

**Opinion of the European Economic and Social Committee on the ‘Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on a new EU forest strategy: for forests and the forest-based sector’**

(COM(2013) 659 final)

(2014/C 451/21)

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On 20 September 2013 the Commission decided to consult the European Economic and Social Committee, under Article 304 of the Treaty on the Functioning of the European Union, on the:

*Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on a new EU forest strategy: for forests and the forest-based sector.*

COM(2013) 659 final.

The Section for Agriculture, Rural Development and the Environment, which was responsible for preparing the Committee’s work on the subject, adopted its opinion on 19 June 2014.

At its 500th plenary session on 9 and 10 July 2014 (meeting of 10 July), the European Economic and Social Committee adopted the following opinion by 111 votes in favour with 5 abstentions.

## **1. Conclusions and recommendations**

1.1 The EESC welcomes the new EU Forest Strategy (EUFS) and the two accompanying Commission staff working documents. Against the backdrop of growing demands on and threats to forests, as well as many EU sectoral policies and associated rules affecting forestry and forests, the new strategy is sorely needed. The EESC therefore urges both the Commission and the Member States to ensure that the strategy is effectively and efficiently implemented.

1.2 In this context, the Committee reminds the Commission that the Treaty on the Functioning of the EU makes no reference to a common EU forest policy and that controlling forest policies should remain in the hands of the Member States.

1.3 The Committee supports the holistic and balanced approach between the three pillars of sustainability (economic, environmental and social), highlighted by the three overarching headings in the EU Forest Strategy, subdivided into a total of eight priorities. The EESC believes that the strategic orientations provided for each priority should be used to ensure that the strategy is implemented swiftly.

1.4 Given the great importance of forests for the development of rural areas and in order to achieve the goals set out in the strategy, the EESC calls for rural development programmes to include forestry-related measures, and for promoting these measures, in order to ensure a higher uptake of available funds.

1.5 In response to the growing needs of the workforce due to increasing levels of mechanisation along the forestry value chain and in response to the challenges of a changing climate and environment, the EESC highlights the need to promote education, training and knowledge transfer at all levels of the forest sector. In this context, the Committee also calls on the Commission and the Member States to instigate research on improving the forestry sector’s employment potential and working conditions.

1.6 The EESC believes that the discussion on Sustainable Forest Management Criteria, regardless of the end use of wood, should be based on the widely recognised and accepted criteria and indicators formulated during the FOREST EUROPE <sup>(1)</sup> process and should also take into account Member States' particular characteristics and existing systems and legislation on forests.

1.7 With regard to principles for prioritising the uses of wood, the Committee dismisses any legally-binding rules and supports an open market-based approach and the freedom of market participants.

1.8 To address the challenges posed by climate change, the EESC encourages Member States to cooperate across borders and supports calls to make European forests more adaptable and resilient, including fire prevention and other adaptive solutions to protect against natural hazards. Appropriate efforts should focus on the resilience and multifunctionality of forests.

1.9 The EESC supports the use of forest management plans, but underlines that they should continue to be used on a voluntary basis and kept clearly separate from the Natura 2000 management plans to avoid unnecessary costs and red tape.

1.10 An improved knowledge base is the key to understanding the myriad challenges confronting the forest sector. The EESC therefore considers it necessary to work towards the harmonisation of data and more effective information sharing and transparency, whilst at the same time respecting property rights.

1.11 The EESC supports the promotion of wood and other forest materials including cork as a domestic, sustainable, renewable, climate and environment-friendly raw material and is convinced that the forest sector must play a key role in the success of a future bioeconomy.

1.12 With the aim of fostering the competitiveness of the forest sector, the EESC underlines the importance of making best possible use of current and future funding opportunities to support research and innovation, and highlights the role of initiatives such as the European Innovation Partnership (EIP) <sup>(2)</sup> or the Public Private Partnership (PPP) on bio-based industries <sup>(3)</sup>.

