

Funding forests into the future?

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



A report produced by FERN, May 2008



www.fern.org

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This synthesis report is based on six country case studies – Bulgaria (by Vania Ratarova), Czech Republic (by Zdenek Postulka), Finland (by Tapani Veistola), Hungary (by Gabor Figeczky), Romania (by Raluca Barbu), and Portugal (by Domingos Leitão) – available at www.fern.org. The country reports show how each country's programme is contributing to national and EU forest and nature legislation and commitments such as Natura 2000. Information for this report also came from a seminar hosted by FERN in November 2007 in Brussels 'Raising awareness of forest funding via the European Agricultural Fund for Rural Development'.

This publication was made possible with support from the Dutch Ministry of Environment and Spatial Planning and DG Agriculture of the European Commission. The views expressed in this report are those of the authors of the case studies and do not imply the expression of any opinion whatsoever on the part of any of the donors. Neither do they necessarily represent FERN's position.

May 2008

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Acronyms

CAP	Common Agricultural Policy
EU	European Union
FAP	Forest Action Plan
FERN	Forests and the EU Resource Network
FoE	Friends of the Earth
FLEGT	Forest Law Enforcement, Governance and Trade
NBSAP	National Biodiversity Strategy and Action Plan
NFP	National Forest Programme
NPBC	National Plan for Biodiversity Conservation
NSBD	National Strategy for Biological Diversity
NSPRD	National Strategy Plan for Rural Development
RDF	European Agricultural Fund for Rural Development
RDP	Rural Development Programme
SEA	Strategic Environmental Assessment

1 Executive Summary

The Rural Development Regulation adopted in 2005 provides the legal basis for the 2007-2013 rural development fund, which is worth roughly € 12 billion per year. Research commissioned by FERN has found that very little of this money is going into funding programmes to protect forests and improve biodiversity.

Unless the Commission finds the ability to do something about the overwhelming gap between the intention of the regulation and the programmes it is funding, key EU objectives such as the target to halt biodiversity loss by 2010 will be missed.

Researchers in Bulgaria, Czech Republic, Finland, Hungary, Romania and Portugal looked into which forestry measures were expected to be funded by rural development money as well as whether the national rural development programmes were in line with stated national and EU environmental policies. The research shows that although each national rural development strategy is quite different, it is clear that more money is being invested in Axis 1 measures to improve economic ends than in Axis 2 measures to improve the environment. Even where funds were being pushed into Axis 2, it was often to fund afforestation including using non-native invasive species that would aggravate the environmental situation rather than improve it. Furthermore there seemed to be a clear lack of coherence between national and EU environmental policies and rural development programmes. In other words countries don't put their money where there mouth is.

The report shows that one of the main reasons for this lack of coherence is that the Commission's own safety net of having NGO consultation and partnership has been routinely ignored. On several occasions, for example, whilst environmental input was accepted at first, it was deleted at a later stage without clear process. It would be fair to say that the development, implementation and monitoring of national rural development programmes has been insufficiently participatory, and has failed many of the EU's own guidelines for consultation.

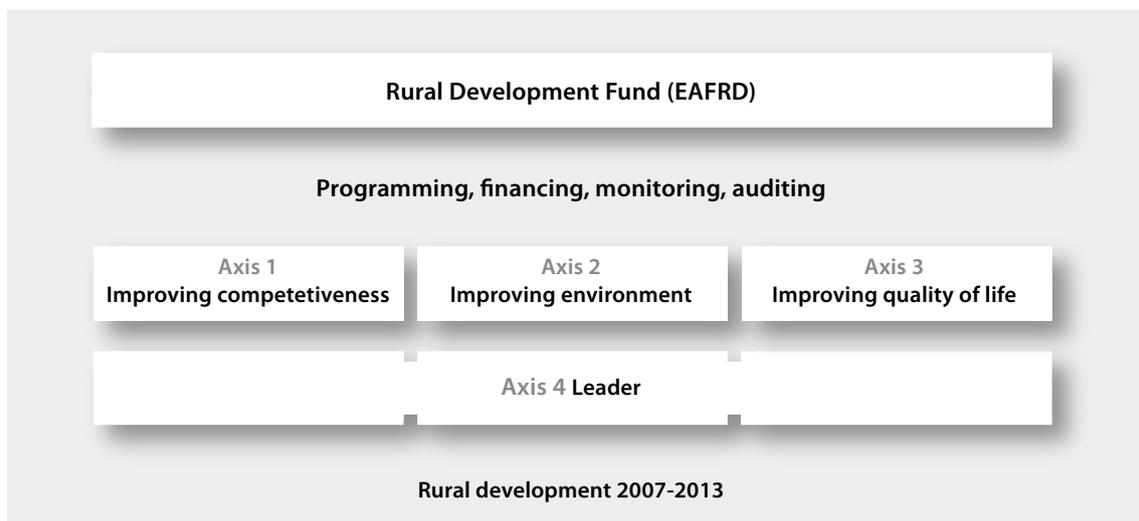
A series of specific recommendations are outlined in Chapter 6, but some of the most pressing are:

- Funding for rural development needs to be spent on biodiversity conservation rather than activities to strengthen the forestry industry.
- More money needs to be allocated to the EU's flagship biodiversity conservation programme, Natura 2000. In several countries there is not even enough money to carry out the programme the countries have committed to.
- Rural development programmes need to be evaluated to ensure they support national forestry programmes, national biodiversity strategies and action plans as well as EU environmental policies.
- The European Commission must develop strict guidelines, in line with EU principles and standards for consultation, about how to develop and implement a consultation process as part of the RDP.

2 Introduction

Forests and other areas of woodland occupy 160 million hectares in Europe (35 per cent of the total area of the EU), but unsustainable forest practices are putting their biodiversity at risk. Of all biotopes in Europe, forests are home to the largest number of species and provide important environmental functions, such as the conservation of biodiversity and the protection of water and soil. Forests also help to regulate the climate – forest destruction leads to CO₂ emissions, while improved forest management contributes to carbon capture. In Central and Eastern European countries, unsustainable forestry practices constitute the biggest threat to wild plants today, with 44 per cent of important plant areas being considered endangered.¹

Most forest practices are subsidised by European or national funds. The largest EU fund is the European Agricultural Fund for Rural Development, also known as the EU Rural Development Fund (RDF). In the last financial period, 2000-2006, € 4.8 billion from this fund was spent on forestry measures. In most cases, however, there was no transparency in how decisions were made, and projects did not lead to improved forestry management practices. Indeed, this spending was severely criticised by the European Court of Auditors in a special report *Forestry Measures Within the Rural Development Policy*, published in March 2005. With Europe's forests in grave jeopardy, and the EU and its Member States committed to a serious decrease in biodiversity loss by 2010, EU funds must begin to contribute to improved forest management and biodiversity conservation. To do this, they must tackle the largest cause of biodiversity loss – current forest management practices. This report analyses how much of the current rural development funding will be spent on forestry and biodiversity conservation measures.



