-governmental bodies, such as state-owned forestry companies.
- **Member States.** Although Member States had an opportunity to report to the Standing Forestry Committee, they were also encouraged to participate in this stakeholder consultation. Three Member States sent comments.

Figure 1 shows the distribution of contributions by type of contributor. A list of contributors is annexed to this report.

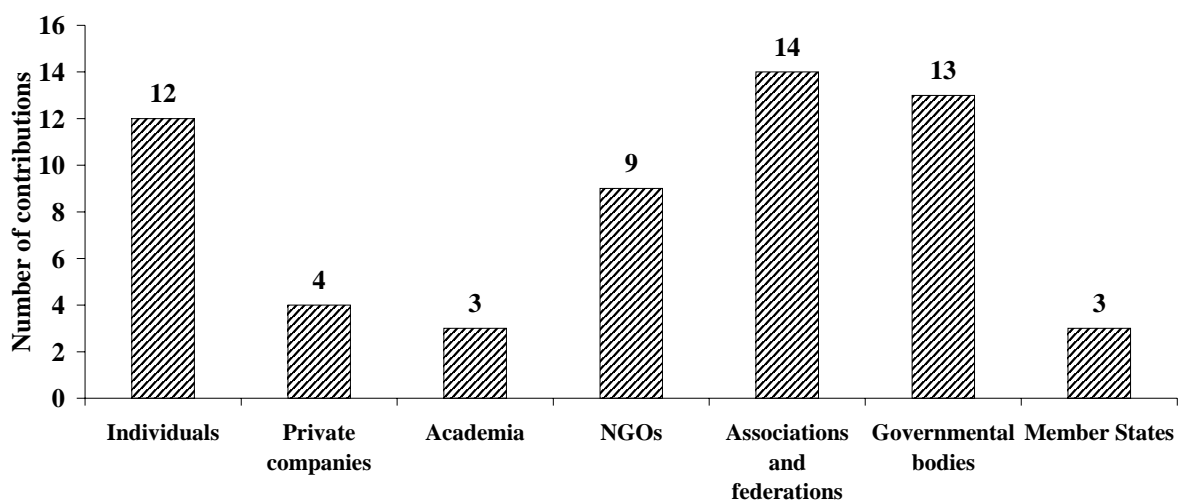


Figure 1. Number of contributions by type of contributor

Overall, there was substantial interest in the consultation, but it is difficult to say whether the number of contributions can be considered as high, adequate or low, as this is the first time the Commission has launched a broad stakeholder consultation on forestry. Experience from other internet consultations shows that the number of responses tends to be higher. On the other hand, this consultation requested qualitative input instead of the quantitative input requested in most other consultations. This was probably the main reason why there were perhaps not as many contributions. However, since qualitative comments provide a very

valuable input into the reporting process, we can conclude that the objective of the consultation was met.

Some stakeholders found the period for consultation too short. Some criticised that the Working Document was available only in English. Even though most of the comments were in English, some were also made in German, French, Spanish and Czech.

2.3. Analysis of responses and presentation of results

Most contributions were well elaborated. In particular, the comments of NGOs and associations/federations were specific and exhaustive.

There were some simple “yes” or “no” answers, but only in sections that were not of priority concern to stakeholders. On other sections full comments were provided.

Most comments were on the sections: “General comments”, “Forestry and rural development”, “Forests and biodiversity” and “Forest certification”. Not all comments were in the right sections. They were considered in the appropriate sections.

For the analysis: (1) all contributions on specific sections were combined; and (2) within each section, interrelating, specific and technical contributions were identified. Interrelating contributions are those that could be put together into separate sections or paragraphs on a single issue; they form the largest part of this report. Specific contributions are those relevant to individual areas, but which do not directly relate to the main body of the text in a specific section or to comments by other stakeholders. Technical contributions are comments on the text of the Working Document.

Generally, most of the comments summarised in the following sections are forward-looking and address the need for change in specific areas of the EU Forestry Strategy. The points addressed in the “General comments and emerging issues” section are points that did not directly relate to any of the other sections of the Working Document.