1.13 Given the great potential and the numerous benefits of using wood-based biomass for a green economy, the EESC encourages the Commission and the Member States to actively seek ways to promote active forest management and improved wood use in pursuit of the 2020 targets <sup>(4)</sup>, while acknowledging the boundaries of sustainability.

1.14 The Committee calls on the Commission and the Member States to increase efforts to assess ecosystem services and foster a market for them. The Member States should take coordinated action and create compensation mechanisms in response to the currently existing market failures.

1.15 Strong coordination and communication with all relevant interest groups will be required to successfully develop and follow up on the EU Forest Strategy. The EESC therefore underlines the importance of ensuring and increasing stakeholder participation, which will require relevant civil dialogue groups such as the Advisory Committee on Forestry to be strengthened. Consideration should also be given to creating ad hoc groups including EESC and CoR representatives.

1.16 The EESC urges the Commission, the EU Member States and all other relevant players to resume the negotiations and ultimately to reach consensus on a legally-binding agreement on forests in Europe. Together with the EU Forest Strategy, the LBA would represent a key tool for strengthening the forest sector as a whole. Clear definitions and targets for sustainable forest management on a pan-European level would also have an impact across the globe.

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<sup>(1)</sup> FOREST EUROPE Intergovernmental Negotiating Committee for a Legally Binding Agreement on Forests in Europe; refer also to <http://www.forestnegotiations.org/>

<sup>(2)</sup> In context of forestry and forests the following EIPs are of relevance:  
EIP on Agricultural Productivity and Sustainability: [http://ec.europa.eu/agriculture/eip/index\\_en.htm](http://ec.europa.eu/agriculture/eip/index_en.htm)  
EIP on Raw Materials: <https://ec.europa.eu/eip/raw-materials/en>  
EIP on Water: <http://ec.europa.eu/environment/water/innovationpartnership/>

<sup>(3)</sup> Refer to <http://bridge2020.eu>

<sup>(4)</sup> <http://ec.europa.eu/europe2020/targets/eu-targets/>

1.17 Finally, the EESC will follow and engage with all ongoing and upcoming initiatives based on the EU Forest Strategy or other related documents, including Commission staff working documents.

## 2. Introduction

2.1 Forests and other wooded areas account for more than 40 % of Europe's land mass, and their extraordinary importance is undisputed. There are major differences in the resources, structure, management and use of forests between the regions. Overall, European forest cover is on an upward trend, increasing by around 0,4 % per year over recent decades, and the situation regarding growing stock is also positive, with only around 60-70 % of the annual increment being felled. Around 60 % of woodland is in private hands, while the remainder is publicly owned.

2.2 Across the EU and particularly in heavily forested regions, there is considerable emphasis on multifunctionality, as forests serve social and environmental purposes as well as economic ones. They provide a habitat for animals and plants and have an important role to play in mitigating climate change and in providing other ecosystem services, including hunting, forest fruits or human health, recreation or tourism. Forests are also important in socioeconomic terms, but this is often underestimated. Forestry and related industries provide jobs for more than three million people and are crucial to rural wellbeing and employment.

2.3 Sustainable forestry is not a new idea. The concept of sustainable management originated in the forestry sector 300 years ago; since then, this approach of responsible management has constantly been further developed, and has gradually spread to all branches of the economy. The basic definition of sustainable forest management set out in the 1993 Helsinki Resolution of the Ministerial Conference on the Protection of Forests in Europe was a milestone in this process, and places the principle of sustainability in a global context.

2.4 The European Union has had a strategy for the forestry sector for 15 years now. On the basis of a European Parliament resolution <sup>(5)</sup>, the European Commission published a communication <sup>(6)</sup> implementing this policy guidance in 1998.

2.5 At the Council's request <sup>(7)</sup>, in spring 2005 the Commission published a report on the implementation of the forestry strategy <sup>(8)</sup>, which was then complemented by the development of an EU forest action plan covering a five-year period from 2007 to 2011 <sup>(9)</sup>.

