



European Federation of Forest Owner Municipalities
Fédération européenne des communes propriétaires de forêt
Europäische Vereinigung gemeindlicher Waldbesitzervertretungen

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STATEMENT ON THE FITNESS CHECK OF THE EUROPEAN BIRDS AND HABITAT DIRECTIVES

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These last years, the FECOF members contributed to the European initiatives concerning the Natura 2000 directives. They brought their experiences and their proposals within the working group associated to the preparation of the Commission report " Natura 2000 and forests " published in 2015. They participated in the process of evaluation (fitness check) led by the European Commission to examine the effectiveness, the efficiency, and the relevance of the directives established more than 20 years ago.

The FECOF members pay a particular attention to the ending fitness check process and to the follow-ups which will be done.

In the Member States where the share of the communal forest ownership is higher than 15% (Belgium, Bulgaria, the Czech Republic, France, Germany, Italy, Luxemburg, Slovakia, Spain, Sweden, ...), the forest municipalities have a particular concern regarding the implementation of the Natura 2000 directives. The forest municipalities and other local authorities assume indeed specific responsibilities regarding the implementation of the European nature laws on the ground:

- First, as forest owners, being responsible of sustainable management practices carried out under a balanced approach which takes into account the whole environmental, social and economic values of forests under the multifunctional principle.
- Secondly, as representatives of the rural society, taking into account the contribution of traditional activities which improve the quality of life of the population.
- Thirdly, as local policy makers, heading sustainable development projects based on the contribution of forests and forest activities to the green and inclusive growth.

Considering the various experiences of its members and regarding the specific responsibilities indicated above, the FECOF would like to set out the main requirements for an effective, efficient, and relevant implementation of the European nature laws.

The FECOF especially supports the main objective of the fitness check aiming at “making the European nature laws simpler and less costly”.

Considering the aim of “making EU nature laws simpler”, the FECOF asserts that:

- It would be inefficient to revise the directives while the Natura 2000 network has not been completed in all Member States. The priority must be to achieve a comprehensive and coherent system within the 28 Members States.
- It would be relevant to promote a bottom-up approach through governance process led by the local authorities who are liable regarding the need of information and consultation of stakeholders, in particular forest owners and managers.
- It would be preferable to foster a more flexible approach of the biodiversity conservation in the Natura 2000 network (rather than the current static approach) by taking into account external causes of the loss of biodiversity such as climate changes (with storms and fires), transport, energy and buildings infrastructures....
- It is also necessary to recognize that rural activities such as sustainable forest management and agroforestry are the source of many habitats and species of the Natura 2000 network. Thus, rural actors should be better heard when decisions concern their territories.
- On the scale of forest sites, it would be relevant to foster a better integration of the European nature laws in the framework of the forest laws headed by national or regional authorities. Such an approach could foster the consistency between the biodiversity conservation and the other economic and social goals of forests. Measures in favor of biodiversity could thus be better embedded into regular sustainable forest management practises. Under this aspect, FECOF recommends to stick to forest management plans, or their equivalent, as the reference regulatory tool for the management of the Natura 2000 forest sites.

Considering the aim of “making the EU nature laws cost effective”, the FECOF asserts that implementation of the Natura 2000 directives induces extra costs and loss of incomes for forest municipalities:

- Administrative burdens are incurred at all stages of the implementation, from the elaboration to the management of the forest sites.
- Extra costs are caused by various limitations of the forest activities imposing beyond the legal framework of the sustainable forest management.
- Losses of taxes are also deplored in case of exemptions of land taxes established by the responsible authorities of the directives implementation (like in France).

Those extra costs and losses of incomes affect the profitability of forest activities as well as the balance of the forest municipalities’ budgets, especially in rural territories.

Considering the priority area “protecting forests and enhancing ecosystem services” of the multi-annual implementation plan of the EU Forest Strategy, the FECOF supports the objective of fostering innovative mechanisms for the payment of ecosystem services.

Furthermore, the FECOF asks for a comprehensive revision of the system of funding in forest sites in order to ensure the compensation of extra costs and losses of incomes incurred by forest owners, managers, public and private companies, especially small and medium enterprises of the forest sector acting on the sites. This new funding system must be built on a robust economic valuation and an effective political recognition.

These compensations in forest sites could notably be established by:

- Targeted funds from the European rural development policy, like the environmental measures which mainly benefit to agricultural lands.
- Specific funds or taxes developing within the framework of the forest laws implemented by the national or regional authorities in the Member States.

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