3. SUMMARY OF COMMENTS

3.1. Trends in EU forest policy

It was stressed, in particular by socio-economic interest groups (representatives of forest owners and forest-based industries), that the EU Forestry Strategy needs to contribute to the overall goal of the EU to become the most competitive and dynamic knowledge-based economy in the world, and to implement the overall objective of sustainable development, as expressed in the Lisbon Strategy, in the forest sector. In the future, the EU Forestry Strategy should include specific measures to ensure coherence between various policies affecting forests, including EU policies on biodiversity, agriculture and rural development, environment, trade, energy, climate change, water and transport. Some stakeholders proposed more EU-level initiatives, such as a Community action plan, to serve as a basis for more coherent forest-related actions and to allow more targeted use of Community funds.

The Strategy should also contain a vision statement aimed at the common citizen and it should be developed in an open, transparent and participatory fashion.

3.2. Development of National Forest Programmes

Some stakeholders questioned the extent to which the EU Forestry Strategy has helped the development of national forest programmes (NFPs) and how the results of NFPs have influenced Community policies.

It was felt that more attention should be given to a participatory approach in the future. It was suggested that Member States should be encouraged to establish statutory forums on NFPs. These forums would consist of representative stakeholders and would monitor implementation, give high-level advice and provide input for decision-making. They would give overall direction and guidance and act as the link between regulatory bodies and the sector as a whole.

The need was expressed for better consistency between objectives of relevant EU policies and NFPs. It was considered important to endorse common overall principles in all NFPs. There were suggestions that one essential element of a NFP should be a clear statement of objectives and priorities, together with a political and financial commitment to achieve those objectives. The EU could play a more active role in the development of NFPs, i.e. by proposing common framework criteria.

Progress could be facilitated through a better exchange of information among countries regarding their experiences with implementing NFPs. It was also suggested that in the future there should be regular monitoring of and reporting on the effectiveness of NFPs.

3.3. The EU and the international forest regime

In general, governmental bodies and socio-economic interest groups emphasised the importance of the UN Forum on Forests (UNFF) and the need for a Global Forest Convention, which is seen as a way to recognise forestry and the forest-based industries as a self-standing sector. Even if no legally binding agreement on forests is adopted, there is still a

need for a global forum to take responsibility for comprehensive discussions on forest policy at international level. Some contributors wanted a clear commitment from all EU Member States that in the future UNFF and MCPFE would become the leading policy platforms for discussion of sustainable forest management. It was suggested that the EU could develop a more ambitious negotiation mandate for the UNFF and the MCPFE. Since EU forest activities have a global impact, the EU should participate more actively in international forest debates.

The environmental NGOs emphasised the relevance of the Convention on Biological Diversity to the forest sector on a global level.

Some stakeholders considered it of the utmost importance that, in addition to participating more actively at international level, governments should also report on progress in implementing existing commitments.

The FLEGT (Forest Law Enforcement, Governance and Trade) initiative was perceived very positively, with comments emphasising the sensitivity of the issue and the importance of implementation. It was stressed that, to be successful, the fight against illegal logging has to focus on capacity building and support for good governance and law enforcement in the wood producing and exporting countries, many of which are developing countries.

3.4. Forestry and rural development

The consolidation of all the forestry measures in the Rural Development Regulation (EC 1257/99) into one single chapter was welcomed and seen as a good way of integrating forestry into sustainable rural development. However, stakeholders felt that there was still a need for further and better integration of forestry into rural development programmes.

It was stressed that there should be better mechanisms for ensuring consistency between rural development programmes and NFPs, so that the needs and challenges of forestry would be more closely reflected in rural development policy. More attention should be given to monitoring progress towards meeting the broader aims of rural development achieved through forestry measures. There should be more emphasis on the relationship between forests, rural areas and environmental services, and on measures to deliver sustainable multi-benefit forest management across the EU.

The role of private forest owners in the context of rural development was emphasised and the importance of forest owners' associations was stressed. In general, the role of forestry, the forest industry (including the production of wood and non-wood forest products) and other forest-based activities (hunting and tourism) in the economic development of rural areas should be better recognised and given more emphasis in the future. Programmes for afforestation on abandoned farmland could be one of the ways of facilitating rural development, since in the past afforestation measure had helped create jobs and wealth in some of the most remote areas of the EU.

Encouraging the production and provision of non-timber goods and services was of particular importance for economic diversification in rural areas and the emergence of new economic development opportunities. There were some comments on specific points of the proposed Rural Development Regulation for the post-2006 period.

