# **The case of Mainland Finland**

### Funding forests into the future?

How the European Fund for Rural Development affects Europe's forests



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### Acronyms

EAFRD	European Agricultural Fund for Rural Development
EU	European Union
FANC	Finnish Association for Nature Conservation
FLEGT	Forest Law Enforcement, Governance and Trade
ha	hectares
LFA	Less Favoured Areas
METSO	Southern Finland Forest Conservation Programme
MoAF	Ministry of Agriculture and Forestry
NFP	National Forest Programme
NGO	Non-Governmental Organisation
RD	Rural Development
RDP	Rural Development Programme
SME	Small to Medium-Size Enterprise
WG	Working Group

#### 1 Background

#### 1.1 Finland is a forest

The forests of Finland cover 26.3 million hectares (ha), or more than 85 per cent of the entire landmass. Forest land constitutes 20.2 million ha of this land, while the rest includes scrubland (2.8 million hectares), wasteland (3.1 million ha) and other forestry land (0.2 million ha). The largest proportion of forests in Finland is made up of managed forests, and only 4.6 per cent of forest land is strictly protected (Finnish Statistical Yearbook of Forestry, 2006). Most protected forests consist of state-owned scrubland in North and East Finland. About 1,077,000 ha consist of forestland or bog woodland in the Natura 2000 sites. Not all of this is strictly protected, and part of this is scrubland (Ministry of the Environment, 2008). Most of the strictly protected forests are in Natura 2000 sites, but not all. Across Finland, conifers are the most dominant tree species: pine (13.3 million ha) and spruce (4.7 million ha). Half of all forestry land, 13.7 million ha, is privately owned by individuals. Most of these forests are in the south of Finland. The state owns nearly as much, 9.1 million ha; companies own 2.1 million ha; while the rest, 1.4 million ha, is owned by other bodies (the Church, municipalities etc.)

#### 1.2 Environmental challenges in the countryside

Over 90 per cent of Finland's area can be classified as rural (RDP for Mainland Finland, 2007, p. 4). The most serious environmental problems in Finland's rural areas are biodiversity loss and high nutrient flow from agriculture (and forestry) to rivers, lakes and the Baltic Sea, which causes eutrophication and harmful algal blooms which makes the water impossible to drink or swim in.

According to the Assessment of the Finnish Biodiversity Programme (Hildén et al., 2005), the loss of biodiversity is still going on in Finland; and Finland will not reach the EU's target to stop biodiversity loss by 2010. To protect and enhance biodiversity, forests and thus forestry play an important role. Forests are the most important habitat type for endangered species in Finland, with 37.5 per cent of endangered species living mainly in forests. However, in the south of Finland only 3.6 per cent of the forests are protected (METSO Working Group, 2008, p. 8). Traditional rural habitats are the second most important habitat type for endangered species living in meadows and other agriculture habitats (RDP for Mainland Finland, 2007, p. 26).

As stated above, the other major environmental problem in Finland is the nutrient flow from agriculture and forestry to rivers, lakes and the Baltic Sea. At the moment it looks as if Finland will not reach the Water Framework Directive Target 2015, with its target of ensuring the good ecological status of the waters. In the national discussion on the Common Agricultural Policy, this item has been more important than biodiversity. This is because many summers have seen blue algae blossoms appear in the Baltic Sea, which has had a negative impact on (for instance) people taking their holidays in their summer cottages. When the Monitoring Committee for the RDP for Mainland Finland accepted Finnish proposals for changes in the Programme (12 December 2007), the proposals dealt with agro-environmental improvements to water protection, not biodiversity or forests.<sup>1</sup>

#### 1.3 One Finland, two programmes

Finland has one national rural development strategy for 2007–2013 and two Rural Development Programmes (RDPs) for 2007–2013. The RDP for Mainland Finland was accepted by the European

<sup>1</sup> http://www.mmm.fi/fi/index/etusivu/maaseutu\_rakentaminen/ohjelmakausi20072013/muutosesitykset.html

Commission on 10 August 2007, and the programme for the autonomous Åland Islands in December 2007.<sup>2,3</sup> This analysis concentrates on the RDP for Mainland Finland, however, for a variety of reasons: because the final programme of the Åland Islands is not yet available on the internet; because the county is small (only 1,527 km<sup>2</sup>, compared to Finland's total area of 390,920 km<sup>2</sup>; RDP for Mainland Finland, 2007, p. 4); and because forests are not as important for the economy in the Åland Islands as they are on the mainland.