The new Rural Development Regulation² adopted in 2005, includes much enhanced environmental provisions as well as a requirement for consultation at all stages, in the preparation and monitoring of the national strategy plan, and in the preparation, implementation, monitoring and evaluation of the rural development programme.³ This regulation provides the legal basis for a new rural development

1 Anderson, S., Kusilk, T.M. & Radford, E. (eds.) 2005. *Important Plant Areas in Central and Eastern Europe: Priority areas for conservation*. Plantlife International

2 Council Regulation (EC) No 1698/2005 of 20 September 2005 on support for rural development by the European Agricultural fund.

3 Article 6 of the council regulation No. 1698/2005.

fund for the period 2007-2013 with a budget of roughly € 12 billion a year. A large percentage of this € 12 billion could be used for improved forest management, credible certification of well-managed forests, biodiversity conservation and forest management practices that provide rural jobs in the EU.

This report analyses the expected spending on forests and biodiversity in six EU Member States by looking at the national rural development programmes which detail the spending plans. It is based on six country case studies, all available at www.fern.org. Countries were chosen for the expanse of their forests and the size of the rural development budget they received, and include Bulgaria, Czech Republic, Finland, Hungary, Romania and Portugal.⁴



photo: Bulgarian Society for the Protection of Birds/BirdLife Bulgaria

⁴ The country reports show how each country's programme is contributing to national and EU forest and nature legislation and commitments such as Natura 2000. They can be found on www.fern.org. Information for this report also comes from the seminar: Raising awareness of forest funding via the European Agricultural Fund for Rural Development, organised by FERN in November 2007 in Brussels. The seminar's participants included NGOs working on forest issues and/or rural development issues in Bulgaria, Czech Republic, Estonia, Finland, Ireland, Romania, Slovakia, Portugal and Sweden.

3 Background to the Rural Development Regulation and its aims

The Rural Development Regulation

The Rural Development Regulation adopted in September 2005⁵ provides many more opportunities to allocate money to forest protection and sustainable forest management than the previous regulation. It allows for funding various positive measures for forests and biodiversity, and supports EU Member States to work towards achieving their commitments to stop biodiversity loss by 2010. Furthermore Article 6 of the Rural Development Regulation requires stakeholder consultation in the development, implementation, and monitoring of the national rural development strategies and programmes.

In total the Rural Development Regulation lays down 40 possible funding measures.⁶ These measures aim to contribute to the three objectives of the Rural Development Regulation, grouped in the following four axes (see box on page 6):

1. Improving the competitiveness of agriculture and forestry by supporting restructuring, development and innovation;
2. Improving the environment and countryside by supporting land management;
3. Improving the quality of life in rural areas and encouraging diversification of economic activity;
4. Leader, providing funds contributing to the 3 objectives for local action groups.

The National Rural Development Strategy Plans

All Member States have developed a national strategy plan for rural development for the period 2007-2013⁷. This plan should outline the national priorities for the rural development, inline with the Community priorities, laid down in the Community Strategic guidelines⁸. The guiding principles are: strong economic performance must go hand in hand with the sustainable use of natural resources and levels of waste, maintaining biodiversity, preserving ecosystems and avoiding desertification.

The National or Regional Rural Development Programmes

The rural development programmes for 2007-13 will implement the national strategy for rural development through a set of measures, grouped together in accordance with the four axes of the Rural Development Regulation. The rural development programmes need to be in line with the National Rural Development Strategy Plans, the implementation rules developed by the Commission⁹, and the State Aid Guidelines¹⁰. It is up to the Member States to choose which rural development measures to put forward to EU funding. The only mandatory elements are:

5 Council Regulation (EC) No 1698/2005 of 20 September 2005 on support for Rural Development by the European Agricultural Fund for Rural Development (EAFRD)

6 <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32005R1698:EN:NOT>

7 Plans are available at http://ec.europa.eu/agriculture/rurdev/countries/index_en.htm

8 2006/144/EC: Council Decision of 20 February 2006 on Community Strategic Guidelines for rural development (programming period 2007 to 2013)

9 Commission Regulation (EC) No 1974/2006 of 15 December 2006 laying down detailed rules for the application of Council Regulation (EC) No 1698/2005 on support for rural development by the European Agricultural Fund for Rural Development (EAFRD)

10 Community guidelines for state aid in the agricultural and forestry sector 2007 to 2013 (2006/C 319/01) page 28-33 – available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2006:319:0001:0033:EN:PDF>

1. At least 10 per cent of requested funds needs to be spent under Axis 1 and 3; at least 20 per cent of requested funds under Axis 2 and at least 5 per cent under Axis 4;
2. Member States must consult relevant stakeholders (including NGOs) in the development of national programmes.
3. Member States must match the EU funds with own funds. For Axis 1 and 3, the EU Rural Development Fund pays for a maximum 75 per cent of public expenditure in regions eligible under the Convergence objective. In other regions this is 50 per cent. In the case of Axis 2 and 4, the Fund ceiling for public expenditure is 80 per cent in regions under the Convergence objective and 55 per cent in other regions.

Why National or Regional Programmes should be good for the environment

According to the Community Strategic Guidelines, all measures in the rural development programmes should be potential 'good' measures, i.e. measures, which will use natural resources sustainably and maintain biodiversity. See Box 2. Measures contributing to good forest practices, and to protecting

Box 1: Key Terms

Rural Development Regulation: More than half of the population in the EU lives in rural areas. Since 1999, the EU has had a Rural Development Policy. This policy was introduced as part of Agenda 2000, and established a framework for the future of rural areas throughout the EU as an element (pillar 2) of the Common Agriculture Policy (CAP). The reform of the CAP in 2003 acknowledged the importance of rural development in the EU: the aim of the reform was to further strengthen rural development by transferring funds from the first pillar of the CAP (i.e. market and income support) to the second pillar of the CAP (i.e. rural development). Concretely, this meant reducing direct payments for bigger farms and transferring these funds to rural development measures. Currently 15 per cent of the CAP is spent on rural development measures (pillar 2).