3.5. The Sapard programme

There were relatively few comments on this issue. Stakeholders wanted forestry measures to be made more accessible to the target group and they asked for more support for private forestry and assistance and support for strengthening and developing associations of forest owners. Some contributors expressed concerns that measures financed under Sapard did not fully recognise the significance of historic and cultural landscapes, and did not sufficiently address EU biodiversity conservation objectives.

3.6. EFICS

Some stakeholders argued that the European Forest Information and Communication System should be further developed in order to gather and disseminate the available data on the forest sector more effectively. The implementation of the system could be supported by a legal and financial framework. EFICS should be given more publicity.

It was suggested that EFICS should represent the spatially explicit data models that would make analysis and comparison of European forests possible. The models should allow varying levels of forest complexity to be represented and would enable individual organisations to share the information. Stakeholders stressed that it was important to avoid duplication and incompatibility with recently designed or enlarged instruments at EU and international level. There should be coherence at EU level and a commitment to collect data holistically. Better use should be made of forest inventory information.

3.7. EU forest monitoring measures

Stakeholders consider the new "Forest Focus" Regulation as a definite improvement that opens the way for future development in forest monitoring. The expanded scope of Forest Focus, which goes beyond monitoring the impact of air pollution and fires and allows for the development of new activities covering biological diversity and soil protection, is a significant step towards a holistic approach to forest use and protection. However, it was also stressed that in the context of sustainable development, monitoring should be addressed in a comprehensive way including the socio-economic aspects of the forest sector.

Standardisation of methods and harmonisation of terminology were mentioned as tasks to be addressed in the future. Some stakeholders pointed out that the implementation of Forest Focus could be facilitated if more resources were allocated to it, and if it were backed by legislation enabling the development and harmonisation of forest monitoring procedures. The need for better communication of the results and a non-technical interpretation of their meaning for a wider audience was expressed.

Environmental NGOs emphasised in particular the need to map, study and monitor forest biodiversity both inside and outside protected areas.

3.8. Forests and biodiversity

Reactions under this section covered a broad range of issues and were, in general, well balanced. The positive roles of the MCPFE and the NATURA 2000 network were emphasised

as key issues, but there was still a need to increase the role of forest management in conservation efforts. Environmental NGOs and some individual contributors deplored the lack of progress on biodiversity conservation and restoration. Others emphasised the positive achievements in this area, and felt that biodiversity is now much more important in forest management than ever before.

In the future, the EU Forestry Strategy would need to ensure that all Community actions acknowledge the holistic nature of forestry with respect to all three pillars of sustainability. Actions on biodiversity conservation and other forest-related policies should be coherent. It was emphasised that forest management in European forests has a cultural dimension and has traditionally served multiple functions.

The economic and social considerations of conservation received special attention. Socio-economic interest groups wanted a better evaluation of how conservation measures can influence other aspects of sustainable forest management, and in particular analysis of the cost-efficiency of conservation policies and measures. Sufficient financial resources should be allocated for the Natura 2000 network. There was a need for increased awareness raising and education and better public participation in setting conservation priorities (especially on Natura 2000 sites).

Environmental NGOs called upon the European Community to ensure that the Natura 2000 process provides comprehensive protection for all forest species and habitats listed in the EU Birds and Habitats Directives. Completing the designation process, including in the new Member States, should be a priority.

Some stakeholders considered that over the coming decades climate change will require a dynamic approach to biodiversity conservation. Conservation goals can be reached better through a combination of complementary measures, namely establishing an ecologically representative forest conservation network and simultaneously promoting biodiversity enhancement in commercial forest stands. Representatives of forest owners and the forest-based industries pointed out that active forest management may also help conservation. Environmental NGOs wanted more emphasis in the future on forest habitat restoration and landscape planning.

3.9. Forests and climate change

On the contribution of forests to mitigating the effects of climate change, a general need was expressed for better communication between national and European institutions. There should be a more coherent and holistic approach to this issue. Understanding the priorities at national and European level and improving the harmonisation of national activities in the framework of the commitments under the UN FCCC, the Kyoto Protocol and the ECCP, was seen as a condition for national and European progress.

Many contributions stressed the need to assess and monitor the impacts of climate change on forests and to develop measures to adapt to these impacts. In the future, the EU Forestry Strategy should consider a balance between mitigation measures (reduction of green-house gases) and adaptation measures (adaptation of forests to a changed climate). The mitigation measures would have to be socially and environmentally acceptable, while the adaptation strategies would need to be given a higher profile, from both a biodiversity and a socio-economic perspective.