<sup>2</sup> Manner-Suomen maaseudun kehittämisohjelma 2007–13. 2007. CCI 2007 FI 06 RPO 001. Maa-ja metsätalousministeriö 8/2007. ISSN 1238-2531. Annex, and pp.170–171.

Commission press release 20/12/2007, IP/07/1967: Further set of rural development programmes for the period 2007–2013 agreed. In addition the draft for the Åland islands programme is on the internet (in Swedish): http://www. regeringen.ax/naringsavd/jordbruksbyran/LBU\_2006\_2013.pbs

#### 2 Is money from the rural development fund going to forestrelated activities?

The total budget of the Mainland Finland Rural Development Plan is  $\notin$  7,407 million.  $\notin$ 6,625 million will come from public money, of which  $\notin$ 2,062 million is EU financed, via the rural development fund (EAFRD). The rest,  $\notin$ 782 million, will be private money.<sup>4</sup> The Åland Islands programme is small. The total public expenditure is  $\notin$ 56.9 million and the EU contribution via the rural development fund is  $\notin$ 17.5 million (Commission MEMO, 2007).

In Finland most of the rural development funds will go to agriculture and not to forestry activities. It is still unclear how much money will go to forestry, as some measures in the RDP could be used for both, i.e. agriculture and forest-related actions. Unfortunately most of the funds are destined for exclusively agricultural measures, and no specific part appears in the programme for measures directed only towards forests. The final amount of money going to forestry activities will depend on activities of the forestry sector, such as forest centres, and not on actions focusing on sustainable forest practices or biodiversity protection, as the programme does not include anything new or obligatory for enhancing or protecting biodiversity.

One new aspect of the Finnish RDP for 2007–2013 is the focus on bioenergy. This is one of the priorities in the programme. Funds are available for developing bioenergy, both in the agricultural and in the forestry sector. Currently there is a debate in Finland as to how much more biomass can come from the forests to use as bioenergy. The forestry industry is worried that the demand for wood for bioenergy will lead to a rise in prices, and that this will cause competition with other forest products. Environmental NGOs have also observed there is not enough knowledge yet on the environmental impact of taking the stumps. What is known is that when too much biomass is taken out of the forests, there is a definite impact on the ecosystem.

## 2.1 Axis 1: improving the competitiveness of the agricultural and forestry sector

The forestry sector can get funds for measures laid down under Axis 1; there is money for education for landowners, for instance, and money especially for small or medium-size enterprises (SMEs) for marketing new timber products, etc. Axis 1 funds are not supposed to be for forest environment measures. In theory, NGOs could also conduct training projects and receive money for this. In practice these funds are administered by forest centres, so this possibility for more environmentally friendly forestry will not usually be funded via Axis 1 rural development funds. The priority in this axis for forests is bioenergy.

In Finland, the possible lines for forestry are:

- 1. Actions relating to vocational training and information (measure 111)
- 2. Modernisation of agricultural holdings (measure 121)
- 3. Adding value to agricultural and forestry products (measure 123)
- 4. Cooperation for the development of new products, processes and technologies in agriculture and food (measure 124).

<sup>4</sup> Manner-Suomen maaseudun kehittämisohjelma 2007–13. 2007. CCI 2007 FI 06 RPO 001. Maa-ja metsätalousministeriö 8/2007. ISSN 1238-2531. Annex, and pp.170–171.

#### 2.2 Axis 2: forest biodiversity refers to national money

As stated before, one of the main problems of Mainland Finland's RDP is that it includes nothing new and obligatory for biodiversity. Under Axis 2, the axis which could provide funds for improving the environment, Finland is not using the rural development funds for Natura 2000 forest areas, nor for forests outside the Natura 2000 areas.

The RDP refers to national funding for forest conservation, but EU funds (except LIFE+) will not be used for this (RDP for Mainland Finland, 2007, p. 28-29, 63). Unfortunately, national funding sources are inadequate for the amount of money needed to develop Natura 2000 management plans and other conservation purposes. There is a funding programme for existing national nature conservation programmes and for the establishment of the Natura 2000 network for the period 1996–2009 (€ 500 million). However, there is not enough money for the development of management plans of Natura 2000 sites: and this is a serious problem. For example, about 100,000 ha of forest areas is not protected by the Nature Conservation Act. They fall under the weaker Forest Act, the Land use and Building Act or the Extractable Land Resources Act. Yet it is precisely these forest areas which are most in need of special management plans, because without proper inventories of habitats and species, and without guidance, any logging threatens the biodiversity conservation values in these areas.