Natura 2000: In May 1992, governments of the European Union adopted legislation designed to protect the most seriously threatened habitats and species across Europe, basing it on the Habitats Directive and Birds Directive. These directives require the establishment of Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) which together make up the Natura 2000 sites. Natura 2000 sites are decided when each EU Member State compiles a list of their best wildlife areas and submits it to the European Commission to be evaluated and selected.

Target 2010: The EU Heads of State adopted this target at the Gothenburg EU Summit, June 2001. Their statement included that 'biodiversity decline should be halted with the aim of reaching this objective by 2010'. One year later, the Convention on Biological Diversity's sixth Conference of the Parties adopted the Strategic Plan for the Convention in Decision VI/26. The Decision states '*Parties commit themselves to a more effective and coherent implementation of the three objectives of the Convention, to achieve by 2010 a significant reduction of the current rate of biodiversity loss at the global, regional and national level as a contribution to poverty alleviation and to the benefit of all life on earth.*'

biodiversity, can mainly be found under Axis 2. There are also implementation rules, which include some references about forests.

Box 2: Community Strategic Guidelines¹¹

These guidelines state that to protect and enhance the EU's natural resources and landscape in rural areas, funding devoted to Axis 2 should contribute to three EU-level priority areas: 1. Biodiversity and the preservation and development of high nature farming and forestry systems, and traditional agricultural landscape; 2. Water; and 3. Climate change.

The measures available under Axis 2 should be used to integrate these environmental objectives and contribute to the implementation of:

- The agricultural and forestry Natura 2000 network;
- The Goteborg commitments to reserve biodiversity decline by 2010;
- The objectives laid down in Directive 2000/60/EC of the European Parliament and the Council of 23 October 2000 establishing a framework for Community action in the field of water policy and;
- The Kyoto Protocol targets for climate change mitigation.

Furthermore because of the adoption of the new Strategic Environmental Assessment (SEA) Directive¹² all national rural development programmes need to have an SEA and hence, if it turns out that the rural development programmes have negative environmental impacts, the European Commission could require Member States to amend the plans. Lastly, State Aid Guidelines¹³ adopted by the Commission have made a positive development in that they do not allow for new large scale monoculture plantations that have no environmental value.

Conclusion

As this report shows, however, the reality is different. Although there may have been an improvement in spending to conserve biodiversity and improve forest management practices, in most countries the largest part of rural development funds is being spent on 'business as usual' practises.

11 Council Decision of 20 February 2006 on Community Strategic Guidelines for rural development (programming period 2007 to 2013) (2006/144/EC)

12 <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

13 Community guidelines for state aid in the agricultural and forestry sector 2007 to 2013 (2006/C 319/01) page 28-33 – available at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2002:0704:FIN:EN:PDF>

4 Results

4.1 Forest measures in Rural Development Programmes

The EU's Rural Development Fund pays for a wide variety of measures relating to forests and forestry; and different Member States are able to adopt those measures, which they believe will best serve their particular interests. One purpose of this study was to see whether Member States are using their RDP's forestry measures for the good of the environment, and to ensure that the forests remain viable and healthy in the long term, or primarily for more short-term economic ends.

However, this distinction is by no means clear-cut. In Hungary, for example, over € 250 million of public money (from EU and Government funding) will be spent on the afforestation of agricultural land. These measures are listed under Axis 2 of the RDP, which means that their primary purpose should be environmental, and the authorities have categorised them as environmental measures. Yet most of this money will be spent on creating vast new plantations of black locust trees on the Hungarian Plain. This species is not indigenous to Hungary, and it has many adverse effects on the environment, being invasive and difficult to eliminate. On the other hand, as Gábor Figeczky of WWF Hungary admits, any kind of forest has a soil-protective role, and provides improved climatic and water management conditions, as well as providing better shelter for some bird and other species than open arable land can do. However, whether the environmental benefits will be enough to offset the adverse effects is doubtful to say the least.

Afforestation measures will account for almost half of all public spending on forest-related measures in the Hungarian RDP. The remaining expenditure is divided almost equally between purely commercial and purely environmental measures: € 143 million and € 136.5 million, respectively. (A further € 20.8 million has been allocated for educational and social measures.) Gábor Figeczky of WWF Hungary, however, believes that the RDP remains 'mainly growth- and competitiveness oriented', and that the environmental measures 'will barely be enough to compensate for the damage done by Axis 1 and all the infrastructure development financed by Structural Funds'.

In Portugal, a higher proportion of RDP funding has been allocated to Axis 2 than to Axis 1 measures (€ 245.4 million, compared to € 196.2 million) – and there also appears to be less ambiguity as to whether particular measures will have positive or negative effects on the environment.

The cork and paper industries both play a major part in Portugal's economy, and these industries and others should benefit from measures designed to improve production in forest stands. Examples of this include supporting the increasing supply of forest goods and services and the updating of forest enterprises (for instance by modernising machinery and improving business management). As for environmental measures, these are concerned chiefly with; minimising the risk of damage from fire, pests and disease; restoring the potential of forests damaged by those things in the past; and reducing the effects of climate change, increasing biodiversity, minimising the effects of soil erosion, and protecting water resources. There is also a strong emphasis on increasing the public nature of forests – partly by maximising their soil- and water-protective role, and their contribution to biodiversity, and also by promoting their social role.

Of course there is still some overlap between the commercial and the environmental, however. One of the aims of the so-called environmental measure on 'Forest stand planning and recovery' is to restore



photo: Bulgarian Society for the Protection of Birds/BirdLife Bulgaria

the forest production potential in areas affected by fires and harmful biotic agents – and the main beneficiaries of this will be the producers. The measure on ‘the environmental valorisation of forest areas’ also overlaps with the measures concerned not principally with commerce or the environment, but with the social use of forests. These measures include Actions 3.1.3 (‘Tourism and other leisure activities’) and 3.2.1 (‘Conservation and upgrading of the rural heritage’), which stress ‘the identity and attractiveness of the area’, though one of the main aims is to contribute to economic growth and the creation of employment. In other words, it is recognised that improving the appearance of the natural environment can have direct economic benefits.

This kind of duality is certainly evident in Romania, which has some of the finest forests in Europe, and which is one of the few Member States still to have old-growth forests. According to Raluca Barbu of the WWF, ‘Many of these forests play an important environmental role, and are also used as areas for recreation and leisure, but they have an important economic value at the same time.’