Some stakeholders emphasised that wood-based products should be recognised as carbon pools and the use of wood should be promoted for construction and household consumption. Generally, these respondents want the public to be informed that forests can sequester substantial amounts of carbon and help to create renewable alternatives to the consumption of fossil fuels and other non-renewable materials.

The issue of ownership of sequestered carbon was seen as needing more attention in the future implementation of the EU Forestry Strategy. Moreover, measures to promote biomass for energy production have so far not yielded the expected results. There was a need for a multifunctional approach to carbon sequestration in forest management and afforestation.

Some contributions underlined that the climate change mitigation effects of active forestry measures should be given more emphasis in the future, with particular attention to afforestation and reforestation.

3.10. Forest-based and related industries

Contributors emphasised the need to recognise that the EU forest-based industries are a self-standing sector, to allow a coherent and holistic approach in dealing with sector-related issues. There was some dissatisfaction that horizontal and issue-driven policies currently have a strong and direct impact on the forest-based and related industries. Despite efforts to increase the competitiveness of EU forest-based industries, current policies are often felt to reduce the potential of European industries to be competitive on a global market.

The future role of the EU Forestry Strategy should be to facilitate the development of an enabling environment within which the forest-based industries can enhance their competitiveness. Promotion of wood from sustainably managed forests was seen as one of the priorities for future work. Some respondents expected that the instrument of certification could be used to ensure that timber, wood and non-timber forest products harvested under non-sustainable forestry practices, would not reach the EU markets.

The concern of the forest-based industries regarding energy from biomass was emphasised. It was pointed out that in the future it is very important to align the goal of the European Community to support economic competitiveness with climate change mitigation targets which, among other activities, are being addressed by promoting the use of wood biomass energy. Some felt that not enough attention was being given to the economic importance of non-wood forest products, small and medium-sized enterprises, and forest services, particularly in the context of rural development.

3.11. Forest certification

There were diverging views on forest certification. On one hand, some stakeholders felt that the European Community should maintain a neutral position concerning certification and in general facilitate certification as a voluntary market-based tool. Environmental NGOs, on the other hand, suggested that forest certification should not be only a market tool, but also a long-term strategy to ensure development towards sustainable forest management. They wanted a specific certification scheme to be acknowledged and promoted under the future EU Forestry Strategy.

Various stakeholders wanted to see a rise in the area of independently certified forests, and called for increasing the use of certified wood by promotion of its use in the manufacturing of forest-based products, and for promotion of certified wood and forest-based products in general. Socio-economic interest groups did not want to see trade barriers or discrimination against products from a single country or certification scheme within the EU. In general, chain-of-custody certification was seen as making slow progress compared with forest management certification.

Some comments saw the division between the two main certification schemes operating in the EU (FSC and PEFC) as an obstacle to the overall development of the certification process. The socio-economic interest groups, together with some other stakeholders, wanted mutual recognition instead of further discussions on the different certification schemes. Several stakeholders felt that certification schemes should better account for the special situation of private forest owners.

Some contributions pointed out that originally, forest sector certification had largely been aimed at preventing unsustainable forestry practices in developing countries. At present, more forests are certified in developed countries than in developing countries.

3.12. Research

Stakeholders stressed that, although EU framework programmes provided opportunities for forest research, they were rather fragmented. Since the importance of forests and forestry was expected to increase in the 7th Framework Programme, the focus should in the future be on the forest sector as a complex entity, and not just on forests as part of research activities in other fields. Research should be better co-ordinated, especially as regards the exchange of information and the dissemination of results between forestry practitioners and scientific institutions.

There should be more collaborative research on the effects of climate change on forests and on how to minimise these impacts.

The role of forests in creating economic and social welfare should be better studied. According to some stakeholders, research should give more consideration to studies on all different expectations of society regarding the economic, social and environmental values and services from forests, the value of trade-offs between them, the development of new products and services based on wood, and the validation of the importance of wood-based products as carbon pools.

3.13. EU development co-operation on forests

There were very few comments under this section. The majority of the contributors called for more co-operation with developing countries in the forest sector in the future. Forests, including the environmental dimension, need to become part of development and poverty alleviation strategies.

3.14. Co-ordination, communication and co-operation

Stakeholders referred to insufficient co-ordination, a lack of resources for this purpose, and the question of policy coherence in general. There needed to be more co-operation within the sector and more communication with the general public, with sufficient knowledge, expertise and competence applied to planning and decision-making on forestry issues. It was thought that a better system of communication and co-ordination would require more human and financial resources.