The Finnish national budget for 2008 allocates money from the Ministry of the Environment to Metsähallitus (the former Forest and Parks Service) to create thirty Natura 2000 management plans in 2008 (National Budget Proposal, 2007, p. 660). This is not a large number, if you consider that Finland has 1,858 Natura 2000 sites, amounting to a total of 4.9 million ha (Ministry of the Environment, 2008). Finland has a Sustainable Forestry Financing Act, managed by the Ministry of Agriculture and Forestry, but this act does little to solve this problem. The proposal in the national budget 2008 is to spend  $\in$  6.9 million on environmental measures in private forests. With this money, only 4,800 ha of the total amount of 26.3 million ha of forests can be supported for implementing greener forestry practices in Finland for 2008. The Natura 2000 management plans are not mentioned in this part of the Finnish national budget (National Budget Proposal, 2007, p. 339).

The most critical problem relates to the financing of the new forest conservation areas in southern Finland. In this part of the country you can find most of Finland's species, but only a few conservation areas. This is still not funded. The national 'METSO II' Working Group estimated, in the final report to the Ministry of Environment (17 December 2007), that the cost of the new conservation programme for 2008–2016 would be in the region of €733.62 million to €1,253.62 million. It is interesting to know that the Working Group proposes to use money from the RDP to cover part of the cost of this conservation programme (METSO Working Group, 2008, pp. 10, 30).

In addition, although there is a clear lack of national funding for forests, no major changes are in preparation. The Ministry of Agriculture and Forestry nominated a new working group to update the ecological part of the RDP on 19 September 2007, but forests are strangely not included in the terms of reference (MoAF Working Group, 2007a).

#### 2.3 Axis 3: Improving quality of life

Axis 3 contains some possibilities for forestry funding: e.g. measures 311 ('Diversification into non-agricultural activities') and 312 ('Creation and development of micro-enterprise'). Both of these measures can be used in forestry and forest bioenergy.

Some NATURA 2000 or other environmental management plans may be financed by measure 323 Conservation and upgrading of rural heritage (RDP for Mainland Finland 2007, p. 72, 203-206, 234). However, this budget line is the smallest one, only 6 million euros (RDP for Mainland Finland 2007, p. 226).

#### 2.4 Axis 4: Leader

Axis 4, Leader, is the most innovative axis. It can also be used for forest biodiversity, but it depends on small local projects: for instance the restoration of some areas that might be suitable for ecotourism. Much depends on interests of Leader action groups and local rural development plans.

# 3 Is the national rural development strategy in line with other programmes?

#### 3.1 The national biodiversity action plan

The new Finnish National Biodiversity Strategy was accepted in December 2007 (Ministry of the Environment, 2007). This strategy highlights forests and traditional rural habitats. However, the RDP 2007–2013 only gives money for traditional rural habitats. That is why Mainland Finland's rural development strategy 2007–2103 is not in line with the Finnish National Biodiversity Strategy.

#### 3.2 The National Forest Programme

The idea of Finland's National Forest Programme 2010 was to strike a balance between forest use and conservation.<sup>5</sup> In practice, however, forestry has already received most of the sums available under the national funding sources of the NFP.

The National Forest Programme also puts an emphasis on bioenergy. This is in line with the national strategy plan for rural development, where bioenergy is the most important issue for forests.

The largest gap between the NFP and the strategy plan for rural development relates to the conservation of the forests of southern Finland. This issue should be included in the national strategy plan for the rural development of Finland, and receive money from the rural development fund. But the rural development strategy and programme do not include any special forest biodiversity measures. In the new special national rural development plan (2007), there is only one forest biodiversity measure: the implementation of the METSO programme (the southern Finland forest conservation programme). The problems are described briefly in the descriptive section of the chapter on the background of the RDP. And that is why Mainland Finland's rural development strategy plan for rural development does not support the national forest programme in a balanced way.

#### 3.3 Others

Landscape is not included in any national or EU nature conservation priorities: but in the Finnish strategy plan for rural development and the RDP, landscape is highlighted over biodiversity because the Government needs reasons for payments for less favoured areas (LFA) by keeping landscape open by farming. In practice, the Finnish LFA amounts to direct payments to farmers.

The protection of forest landscape for example against logging is not included in the RDP. In the countryside, forestry does not even take into account forest areas close to settlements and whether faraway landscapes are visible in the distance (cf. RDP for Mainland Finland 2007, p. 30). According to the Forest Act there is no need for a statement or permission from neighbours before logging. The municipality can claim for softer logging practices only in some planned areas, which are mainly situated in towns but not in the countryside.