Unfortunately this is not reflected either in the measures of the RDP that Romania has adopted, or in the way that the funds have been allocated. Funding for so-called environmental measures comes to € 229 million – a figure dwarfed by the € 1,270 million allocated to commercial/competitive measures. Direct comparisons are hard to do, however, because in cases where agriculture and forestry are both approached by the same measure, the financial allocation does not distinguish between the two. Such cases include measures 114 (‘Use of agriculture-consulting services by farmers and forest owners’) and 123 (‘Increased value added of farming and forestry products’). Only one of the commercial measures relates specifically to forests: measure 122, ‘Improving the economic value of forests’. Here the money, which will be used on projects such as the construction or modernisation of forestry roads, railways and funiculars, may have a highly damaging effect on the environment. Meanwhile, as in Hungary, most of the funding under Axis 2 will be directed to the first afforestation of Romania’s agricultural or non-agricultural land. ‘With regard to protecting Romania’s forests,’ Raluca Barbu writes, ‘the amount

allocated to the forestry sector (which in territorial terms amounts to 26.7 per cent of Romania's land mass) is less than 10 per cent of the budget of Axis 2. This is much too low, because Axis 2 already has the lowest allocation (20 per cent) allowed by the Rural Development Regulation. The national rural development programme does not include any justification for the allocation compared to needs and the cost of investing in afforestation of agricultural or non-agricultural land.

In the Czech Republic, in contrast with Romania, public funding for Axis 2 measures outstrips that for Axis 1. The measures under Axis 1 comprise investment in forests (forestry mechanisation, the purchase and modernisation of technical equipment for businesses, and forestry infrastructure), and the provision of training, education and advisory services. Under Axis 2, in the Czech Republic as elsewhere, the measure with the largest cash allocation concerns afforestation ('Afforestation of agricultural land', measure II.2.1). However, money has also been allocated to improving the species composition of forest stands (and specifically the planting of indigenous species, especially broadleaved trees and fir); restoring forestry potential after calamities; and supporting the social function of forests (e.g. grants for projects for forest tourism). Natura 2000 payments will be dealt with separately below.

In Bulgaria, thirty measures have been adopted under the RDP, and eleven of these directly target forests or forest-related issues. Five of these are Axis 1 measures (111, on training; 114, on the use of advisory services; 122, on improving the economic value of forests; 123, adding value to agricultural and forestry products; and 125, on improving and developing the agricultural and forest infrastructure). A further three measures come under Axis 2 (223, first afforestation of non-agricultural land; 226, restoring forestry potential and preventing calamities; and 224, which concerns Natura 2000). According to Vanya Ratarova and Veronika Ferdinandova of the Bulgarian Society for the Protection of Birds, however, the Natura 2000 measure is the only one that can realistically be described as predominantly environmental rather than predominantly commercial.

In Bulgaria, too – as in Romania – it is impossible to make accurate comparisons regarding spending on the different measures, because in many cases no distinction has been made between spending on agricultural activities and spending on forestry-related ones. Almost € 1,000 million of funding falls into this category, and most of that money (almost € 535 million) has been allocated to a single measure: 'Adding value to agricultural and forestry products.' As far as forestry is concerned, this money will support investments relating to wood as a raw material. Some money will also be spent on building and maintaining the infrastructure, and on the development of micro-enterprises, which could have a severely damaging effect on the forestry environment if not planned and executed sensitively.

In Finland, there is a similar lack of clarity regarding how the money will be allocated between agriculture and forestry – but where a distinction can be made, it is evident that most of the funds are destined for exclusively agricultural measures. There are no measures directed only towards forests; and the programme contains nothing new or obligatory for enhancing biodiversity. Instead, the RDP for mainland Finland has made a priority of developing bioenergy, although concerns have been raised both by environmentalists and by those in the forestry industry. Forestry businesses are worried that the demand for wood for bioenergy will lead to a rise in prices, and that this will lead to competition with other forest products; while environmental NGOs warn that we do not know enough about the possible ecological impact, beyond the fact that the ecosystem is undoubtedly affected when too much biomass is removed from the forests.

There is concern also because Finland has not taken the opportunity to use the rural development funds for Natura 2000 forest areas, nor for forests outside the Natura 2000 areas – even though national funding sources alone are inadequate for developing Natura 2000 plans and projects.

In Hungary, likewise, no funds have been allocated to Natura 2000 sites under the RDP. Although establishing and managing the Natura 2000 network will cost an estimated € 8 million per year, it has not been possible to make any payments so far, because the Natura 2000 maps have not been synchronised with Hungary's Land Parcel Identification System. Nor has it been possible to give compensation payments for Natura 2000 forests, because experts have not been able to define the basis on which such area-based payments might be made. Therefore this measure will not be launched until this definition is finalised.

There will be delays in other EU Member States as well, but the effects of this may vary. In Bulgaria, for instance, € 15.5 million has been set aside for forest protection under the Natura 2000 measure; but this will not come into force till 2009, and it is feared that this delay will go much beyond 2009 as the measure hasn't been developed yet and no proper registration system for forest owners is being created and put in place.

In Romania the amount allocated under Natura 2000 is similar – just over € 16 million of public money – which, according to Raluca Barbu of the WWF, 'seems insufficient in view of the extent of the surfaces covered by forests in the Natura 2000 sites'. In this case, however, the delay in payments (until 2010) may actually have a beneficial effect, since by that time it is envisaged that a reallocation of funds may have become necessary, and therefore more funding may be available for the Natura 2000 programme.

In Romania, currently, the € 16 million of public money for the Natura 2000 programme is supposed to be divided between 5,351 beneficiaries, with an average allocation per beneficiary of € 3,000. Since the land in question amounts to some 26,755 hectares, the average allocation per hectare will be € 600. Although this may be inadequate, it is a much more generous ratio than in the Czech Republic, where the € 12.2 million allocated will have to suffice for 37,000 hectares of Natura 2000 sites: an average allocation per hectare of just € 330. In return for these payments, in the Czech Republic as elsewhere, forest owners or managers must agree to leave the property more or less untouched, under a non-intervention regime, for at least twenty years.

In Portugal, finally, eight Natura 2000 sites will benefit from forestry-environmental measures, including the renaturalisation of forest areas, the renaturalisation of holm oak plantations, and the configuration and recovery of tree diversity in forest stands.