2.6 The ex post-evaluation of the action plan (which served as a means of implementing the 1998 forestry strategy) was undertaken in parallel with the 2011 International Year of Forests.

2.7 Although the Treaty on the Functioning of the EU makes no reference to a common EU forest policy, many sectoral policies and associated rules concerning, for example, energy supply or environmental and climate issues are resulting in the de facto development of a common EU forestry policy. The European Commission published its communication on a new EU forest strategy on 20 September 2013, as a response to the ever-increasing and sometimes conflicting challenges facing forests and the forest-based sector and to the need for a more coherent and consistent policy.

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<sup>(5)</sup> OJ C 55, 24.2.1997, p. 22.

<sup>(6)</sup> COM(1998) 649 final, 18.11.1998.

<sup>(7)</sup> Council Resolution, OJ C 56, 26.2.1999, p. 1, and Council conclusions on an EU Forest Action Plan, 2662nd meeting of the Agriculture and Fisheries Council, 30—31 May 2005.

<sup>(8)</sup> COM(2005) 84 final, 10.3.2005.

<sup>(9)</sup> COM(2006) 302 final, 15.6.2006.

### 3. Outline of the new forest strategy

3.1 The Commission's basic document is accompanied by two additional, more detailed Commission staff working documents, the first focussing on the process, analysis and way forward proposed by the strategy, and the second providing detailed insight into the EU's forest-based industries, i.e. woodworking, furniture, pulp and paper manufacturing and conversion, as well as printing <sup>(10)</sup>. Given their complementary character and importance, the accompanying documents should receive careful consideration. All current and future initiatives based on the EU Forest Strategy or other related documents should be followed and engaged with by the EESC.

3.2 The Commission has chosen to present the strategy's future areas for action under three overarching headings, subdivided into a total of eight priorities.

3.3 The 'strategic orientations' provided for each of the eight priorities ensure that the strategy also essentially lives up to the requirement to propose tangible measures and not just make general statements of intent.

3.4 To enable rapid implementation of the new forest strategy the Commission has not proposed drafting a separate new action plan. Instead, the strategy contains a list of specific measures designed to meet its objectives.

3.5 The new forest strategy was published following the final evaluation of the previous strategy, and not long before the start of the next EU programming period and the multiannual financial framework for 2014-2020.

3.6 The economic and political environment in the EU has altered drastically since the previous strategy was published in 1998. Not least in terms of international commitments, the new strategy is embedded in a completely new regulatory framework.

3.7 The Commission published the new forest strategy to coincide with the negotiations by the FOREST EUROPE Intergovernmental Negotiating Committee to adopt a legally binding agreement on forests in Europe <sup>(11)</sup>. If implemented, this agreement would replace the current recommendations, and would include clear definitions and targets for sustainable forest management to be adopted by the signatory States.

3.8 The EESC has supported several processes relevant to forestry (see Appendix 1), including the new forest strategy from its inception <sup>(12)</sup>, by making recommendations. When the Commission's implementation report was published in 2005, the Committee took the opportunity to produce a comprehensive opinion on the role of forests and forestry in a changed environment. The present opinion serves in part to update the Committee's previous opinion in the light of future challenges.

### 4. General comments on the new forest strategy

4.1 The strategy is based on the fact that the Treaty on the Functioning of the EU makes no reference to a common EU forest policy and thus, the control over forestry policies remains with the Member States. The strategy is also holistic, balancing the economic, social and environmental aspects of sustainable forestry and including the processing industry alongside forests and forestry.

4.2 The strategy emphasises sustainable forest management and multifunctionality, which produces a range of products and services in a balanced way and ensures that forests are protected. At present, only slightly more than 60 % of annual forest growth is felled in the EU; the aim of the strategy is therefore to promote forest-based employment and prosperity in Europe by making the forestry sector more competitive and use of wood more versatile as part of efforts to build a bioeconomy based on renewable raw materials.