However, efforts by EU institutions to improve the situation were also noted. There were many specific suggestions on how to improve co-ordination, communication of and co-operation on forest-related issues focusing largely on possible changes in the EU institutions.

Some considered that, for co-ordination of forest policy at EU level to have any real added value, there had to be a clear and visible mandate and an established co-ordination framework. The possibility of establishing a Committee of Members of the European Parliament dealing with forestry-related issues was also mentioned.

One improvement might be to establish a horizontal co-ordination unit within the Secretariat-General, which could co-operate closely with the Commission departments involved with forests and forestry-related issues. Others suggested that forestry-related issues should be addressed by a separate Directorate-General, or else exclusively by one DG. It was also suggested that an EU Forestry Forum should be established to overcome the lack of communication at local and regional level.

The current integration of existing consultation mechanisms, the Council Working Group on Forestry, the Standing Forestry Committee, and the Advisory Group on Forestry and Cork, was seen as being insufficient in policy formulation. It was suggested that the Council Working Group on Forestry, the Standing Forestry Committee and the Advisory Group on Forestry and Cork should co-ordinate their activities pro-actively in order to avoid duplication and make policy formulation more consistent. It was also proposed that the combined expertise and knowledge of these three groups should be used for ex-ante policy advice.

Several stakeholders urged the European Community to take a more active and greater co-ordination and facilitation role in the development of the European forest sector.

3.15. General comments and emerging issues

This section summarises comments that did not come under any of the headings in the Draft Commission Staff Working Document. They cover a broad range of issues, but some trends in the opinions of the stakeholders could be determined.

A common concern was the economic aspects of sustainable forest management. Stakeholders (in particular socio-economic interest groups) considered that forest-related issues should be placed in the context of the Lisbon Strategy and the development of the knowledge-based economy. It was strategically and economically important to use natural resources, including land, to the best comparative advantage, and ensure long-term self-sufficiency of wood supplies and the supply of other forest products and services in Europe. There was a call for proper recognition of the constraints and challenges faced by the timber-supplying sector, the

woodworking industries and other economic activities depending on forests, especially in view of the predominance of small and medium-sized enterprises in the sector.

In the context of overall sustainable development, the competitiveness and the economic viability of forestry should receive more attention in the future. Meeting society's needs should not continue to place a burden on private forest owners. To facilitate the competitiveness and economic viability of the forest sector, some stakeholders stressed that, if public goods and services are to be provided to society by forest owners in the future, adequate recognition of the costs involved and subsequent compensation will be necessary.

Compensation for meeting society's needs could be based on established mechanisms to assign a commodity value to environmental and social goods and services. However, for now, stakeholders noted the lack of information on the economic value of non-wood forest goods and services and pointed out that, in certain areas, non-wood benefits (provision of environmental and social functions) are becoming increasingly more important than wood supply.

The socio-economic and ecological benefits of forestry should be promoted, along with the use of wood from sustainably managed forests, in order to change the present perception of forestry by society.

Some stakeholders proposed that in the future there should be a set of indicators of achievements or targets for the main areas of the EU Forestry Strategy. Environmental NGOs also wanted that minimum EU standards be set for forest management, together with conservation thresholds, to help validate proposed management activities and provide the means for assessing multiple outcomes.

Some stakeholders stressed that the constraints and challenges faced by the owners of small forest holdings should be better considered in future implementation of the EU Forestry Strategy. More recognition should be given to private forest owners and their agencies to underline their special role in addressing forestry issues.

Afforestation and reforestation were also felt to need more consideration in the future. Support for afforestation can both, enhance biodiversity and environmental services, and lead to loss of non-forest habitats based on traditional land uses with high ecological value. Different opinions were expressed as to the need to place these activities in the context of landscape-scale processes.

Agroforestry and silvopastoralism were seen as two potentially sustainable forms of land management and as land use forms that could be better used for rural development in the future. Some contributors regretted that not enough emphasis had so far been given to raising the awareness of policy-makers, natural resource professionals and farmers, as regards the potential of agroforestry and silvopastoralism.

Finally, contributors argued that more emphasis should be placed on the social dimension of sustainability and on urban forestry, and on the need for more public participation in forest-related decision-making in general.