Conclusion

In all cases the bulk of rural development money is spent on activities to strengthen the forestry industry rather than biodiversity conservation. There is certainly no trend towards improved forest management, as badly needed to meet target 2010. It is of specific concern that a large percentage of funds is being spent on plantations with alien, and sometimes, invasive species. It is incomprehensible that such measures were allowed to be incorporated under 'the environmental Axis, Axis 2 and it would require further study to see if these measures are not in violation of the State Aid Guidelines. Another concern is the little money that has been allocated to the EU's flagship biodiversity conservation programme, Natura 2000. It is sad to note that in several countries the funds allocated to Natura 2000 will by no means be enough to carry out the programme the countries have committed to.

4.2 Rural development programmes and national policies

Are RDPs in line with national policies relating to rural development, forestry and biodiversity? It is important to establish this in order to get an idea of whose interests the RDP chiefly serves. If there is obvious conflict between the RDP and national policies, it may be a sign that the RDP is being imposed without sufficient attention to the particular circumstances of an individual member state. On the other hand, it may mean that the member state in question has drawn up its national policies to satisfy its own narrow interests, or the interests of powerful pressure groups, without sufficient attention to broader Europe-wide concerns.

With this in mind, it is encouraging – on the face of it – that a degree of convergence was found in each of the countries studied. The national rural development strategies of Romania and the Czech Republic were produced more or less in parallel with the RDP, while they of course should have preceded these plans. In Hungary, there are measures in the RDP, which have the potential to contribute towards the objectives of the National Environmental Programme and the National Nature Conservation Plan; and the RDP also appears to be in line with the National Forest Programme. In Portugal, according to Domingos Leitão of the Sociedade Portuguesa para o Estudo das Aves – the RDP is ‘broadly in line with the national rural development strategy’, and ‘conceptually in line with the National Strategy for Conservation of Nature and Biodiversity’. Finally – and more grudgingly – Tapani Veistola of the Finnish Association for Nature Conservation states that ‘in general, mainland Finland’s RDP is not in conflict with the national rural development strategy.’

When one looks in more detail, however, problems and provisos emerge. In Finland, according to Tapani Veistola, ‘there are such great differences between mainland Finland’s RDP and the National Strategy Plan for Rural Development that comparisons are difficult’. More worryingly, many of those involved in regional development in Finland believe that the National Strategy Plan ‘has no real or strategic importance. It is largely theoretical and bureaucratic.’ Conflicts exist not just between national policies and



photo: Leontien Krul (FERN)

the RDP, but also between different areas of national policy. For instance, mainland Finland's Strategy Plan for Rural Development does not support the National Forest Programme, nor is it in line with the country's National Biodiversity Strategy.

In Portugal, the aims of the National Forest Strategy are in line with the forestry objectives and measures of the RDP – which in practice means that both are chiefly concerned with increasing the total economic value of forestry. This may bring some environmental benefits, for instance with regard to protecting forests against harmful biotic agents and restoring the production potential of affected ecosystems. In other areas, however, there are risks for the environment. In particular, the apparent convergence between the RDP and the National Strategy for Conservation and Biodiversity is unfortunately undermined by shortages in funding, and the scarcity of measures to promote the adequate management of Natura 2000 sites. This means that these areas will continue to suffer from land abandonment and the loss of biodiversity.

Hungary, meanwhile, does not even have a National Biodiversity Strategy Action Plan (NBSAP). There is a National Nature Conservation Plan, but this is not mentioned in the RDP – though there are measures in the RDP which have the potential to contribute towards the objectives of these programmes (in particular the forest-environment measure, which is concerned with the repression of non-indigenous



photo: Janis Kuze

trees and providing the right conditions for the creation and maintenance of natural mixed forests). Whether these measures serve to protect and enhance the state of Hungary's forests in practice is more doubtful. It is also questionable whether the RDP is in line with Hungary's National Forest Programme, which was implemented to bring about an improvement in the management and protection of the country's forests in the period 2006–2015. According to Gabór Figeczky of WWF Hungary, 'a stronger focus on environmental forestry measures is definitely necessary in the RDP', even though the RDP appears to be in line with the National Forest Programme – 'on paper at least'. The situation with regard to Hungary's Rural Development Strategy Plan is equally uncertain: 'It has hardly fulfilled the expectations which the European Commission considered such a strategy should have,' Gabór Figeczky writes. 'It does not function as a real strategy.'

As noted above, the Bulgarian version of the RDP can be said to be in line with that country's National Strategy Plan for Rural Development, since its main purpose is to apply the National Strategy Plan. And certainly the overall objectives of this strategy (to develop a competitive and innovation-based agriculture, forestry and food-processing sector; to protect national resources and the environment of rural areas; to improve the quality of life and diversity of job opportunities in rural areas; and to build local capacity and to improve local governance) tally very closely with the RDP's Axes 1, 2, 3 and the Leader Axis, respectively.

With regard to Bulgaria's forestry and biodiversity programmes, however, the position is less clear. In fact Bulgaria currently has no national forest programme. A National Forest Policy and Strategy 2003–2013 was developed in 2002, but never approved by Parliament. In 2006, however, two other documents were adopted: the National Strategy for Sustainable Development of the Forest Sector in Bulgaria 2006–2015, and the Strategic Plan for Forest Sector Development 2007–2011. Both documents emphasise the need for the sustainable development of Bulgaria's forest sector; and the RDP takes direct account of at least some of the Strategic Plan for Forest Sector Development's objectives and key measures. The RDP will contribute to the quality and economic potential of the forests, and will encourage sustainable and rational timber use. It will guarantee funds for research and technical development to increase competitiveness, and it will support education and the gaining of qualifications in the field of silviculture.

However, Vanya Ratarova and Veronika Ferdinandova of the Bulgarian Society for the Protection of Birds say that there is concern about the negative impact on nature and biodiversity which could result from the building of new roads through the forests; and they believe that measures on forest biodiversity and the development of agro-silvicultural systems are likely to be poorly implemented, due to under-funding. Furthermore, when these authors turn to Bulgaria's biodiversity action plan, the National Plan for Biodiversity Conservation (NPBC), they find many areas where the RDP is clearly not in line with it.