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<sup>(10)</sup> SWD(2013) 342 and 343 final, *A blueprint for the EU forest-based industries*, 20.9.2013.

<sup>(11)</sup> For the current negotiating text, see <http://www.forestnegotiations.org/INC/ResINC4/documents>

<sup>(12)</sup> Opinion on the 1998 forestry strategy, CESE 1138/99, NAT/034, OJ C 51, 23.2.2000, p. 97-104; opinion on reporting on the implementation of the EU forestry strategy, CESE 1252/2005, NAT/278, OJ C 28, 3.2.2006, p. 57-65.

4.3 The new strategy represents a holistic approach and an attempt to improve the coordination of forestry in the EU, promoting efficient and effective implementation and endeavouring to avoid pointless red tape and to strengthen the performance of forests and forestry in the EU.

4.4 Forestry and the forest-based processing industry can make a real contribution to the success of the Europe 2020 strategy. However, achieving this means closely linking the forest strategy with pursuing the aims of Europe 2020 by promoting efficient and effective implementation of the former in all relevant policy areas.

4.5 Evaluation of the latest data about the implementation of forestry measures by the Member States under rural development has shown that rural policy instruments were not fully exploited. In order to better achieve the goals set out in the forest strategy, the strategy urges the Member States to give proper weight to forest-related measures in programming and implementation. This is particularly necessary with a view to increasing the involvement and mobilisation of the myriad small family holdings and privately-owned forests, and could be supported by simplifying procedures and cutting red tape.

4.6 In future, the intention is to support the strategy's objectives using the measures and instruments contained in the rural development regulation's forestry package <sup>(13)</sup>.

4.7 The strategy encourages the Member States to develop, in cooperation with the social partners, measures to make better use of the sector's employment potential, to improve the skills of people working in it, and to further improve working conditions. New, targeted research should begin on the workforce employed in European forests, for example in road construction, planting, forest maintenance, harvesting, extraction, transport, information services and environmental services. Overall, the Member States' policies and programmes should help to improve the competitiveness of forestry and the entire forest-based sector, in order to generate growth and jobs over the long term.

4.8 The strategy highlights the versatile role of forests in helping to achieve climate and energy targets. The achievement of these targets can be supported through the active management and use of forests, which would result in better forest growth and carbon sequestration and make it possible to substitute fossil-based energy sources and materials with renewable wood.

4.9 The strategy recognises that forests and their ecosystems require special protection as a result of climate change and other external threats.

4.10 The strategy recognises the importance of improving public information about forests and forestry and about wood as a renewable raw material. This should be supported by targeted campaigns by the Commission and Member States aimed at raising public awareness of the role that forests play for our society and vice versa.

## 5. Specific comments

5.1 The strategy underlines the fact that wood is a sustainable, renewable, climate- and environment-friendly raw material with a wide variety of possible uses. Resource- and energy-efficient and environmentally responsible processes and products contribute to the competitiveness of the forest sector and will, in particular, play a greater role in the EU bioeconomy. This will increase demand and thus the need for increased, sustainable wood mobilisation. It is deemed necessary to re-assess potential wood supply, e.g. via mapping forest ownership structures, and the question of facilitating increased sustainable wood mobilisation. Appropriate solutions for increasing wood mobilisation should be developed in consultation with the entire forestry value chain.

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<sup>(13)</sup> See recital 25 of the EAFRD Regulation, R 1305/2013.

5.2 The strategy requires the Commission to formulate principles for prioritising the uses of wood in cooperation with the Member States and stakeholders. However, legally binding rules on the hierarchy of forest biomass use, defining which wood uses are to be given priority, would clearly be contrary to the open market economy and the freedom of market participants.