In addition, according to rules for Good Agricultural and Environmental Conditions, small groups of trees and bushes as well as patches of rocks located within arable land must be retained in order to preserve the characteristic features of arable environments. They cannot be removed without notifying the municipal rural business authority in advance (RDP for Mainland Finland 2007, p. 77).

5 In English on the internet: http://www.mmm.fi/en/index/frontpage/forests/nfp2010/documents\_reports.html

# 4 Is the Rural Development Programme in line with the national strategy plan for rural development?

There are two national RDPs in Mainland Finland: a general one, 'Elinvoimainen maaseutu – yhteinen vastuumme' for 2005–2008, and a specialised one, 'Elinvoimainen maaseutu – ministeriöiden vastuut ja alueellinen kehittäminen' for 2007–2010. The special programme has € 1 million of national money for innovative pilot projects at the regional and local levels. The special programme is so new, however – it was only adopted in February 2007 – that it has not yet had any direct impact on the overall RDP.

Forest bioenergy has been one of priorities in national rural development strategies for a long time. The implementation of the southern Finland forest conservation programme is the only forest biodiversity measure in the new programme (2007). However, there is also a vision of how ecotourism and 'nature and landscape services' could provide new possibilities for the countryside, and this may provide a basis for a more balanced RDP in the future.

In general, Mainland Finland's RDP is not in conflict with national rural development strategies.<sup>6</sup>

However, there are such great differences between Mainland Finland's RDP and the national strategy plan for the rural development of Finland 2007–2012 that comparisons are difficult. The foreword of the national plan (2007) identifies two main differences:

- 1. The RDP is based on EU money, while the national strategy plan is funded by domestic money; 'only 13 per cent of RDP money is spent on the policy sector of rural development'
- 2. The domestic plan is much wider, and also contains chapters on infrastructure, health etc. In addition, the national plan comprises a long list of things what the Government is planning to do in any case, and it contains many very general statements. In Finland most of those involved in regional development think that the national strategy plan has no real or practical importance. It is largely theoretical and bureaucratic.

<sup>6</sup> TEM: Maaseutupoliittinen kokonaisohjelma (Rural Development Programmes). Available in Finnish on the internet, http://www.tem.fi/index.phtml?s=2170

### 5 The Rural Development Programmes and other EU policies

#### 5.1 The EU target 2010 (stopping biodiversity loss by 2010)

The RDP gives money to traditional rural habitats and species, but not to forests. As forests are the most important habitat for endangered species in Finland, for protecting and enhancing biodiversity, it can be concluded that the RDP is not contributing to stop biodiversity loss.

#### 5.2 Natura 2000

Finland did not include the measures for Natura 2000 payments in the RDP; these measures refer mainly to national money. Traditional rural habitats in the Natura 2000 areas can get money from some of the agro-environmental measures in Axis 2; and if there is some 'forest' in a meadow or field, this kind of management may be funded via these measures as well. Genuine forest areas in Natura 2000 areas, however, cannot. Some small management plans may be financed by measure 323 Conservation and the upgrading of rural heritage (RDP for Mainland Finland 2007, p. 72, 203-206, 234).

# 5.3 Other related EU policies such as the EU Forest Action Plan, the FLEGT Action Plan, and the Biomass Action Plan

The EU Forest Action Plan is a soft policy in Finland, and there are only a handful of people who have read it. It is mentioned in the RDP only once, while the Forest Law Enforcement, Governance and Trade (FLEGT) is not mentioned at all.

Bioenergy is the biggest winner in this RDP. There was even a special memorandum on bioenergy (MoAF Working Group, 2007b). It opens many budget lines for both agriculture and forest bioenergy (e.g. 111, 121, 123, 311, 312, Leader). This will contribute to achieving the EU biomass and renewable targets.

### 6 The process of developing the programme

The strong claim for partnership in the regulation was new in this programming period. It was important, because historically the Government has not listened to environmental NGOs on rural development issues.

However, their partnership did not work in practice. On 14 June 2006, the Finnish Association for Nature Conservation wrote in the statement to the Ministry of Agriculture and Forestry about the draft RDP:

The Partnership was not working in reality, at either the national or regional levels

At the national level, environmental NGOs could only contribute to the development of the strategy and programme on some subcommittees, but not, for example, in the decisive Strategy Working Group. There was a wide discrepancy between the number of seats for NGOs, and the number of seats for producers.