The long-term strategic objective of the NPBC is 'protection, restoration and sustainable management of Bulgaria's biological diversity in order to create optimal conditions, environment and perspectives for human life'. However, Axis 2 of the RDP does not go far enough in resolving all the issues relating to environmental protection. In addition, the RDP's measures on training do not address the environmental problems relating to biodiversity conservation clearly enough, and this could lead to the implementation of projects with negative impacts on biodiversity. Further damage could be caused by the delay in compensating forest owners for land within Natura 2000 sites. Overall, therefore, the RDP is not in line with the NPBC in terms of forests; and there is also conflict between the NPBC and the NSPRD – again with regard to biodiversity. The first objective of the NSPRD – 'to develop a competitive and innovation-based agriculture, forestry sector and food-processing sector' – is likely to encourage the intensive exploitation of Bulgaria's forests, to the detriment of biodiversity. So, as elsewhere, careful planning will be needed to prevent such conflict between national and EU policies designed to encourage economic interests and to protect the environment.

There is a similar need for careful planning in the Czech Republic. Friends of the Earth has set out six minimum standards which it believes should be included in all relevant RDP forestry measures: standards designed to prevent over-exploitation, and to encourage better conditions for the future health of the forests. Only if these standards are implemented, FoE believes, can the RDP truly be said to be supporting the goals of the National Forest Programme (NFP) and the National Strategy for Biological Diversity (NSBD).

Currently, unfortunately, the RDP for the Czech Republic contains just two measures dedicated to the improvement of species diversity in forests, and these are inadequately funded. There is no RDP funding whatever for the new categorisation of forests (as recommended by the NSBD); nor does the RDP include any efficient measures or standards to reduce clearcutting – even though the NFP and NSBD both identify clearcutting as one of the most damaging forest practices.

Of the six countries studied, it is only in Romania that the RDP appears to be in line with the relevant national policies. As in Bulgaria and the Czech Republic, the National Strategy Plan for Rural Development (NSPRD) was developed and approved in parallel with the RDP; and since the National Forest Programme (developed slightly earlier, in 2005) is thought to be in line with the National Strategy Plan, then it may be seen as being in line with the RDP as well. According to Raluca Barbu of WWF, both the National Forest Programme and the National Strategy Plan have ‘the same purpose – to develop the forestry sector, with the aim of raising its contribution towards quality of life based on sustainable forest management.’ The National Biodiversity Action Plan also appears to be consistent with other EU strategies and policies, though it is not specifically mentioned as a key document in the National Strategy Plan.

Yet even this finding – that the RDP is generally in line with national policies in Romania – needs to be treated with caution, in view of the doubts surrounding the effects that the RDP is likely to have on the forest environment and on biodiversity. As reported above, the RDP for Romania puts far more emphasis on commercial measures than on environmental ones: and therefore convergence is by no means a cause for complacency. As elsewhere, therefore, those concerned with the welfare and sustainability of Europe’s forests will need to remain vigilant.

Conclusion

Although the national RDPs must be based on and implement the national rural development strategies, in several countries they were developed in parallel. More worrying is that in none of the countries, with the possible exception of Romania, the national rural development programme seems to be in line with the national forest programme (NFP), which in some cases is non-existent. Even though many national forest programmes seem to focus more on the economic value of forests than the ecological value, the RDPs do not seem to be supportive of these NFPs. Furthermore the gap between the aims of the RDPs and the national biodiversity strategies and action plan seems to be even wider, leaving great concern about how far any RDP will be able to contribute to biodiversity conservation.

4.3 The Rural Development Regulation and EU environmental policies

Since the Rural Development Regulation is an EU initiative, its implementation in different Member States should support other related EU policies. A detailed look at the expected effects of RDPs shows that, all too often, they are more likely to undermine them.

In the six countries studied, the measures adopted in the various national RDPs were analysed in relation to the aims of a number of relevant EU policies: the EU target 2010 (stopping biodiversity loss by 2010); the EU Forest Action Plan; the Forest Law Enforcement, Governance and Trade (FLEGT) Action Plan; and Natura 2000. The reports from four of the countries (Finland, Portugal, Hungary and Bulgaria) identified various problems and possible conflicts. In the other two countries, Romania and the Czech Republic, the RDP appears to provide opportunities for furthering the aims of the other EU policies relating to forestry and the environment, but even here the status of some of the measures of the RDP is so ambiguous as to give rise to serious concern.

The situation in Finland and Portugal is especially worrying. In neither country will the RDP contribute to the EU target 2010. In Portugal, this is because the largest proportion of the investments has been earmarked for the intensification of farming and forestry activities, and this will lead to an actual loss of biodiversity in Portugal's rural areas, with the measures designed to protect biodiversity being inadequate to compensate for the negative effects. Meanwhile in Finland the RDP contains no specific provision for expenditure on the country's forests: and since forests are 'the most important habitat for endangered species in Finland' (as Tapani Veistola of the Finnish Association for Nature Conservation writes), 'it can be concluded that the RDP is not contributing to stop biodiversity loss.'



photo: Leontien Kruif (FERN)

Similarly, Finland has not included measures for Natura 2000 payments in its national RDP; and the situation is little better in Portugal, where the Natura 2000 network represents one fifth of the country's territory, but will receive only 3.5 per cent of the funds from the European Agricultural Fund for Rural Development (EAFRD). As Domingos Leitaõ writes, 'This means that these areas will continue to suffer from land abandonment and loss of biodiversity.'

Commitment to the EU Forest Action Plan and the FLEGT Action Plan is also weak or non-existent in both countries (the latter not being mentioned at all in Finland's RDP) – but the situation is markedly different with relation to the Biomass Action Plan. According to Tapani Veistola, 'Bioenergy is the biggest winner in this Rural Development Programme', with a special memorandum on bioenergy being produced by Finland's Ministry of Agriculture and Forestry, which opens many budget lines for biomass production in both agricultural and forest areas. In Portugal, likewise, the RDP contains measures to encourage the production, processing and marketing of biomass for producing energy. The use of such will only have a positive effect on reducing carbon emissions if the wider effects on forestry (and agriculture) are taken into account.

The situation is much the same in Bulgaria and Hungary, where the only related EU measure to be strongly supported by the RDP appears to be the Biomass Action Plan. In Hungary, it is envisaged that



photo: Leontien Kruil (FERN)

almost 50,000 hectares of land will be allocated to biomass production, and that around €324 million will be spent on promoting the plan. This will be supported by the measure 'Investments in public holdings'. In Bulgaria, too, the RDP contains at least one measure strongly encouraging the production and processing of biomass ('Adding value to agricultural and forestry products'), and several other measures supporting biomass production more indirectly (e.g. 'First afforestation of agricultural land'). One danger, however, is that there are no specific provisions to ensure that the planned actions are suited to local conditions and will not harm biodiversity; and this is a direct threat to the EU target 2010.

