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(Action Forêt Reply to Consultation on Forest and CC 2010 - EN)

## **Public Consultation on the Green Paper on “forest protection and information in the EU: Preparing forests for climate change”**

### **Question 1**

**Do you think maintaining, balancing and enhancing forest functions should be given more attention?**

There are many reasons justifying the public authorities to give more attention to the forests in Europe.

Firstly, forests functions are widespread and diverse.

- o Forests have socio-economic functions. They provide job opportunities in rural areas particularly sensible to desertification and raw material for many industries; the presence of forests is a structuring factor for land planning and the human presence in remote areas.
- o Forests are environmental functions. They are a key element to retain bio-diversity and stability of the eco-systems, they play an essential role in the climate regulation.

Secondly , as the Commission states itself, forests and other wooded land represent approximately 40% of the European Union land area.

Therefore it is crucial that this important part of the European territory benefits from a sustained commitment of all the stakeholders to improve the contribution of forests to the health and wealth of the European citizens.

**If so, on what level should action be taken, EU, national and/or other?**

Competence for forest policy lies primarily with the Member States. Moreover, the management of forested areas differs quite fundamentally between northern/central European and southern European countries, which is mainly due to the composition of forested areas, management techniques and diversity of species. This diversity has a significant impact on

forest management and downstream economic activities, including the exploitation and industrial use of timber. This difference in management of forested areas is also due to diverging traditional customs and practices.

Although the implementation of the principle of subsidiarity is very much relevant on this matter, the harmonisation of some aspects of national forestry policies at European level could be aimed if it proved to be useful for both the environment and the stakeholders.

In this context, many options remain open as regards the policy instrument to be used to foster an EU-wide initiative, from open method of coordination to a framework directive. However, the rationale should be a minimum set of common objectives at European level with flexible implementation in the Member States.

### How should it be done?

The Commission could, for example, further develop its current measures namely:

- o monitoring and possibly reporting on the state of EU forests,
- o anticipating global trends and drawing Member States attention to emerging challenges and,
- o proposing and possibly coordinating or supporting options for early action at European scale.

CEETTAR believes that the Commission should foster the consultation process of all the stakeholders in the preparatory and implementation phases of any new community initiatives. The forestry contractors have become with time a key part of the production chain in the forest management for both the enhancement of the socio-economic value and the protection of the environmental characteristics of the forest.

### Question 2

To what extent are EU forests and the forest sector ready to address the nature and magnitude of the challenges posed by climate change?

Forestry contractors are directly concerned by the consequences of climate change on the natural dynamic of the forest and they already try to bring solutions, for instance with regard to pest and disease occurrence and weather-related events such as fires and storms, in order to guarantee the sustainability of forests, which climate change is interacting with.

Forestry contractors are not only the partners of forest owners, local authorities in order to enhance the economic production of the forest, they have also a increasing role guaranteeing the sustainability of the forests; they maintain the capacity of organic production and the health of the forest, the biodiversity of species, the soil protection and the water; these are all activities made and improved by entrepreneurs which provide expertise and high level of technical skills.

Forestry contractors are looking forward to contributing to European initiatives as a supplementary development of their existing commitment in favour of the sustainability of the forest.

Do you consider particular regions, certain countries more exposed/vulnerable to the effects of climate change? What sources of information would you base your answer on?

Considering the great diversity of the forest types across the continent, the threats from climate change will vary from a region and forest ecosystems will respond in a variety of ways. It is therefore essential to keep considering forest in Europe as a whole, in order to not underestimate or overestimate the consequences of climate change on certain areas.

Would you see a need for EU-level early action to ensure all forest functions are maintained?

As stated in the reply to the question 1(2), competence for forest policy lies primarily with the Member States. Therefore any measures taken at European level will have to be complemented by a flexible implementation in the Member States (reflecting the different environmental and socio-economic conditions in the Member States).

How could the EU contribute to add value to the respective efforts of Member States?

Any initiative of the European Union supporting the positive measures taken in the Member States is welcomed. The EU has obviously a role to play at least in collecting and disseminate adequate forest information, monitoring the state of forest and the threats affecting them, providing a support to sustainable forest management actions with respect to their social, ecological, and economic importance as well as enhancing forest adaptation towards climate change and the mitigation of climate change.

### Question 3

Do you consider that EU and Member States policies are sufficient to ensure that the EU contributes to forest protection, including preparing forests for climate change and conserving biodiversity in forests?

Whatever the quality of the current policies, one should always call for their improvement and the strengthening of the cooperation and coordination in the EU on sustainable forest management, including forest protection.

As stated in the reply to the question 1(3), a future role for the EU could indeed aim at enhancing forest adaptation towards climate change and the mitigation of climate change, to contribute to their sustainability.

In what areas, if any, do you think further action may be necessary? How might this be organized, under the given policy framework or beyond?

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to sustainable forest management actions with respect to their social, ecological, and economic importance as well as enhancing forest adaptation towards climate change and the mitigation of climate change.

As explained in the reply to question 1(2), many options remain open as regards the policy instrument to be used to foster an EU-wide initiative, from open method of coordination to a framework directive. However the rationale should be a minimum set of common objectives at European level with flexible implementation in the Member States.

#### Question 4

How could the practical implementation of Sustainable Forest Management be updated in order to upkeep the productive and protective functions of forests and overall viability of forestry, as well as enhance the resilience of EU forests in view of climate change and biodiversity loss?

CEETTAR believes that Sustainable Forest Management (SFM) should further develop the existing measures (as regards e.g. afforestation, fire prevention, preservation of endemic genetic resources...). The commission should consider the potential benefits for SFM of an improved coordination of the different EU policies (including as appropriate in relation to existing financial instruments such as under rural development policy, LIFE+) and the positive impact of the further development of sustainable agriculture.

Eventually, the significant role of all the forest contractors in the practical implementation of the Sustainable Forest Management should be recognised and their contribution to the elaboration of new EU initiatives facilitated.

What steps are required to ensure that the gene pool in forest reproductive material can be successfully conserved in its diversity and adapted to climate change?

Ensuring the regeneration of our forest heritage is certainly an essential part of the sustainable development of forested areas. Genetic improvement is the starting point for the timber sector, the objective of which is to ensure the long-term exploitation of all forests. The maximum added value of the ligneous material, both in terms of the timber's structure and its annual growth rate, can be determined through research using high quality clones and the recommended diffusion of genetic material.

The seed bank or forest seed bank provides nurserymen and public/private forest owners with genetic material. It is vital that the harvested seeds are of premium quality, not only in order to guarantee the rapid growth of species, but also genetic diversity; in this way, it will be possible to guarantee the survival of forest species, particularly in the context of the current climate changes.

It is therefore important that seeds are harvested on land that provides the best provenances.

#### Question 5

