

EUROPEAN LANDOWNERS ORGANISATION

EUROPEAN POLICY GROUP

EUROPEAN FORESTRY POLICY

Introduction

The European Landowners Organisation (ELO) exists to contribute to the policies of the European Union in promoting a prosperous and attractive countryside and to ensure that private land ownership can continue to make a positive contribution to the economy and environmental management of rural areas. The ELO's constituent organisations in Austria, Belgium, Denmark, England and Wales, Finland, France, Germany, Greece, Italy, Netherlands, Portugal, Scotland, Spain and Sweden, represent the interests of millions of landowners throughout Europe.

Forestry is an important component of the businesses of many rural landowners. Forestry and woodlands provide jobs and income to many within the European Union and also provide a valuable environmental asset. A sensible and sound policy for forestry is vital to the long term interests of the forest owners. This paper represents the views of the ELO and we would welcome consultation during any discussions on EU forest policy.

The Goals

The goals of forestry policy should relate to the dual functions of the forest as an economic resource in the management of the forest owner and a stock or supply of potential social and environmental attributes for the wider population. These attributes are inter-related since the environmental and social benefits of forestry, in most cases, depend upon its economic role and the benefits accruing to forest owners and managers.

Therefore, the following goals reflect the ELO view on private forestry:

EU Forestry Policy should be framework in nature with the following goals:

- (i) to promote the economic role of private forestry by ensuring security of property rights and ensuring that owners have the freedom to manage their forests appropriately while having due regard to the environment, and
- (ii) to establish mechanisms for forest owners to meet the demands from the wider population for social and environmental benefits from forestry by the achievement of

(i) and by allowing Member States to provide appropriate incentives to forest owners as indicated by national circumstances and needs.

The Means

(i) Ownership

Forestry policy must respect existing property rights and the aspirations of private forest owners in terms of management, asset disposal and inheritance. The ELO recognises that demands may be placed on these rights and aspirations by Member States for wider public benefit. However, the ELO urge the EU to ensure that Member States use the incentives route and that regulation is used only as a last resort. Where regulation is used, it must not be onerous to the point that owners are unable to meet their private objectives in respect of the forests they own and losses should be met with appropriate compensation. In practice, there will be some relationship between the level of regulation and the compensation paid.

(ii) The Market Economy

The ELO sees no justification for an EU market support policy for commercial forestry. Apart from the incentives required for goal (ii) there should be no EU subsidies or price support for the production cycle itself. Owners should be given complete freedom in the management of their commercial assets from planting through to harvest.

However, the EU must ensure that the rules of free competition, in respect of forestry products, are adhered to amongst EU Member States and that EU production is not subject to unfair competition from production in non-EU Member States.

As part of the free market strategy for forestry, landowners must also have the freedom to develop other businesses which are related to forestry such as hunting, fishing and other sports or recreational activities. There is a tendency in some Member States towards extending the Scandinavian - especially the Swedish - policy of allowing free public access to private land. The ELO opposes this policy direction as experience indicates that free public access restricts the ability of the private owner to manage his forests appropriately and to gain an income from any forest related activities including game management. Such income may play a large role in the viability of the forest as a productive resource.

Apart from the economic arguments, free public access is often incompatible with nature conservation objectives. There may also be an imbalance in the impact with private forests near to urban centres suffering considerably more pressure from public access than those in remote rural locations. All these factors - economic, environmental and social - underline the conclusion that the EU should resist any move to impose public access rights to private forests. However, public access and recreation in private forests could be promoted by Member States, through incentives and with the agreement of landowners, in appropriate locations.

Special Issues

(i) Other EU concerns

Consistent with the goals outlined above, EU framework forestry policy might also address the following issues:

- (a) the collection of statistical data and research about environmental matters such as the biology of forests, environmental damage to forestry (including acid rain) and the role of forests in the protecting and enhancing the environment,
- (b) the protection of forests against pests and diseases,
- (c) the co-ordination of EU forestry policy with EU policy in other areas (including regional, social and environmental policies).

(ii) Certification of forests and timber

Individual Member States have developed their own legal frameworks and environmental safeguards within which forestry must operate. These take into account the conditions prevailing in each individual Member State. The ELO supports the objective to source timber and wood products from soundly managed forests. This is the proper responsibility of Member State Governments which have the necessary legal powers, expert personnel and financial resources to operate a consistent procedure. In carrying out this function, Member States should take into account the principles of sustainable development which are currently being discussed and agreed at an international level. With this as the aim, the ELO does not see the need for a further level of certification or accreditation carried out by independent, non statutory agencies.

The EU should not promote any certification scheme which does not meet the guidelines set out above. The ELO is greatly concerned about the under management of a large proportion of European Forests and wishes to ensure that disincentives to woodland management are minimised. The introduction of independent accreditation on top of national systems already used by Member States can only add to the regulatory burden faced by forest owners which will discourage them even more from managing their woodlands.

(iii) Hunting, fishing and game management

Hunting, fishing and game management are activities of increasing value to forest owners and rural communities through income and job creation. The right of individual landowners to choose whether or not to engage in these activities on their land is coming under threat in some Member States. The ELO believes that this freedom of choice should be protected. It is vitally important to maintain the balance of game conservation and forest production.

(iv) Forestry and the environment

Change is the natural order and forests are exposed to constant change. In most respects, forestry can be conducted with respect to ecological and landscape concerns. However, in some instances there may be conflicts. In these circumstances proper regard should be given to the economic role of forestry in that there are important economic benefits both to the landowner and the wider community. Any overall policy should be careful to balance the interests of production, environment and wider social concerns - in essence this is sustainable development. There is no justification for necessarily valuing the environment more highly than economic or social concerns.

Where conflicts occur and when decisions are made to favour the environmental argument, Member States should follow the principle of "incentive first" and "regulation last". When the regulatory route is chosen, an absolute condition should be that owners upon whom land use and economic restrictions are placed receive full compensation. This respects the notion of equity in society by ensuring that environmental concerns are met while, at the same time, owners face no economic loss.

Conclusion

The EU should not develop a Common Policy on Forestry. Such a Common Policy would impinge upon the extent to which Member States exercise subsidiarity in developing their own policies, which, in terms of practical effect, are more effective and less costly.

**ELO POLICY GROUP
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**Any comments or queries on this submission should be
addressed to the Chairman of the ELO Policy Group
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