There are other reasons to be concerned about biodiversity in Bulgaria, too. The possible impact of the construction of forest roads has already been mentioned (see section 4.2, above). The RDP also fails to address the issue of the damage done by invasive alien species.

As mentioned before, one of the major elements in the EU's aim to stop the loss of biodiversity is the creation and protection of a network of sites of special environmental value – Natura 2000. However, funding for Natura 2000 has been identified as a problem in several Member States, including Bulgaria and Hungary. In Bulgaria, payments have been postponed till the period 2009–2013, and while in the agricultural sector, the RDP can contribute towards the preservation of Natura 2000 sites, when it comes to forests this is only theoretically possible. One of the compounding problems in this regard has been the huge delay of the formal designation of Natura 2000 sites in Bulgaria, and almost exactly the same situation exists in Hungary, where it still needs to be established if there are any discrepancies between the Natura 2000 maps and the Land Parcel Identification System. Until it can be confirmed that no discrepancies exist, Natura 2000 payments in Hungary will continue to be delayed.

Hungary and Bulgaria are also comparable with regard to the FLEGT Action Plan. Neither the Hungarian nor the Bulgarian RDP contains any mention of forest law enforcement, or any other measures against the trade in illegal timber. However, the RDPs of both countries put substantial emphasis on measures compatible with the EU Forest Action Plan (the overall objective of which is to support and enhance sustainable forest management and the multifunctional role of forests). In both countries, these include measures on fostering cooperation, improving education and training in forestry, and enhancing the protection of forests (under key action 9) and especially key action 4, promotion of the use of forest biomass for bioenergy. Key action 9 also includes various additional sub-actions recommended by the Commission to the Member States in order to improve the environment – e.g. the promotion of an agro-forestry system, and of schemes to encourage forest owners to engage in voluntary environmental commitments. However, these sub-actions and action 7 from FAP on contributing towards target 2010 have been widely ignored, and they are not included in Bulgaria's RDP; while in Hungary, too, Gábor Figezky believes that the RDP would be more effective in supporting the EU Forest Action Plan if its budget was concentrated more on environmental issues.

In the other two countries studied, Romania and the Czech Republic, the RDP is more consistently in line with the other related EU policies. In Romania, indeed, Raluca Barbu of WWF states that the national RDP currently covers 'all the main environmental issues concerning the biodiversity of agriculture and forest areas' – at least on paper, since it is too early to know exactly what the effects will be. Zdenek Postulka of Hnutí DUHA (Friends of the Earth Czech Republic) is also very much concerned about how potentially beneficial measures of the Czech Republic's RDP will affect the environment and biodiversity in practice:

We are especially concerned that some of the proposed Axis 2 measures will – completely contrary to Axis 2's purpose and goals – fund activities that will lead to further loss of biodiversity and damage important habitats.

In other words, although in both Romania and the Czech Republic the RDP can be said to support the EU target 2010, this will depend almost entirely on individual projects and the specific criteria that they are subject to. Zdenek Postulka's report on the implementation of the RDP in the Czech Republic goes into great detail about particular measures of the RDP, and how they should be applied in order to avoid damaging biodiversity and the environment.

As in all the other countries studied, the RDP in Romania and the Czech Republic appears to support the EU's Biomass Action Plan. The Romanian RDP puts special emphasis on investing in biofuel, biomass and other renewable energy sources; while in the Czech Republic's draft RDP, there are several measures that will fund renewable energy projects in general and biomass in particular. Although the case for biofuels is still controversial, the Czech branch of Friends of the Earth welcomes the promised environmental and economic benefits – while it also believes that sensitive forest areas should be subject to clear rules concerning the use of logging waste and the amount of biomass that should remain in situ.

The other feature that is reported to be constant across all the countries studied reflects the concerns about the implementation and funding of Natura 2000. As observed above, funding for the Natura 2000 programme is a problem in Hungary, Bulgaria, Portugal and Finland, and the same difficulties are being faced in Romania and the Czech Republic. The budget for the Natura 2000 project in the Czech Republic is reported to be 'unclear' (at best), or 'heavily underfunded' (at worst); while in Romania, the budget allocation is estimated to cover only about 0.2 per cent of the total area proposed for the Natura 2000 network. And as the details concerning the funding and management plans remain unclear, it will be a major challenge to persuade farmers and foresters about the importance and benefits of Natura 2000. The broader conclusion is that the Natura 2000 programme could have a highly positive effect on the environment of all six countries studied – but only if it is properly funded, planned, and implemented.

Conclusion

In all countries studied, the measures adopted in the various national RDPs that were analysed in relation to the aims of a number of relevant EU policies: the EU target 2010 (stopping biodiversity loss by 2010); the EU Forest Action Plan; the Forest Law Enforcement, Governance and Trade (FLEGT) Action Plan; and Natura 2000, identified various problems and possible conflicts. In none of the countries is the RDP said to be working towards implementing any of these policies and in all cases many of the measures funded by the national RDPs are in violation with the policy objectives notably of the EU target 2010. It is therefore difficult to see how the RDP can contribute positively to the 2010 target, despite the fact that in some countries some funds have been allocated to Natura 2000.

4.4 Partnership and the consultation process for RDPs

The preceding sections have identified numerous problems and questions concerning different Rural Development Programmes, but technically there is a mechanism for dealing with these. This is known as the 'partnership principle', and it is defined in Article 6 of the regulations of the European Agricultural Fund for Rural Development (EAFRD):

EAFRD assistance shall be implemented through close consultations (hereinafter partnership) between the Commission and the Member State and with the authorities and bodies designated by the Member State under national rules and practices, including ... any other appropriate body representing civil society, non-governmental organisations, including environmental organisations.

So how successful has the partnership principle been in practice?

In two of the countries studied – Bulgaria and Romania – Article 6 appears to have been largely adhered to. In the other four countries – Hungary, Finland, Portugal and the Czech Republic – the experience has been much less satisfactory. In none of the six countries, however, has the process been entirely straightforward.

One of the major issues raised in each country relates to the participation (or otherwise) of representatives from non-governmental organisations (NGOs); and it is easy to see why. Concerns have been raised in at least one of the countries where adherence to Article 6 is considered to have been unsatisfactory – the Czech Republic. There, environmental NGOs were not represented at all in the working groups which developed the RDP; and when the RDP Monitoring Committee was set up subsequently, NGOs were allowed just one seat, which has been taken by an NGO in the area of community development. No other NGOs – from environmental groups or otherwise – are represented. This compares very poorly with the situation in Romania, for instance, where a total of four environmental NGOs have been nominated as members of the Monitoring Committee.