At the regional level, the administration did not even ask for statements from environmental NGOs. Usually they were not informed at all. The same problem appeared for Leader.

We received the final version of the ex-ante evaluation report only with the draft Rural Development Programme. NGOs were not invited to the evaluation seminar or steering group. That is why we could not express our opinions on background information, methods, alternatives and the contents at the right time. Now the ex-ante evaluation is going to be a bad example of a public hearing, which happened too late.

This statement round has been arranged in the summer holiday season. Given the circumstances, there is a need for longer notice periods.

That is why the Finnish Association for Nature Conservation stresses that partnership and public participation have gone against the Regulation. It is now important to improve the ecological balance of the programme. It is also important to safeguard the participation of environmental NGOs in the future, both nationally (e.g. Monitoring Committee) and regionally.<sup>7</sup>

In addition, the Ministry of Agriculture and Forestry's agriculture units succeeded in dominating the process by nominating preparatory working groups in a very unbalanced way – even inside the Ministry and in Government. Meanwhile the Ministry of the Environment did not have many seats in the decisive working groups. The forestry unit of the Ministry of Agriculture and Forestry, and other forestry bodies and individuals, were also underrepresented.

As result, in the working groups of the four axes, only one environmental NGO member had a seat (in the agro-environmental working group). He was the only member from a very wide NGO coalition (FANC, WWF, BirdLife, Hunters organisation etc.), and he is a specialist in agriculture, rather than forests.

In the twenty subcommittees under the agro-environmental workgroup, four environmental NGO members had a seat. In practical terms, things have not run to plan; for instance when the Natura 2000 subcommittee made proposals to activate Articles 46 and 47 of the Rural Development Regulation for forest biodiversity, the proposal had already been ignored by the agro-environmental working group, and it is possible that the strategy working group did not even think about it.

The consultation round had no impact, because it occurred during the summer holiday period and

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came too late. Even the ex-ante evaluation was a failure; it had no impact on the draft, again because it came too late. In addition, there were no forest biodiversity experts in the evaluation team. Nor was there any statement about the draft ex-ante evaluation. It was not open for comment until it had already been adopted in the strategy and programme, which is contrary to all the principles of environmental and strategic impact assessments.

Unfortunately the Commission did not press Finland to make any major improvements to the RDP. When the programme was approved on 10 August 2007, the Commission stated that they had some problems with some of the agriculture measures related to biodiversity and water, but there was nothing specifically on forests.

It is true that environmental NGOs now have seats on the monitoring committee and working group, which is making more proposals to improve the ecological dimension of the RDP. Unfortunately, however, this working group is not working with forests.

#### 7 Conclusions

Mainland Finland's RDP is for agriculture – not for forests, and still less for forest biodiversity. In general there is more money for forest industry than for forest biodiversity in this RDP. Bioenergy is the biggest winner in the forest sector in this programming period, and is one of the priorities. However, it brings risks as well as possibilities for the environment.

The imbalance in this RDP is due mainly to historical administrative practices in the Ministry of Agriculture and Forestry. Because of this, the partnership and ex-ante evaluation did not work properly.

The Commission has raised some criticisms about shortcomings in the ecological dimension of the RDPs, and a working group is now seeking to rectify this. They made a first improvement proposal to the programme in December 2007. Unfortunately this working group does not work with forests.

A report of the brand new national working group on the Conservation Programme for Southern Finland Forests (METSO) made some references to EU funding, including the rural development fund, in the final report published in December 2007. This may lead to an opening of Axis 2 budget lines for forests, but only if there is a great deal of pressure from the Commission, NGOs, researchers and members of the public.

#### 8 Relationship between agriculture and forestry in Rural Development policy

Finland's rural development policy is continuing the old traditions of the Common Agricultural Policy. It is led by the agriculture units in the MoAF. They think that rural development and the CAP amount to the same thing, and new items are taken into account only when it is absolutely obligatory to do so. The Ministry of the Environment, and even the forestry unit in the Ministry of Agriculture and Forestry, find it difficult to get any ideas into the rural development strategy, and any money for forests out of the rural development fund. That is why there is far less money for forests than agriculture in the RDP for Mainland Finland.

In conclusion, we believe that the imbalance between forests and fields in the Finnish RDP is caused by the history and traditions of the administration. In Finland, agriculture is not possible without public money, but forestry is good business even without subsidies. In addition, forestry has received lots of national financing. Although the new EU budget is smaller than before, the Ministry of Agriculture and Forestry wanted minimal change for farmers.

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