5.3 As stated in the strategy, in 2014 the Commission will, together with the Member States, launch a cumulative cost assessment of EU legislation affecting value chains in the forest-based industry. As this is of crucial importance for the entire forest sector, all stakeholders in the forest value chain should be involved in the assessment, ensuring a comprehensive and complete picture of the sector and a coherent approach.

5.4 Forests host a large amount of biodiversity and, as well as wood and various other forest products as a raw material (e.g. cork), they provide a variety of ecosystem services on which rural and urban communities depend. Changes to conditions due, for example, to climate change, the spread of invasive alien species, water scarcity, fires, storms and pests increase the pressure on forests and the risk of natural hazards. Appropriate protection efforts should focus on the resilience and multifunctionality of forests.

5.5 The strategy sets out the objective of ensuring and achieving a balance between sustainable management and the various functions of forests by 2020. In this context, the EU should do more to evaluate ecosystem services and create a market for them. To ensure that such a market can operate more effectively, coordinated Member State mechanisms are needed in response to the currently existing market failures, for example ensuring that landowners receive appropriate compensation in exchange for accepting the restrictions needed to protect ecosystem services.

5.6 Besides wood for timber and energy, there are various other products forests provide, that are given little attention in the strategy. Cork production, for example, is very important in the Mediterranean in particular and has several advantages: it is a natural product made of renewable sources, following an environment-friendly process that does not require the complete harvesting of the trees. The cork industry demonstrates its importance by contributing significantly to job creation while maintaining the ecological stability of the fragile and endangered Mediterranean ecosystem.

5.7 The development and implementation of forest management plans are founded on the principle of sustainability and on good practice. The strategy contains a proposal to include biodiversity considerations, such as Natura 2000 conservation objectives, in forest management plans. Linking forest management plans, which serve as operational planning tools for forest owners, with Natura 2000 management plans, which serve as public planning tools at local authority level, would blur the lines between planning levels and responsibilities. In addition, this would considerably increase the bureaucracy and associated costs of developing a forest management plan.

5.8 The increasing frequency of extreme weather events, as harbingers of climate change, also necessitates an active approach to Europe's forests. The Commission aims to maintain and enhance the resilience and adaptability of Europe's forests. Forest reproductive material of tree species and artificial hybrids which are important for forestry purposes should therefore not only be genetically suited to conditions and of high quality, but also make a sustainable contribution to conserving biodiversity.

5.9 In the strategy the Commission calls for a framework for action to be drawn up to prevent, minimise and mitigate the adverse impacts of invasive alien species on biodiversity and ecosystem services. Such action should also address social and economic damage. However, a holistic and science-based approach should also be taken when prioritising invasive alien species, based on stringent listing criteria. Alien forest reproductive material that does not spread invasively and has no negative impact on the new location should therefore not be included, as — particularly in the light of climate change — it may make a positive contribution to the current and future supply of raw materials and other ecosystem services.

5.10 Under the strategy the Commission is to draw up, with the help of the Member States and stakeholders, a list of sustainable forest management criteria that could be applied regardless of the end use of wood. When formulating the criteria, sustainable forest management is to be considered holistically, regardless of the end use of wood. The criteria should be based on existing sustainable forest management criteria, indicators and principles, such as those framed under FOREST EUROPE, where sustainability is considered from a national and regional point of view. The criteria should also take into account Member States' particular characteristics and existing national legislation on forests.

5.11 The strategy proposes that the relevant interest groups should also continue to be involved in the development and implementation of the forest strategy. Tried-and-tested bodies such as the Advisory Committee on Forestry and Cork and the Advisory Committee on Forest-based Industries should also be included in the platform for future stakeholder cooperation with the Commission. With regard to implementation, forest-related issues and progress on implementing the forest strategy should be regularly addressed by these groups. Where needed, the creation of ad hoc groups including EESC and CoR representatives may also be worth considering.

Brussels, 10 July 2014,

*The President*  
*of the European Economic and Social Committee*  
Henri MALOSSE

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