In the other countries studied, however, the situation is less clear-cut. In Bulgaria (the only country other than Romania where Article 6 is considered to have been adhered to), there were two representatives from environmental NGOs on the working group established to guide the RDP's preparation. But at the time of writing, it is envisaged that there will be just one environmental NGO representative on the Monitoring Committee for the implementation of the RDP. In Hungary, by comparison, two environmental NGOs have been invited to serve on the Monitoring Committee. And in Portugal, where consultation with environmental NGOs at the national level has been minimal, NGOs have had a much stronger voice on the regional monitoring and steering committees.



photo: WWF Danube Carpathians Programme

The situation in Finland is worth considering in rather more depth, because it illustrates many of the issues faced elsewhere. In June 2006, the Finnish Association for Nature Conservation complained to the Ministry of Agriculture and Forestry that the partnership 'was not working, at either the national or regional levels'. The causes for dissatisfaction included the following:

- at the national level, environmental NGOs could not contribute to the important Strategy Working Group
- there was a significant discrepancy between the number of seats allocated to NGOs and the number allocated to producers, with NGOs being seriously underrepresented
- at the regional level, the administration neither asked for statements from environmental NGOs, nor informed them later
- the consultation round was arranged at an inconvenient time (the summer holiday season), and at very short notice.

Exactly the same problems and concerns were encountered, to differing degrees, elsewhere in the EU. Finland's experience, with NGOs being underrepresented in comparison with business organisations on monitoring groups and steering committees, is typical. The only country where a slightly different situation was reported is Hungary, where the Monitoring Committees set up for the period 2004–2006 consisted mainly of representatives from NGOs. Even here, however (according to Gábor Figeczky of WWF Hungary), voting patterns proved that these NGOs had been selected in such a way as to ensure that government proposals would always be approved. And in the current period (2007–2013), only 12 of the 74 members of the RDP Monitoring Committee are NGOs (with just two of these, as noted above, being environmental organisations).

In Hungary, as in Finland, the public consultation process was also seriously flawed. Roadshows were held, and documents were put on the internet to enable members of the public to comment on them, but very little of the resulting feedback had any effect; and some issues, especially budgetary ones, were apparently not open for discussion at all.

In mainland Portugal, one of the major problems with the public consultation process was that it was so short – a period of about one month after publication of the first draft of the proposal. In the Czech Republic, a series of regional seminars were held, but these were hastily convened and with little publicity being given; they were brief in duration (the concluding seminar in Prague lasted just three hours); and, in the case of the Strategic Environmental Assessment (SEA), the deadline for comments was less than one week after the day of the public hearing. In the rare cases where members of the public were sufficiently quick off the mark with their comments, most of them received only a bare statement that their suggestions had been rejected, with no further explanation being given.

Even in those countries where Article 6 was largely adhered to, the public consultation process left much to be desired. In Romania, there were few public consultations on the development of the RDP, and at first these were fairly shambolic. Later a 'more efficient and participatory style of consultations developed' (according to Raluca Barbu of WWF) – but consultation on the SEA was 'almost non-existent', with many stakeholders learning about the meeting only after it had already taken place. It had in fact been held just one day after submission of the document, meaning that even those people who found out about it had almost no time to prepare comments.

In Bulgaria, similarly, the consultation period for the second draft of the RDP and SEA documents was extremely short – one week – and information about it did not reach the stakeholders effectively enough. However, in Bulgaria the experience with the ex-ante evaluation has been more positive. Here a questionnaire was sent to interested parties to give feedback about the programme, and this resulted in the programme being clarified and improved. This gives more grounds for optimism than in the other

countries studied. In Hungary, for instance, the ex-ante evaluation was performed without any public consultation whatsoever, and with no input from NGOs; while in Finland, the ex-ante evaluation was not open for comment until it had already been adopted, which is contrary to the principles of environmental and strategic impact assessments.

Perhaps environmental and forestry groups in Finland and in the other countries studied should take note of the words of Domingos Leitão of the Sociedade Portuguesa para o Estudo das Aves: 'We are not happy with the lack of effective participation, and have kept up the pressure to be heard, both alone and in coalition with ... other NGOs.'

Conclusion

In Romania and Bulgaria Article 6 has been more or less adhered to, although even in these countries the consultation process could have substantially improved. The influence of the NGOs has been insufficiently visible in the final RDP. In none of the other countries was a proper process in place to ensure environmental concerns were fully taken into account. There were several instances where environmental input was accepted at first, but then deleted at a later stage without clear process. It would be fair to say that the development, implementation and monitoring of national RDPs has been insufficiently participatory and has failed many of the EU's own guidelines for consultation, as described in the EU Communication 'Towards a Reinforced Culture of Consultation and Dialogue- General Principles and Minimum Standards for Consultation of Interested parties by the Commission', COM(2002)704 final.¹⁴

14 <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2002:0704:FIN:EN:PDF>

5 Conclusions

Despite the opportunities that rural development funding should have opened up, national RDPs make for sober reading. There were many improvements in the Rural Development Regulation which allow for environmental protection and require consultation in the development, implementation and monitoring of the plans, but it seems unlikely that any of the national RDPs will lead to serious and much needed improvements of forestry practices. Furthermore in most countries researched, there is insufficient money available for the EU's flagship biodiversity conservation programme, Natura 2000. Although there has been some form of consultation in most countries, in virtually none did this lead to environmental concerns being taken seriously and added into the text of the RDP. In short, we can conclude that:

- **In none of the countries will the measures funded by the RDR really contribute to target 2010.** Hence, the largest funding source for biodiversity conservation is not being used effectively by most Member States. This has the knock on effect that neither they nor the EU will be able to achieve target 2010. The RDPs will not provide the much needed incentive towards improved forest management. Although environmental measures are being funded under most RDPs, this funding is being outweighed by Axis 1 spending on business as usual practices. The damage done by Axis 1 funding is much larger than can be undone by funding minor environmental improvements. Hence most RDPs will overall not contribute to EU target 2010.
- **A large percentage of funds is being spent on plantations with alien, and sometimes, invasive species.** It is incomprehensible that such measures were allowed to be incorporated under 'the environmental Axis' Axis 2.
- **Not sufficient funding for Natura 2000.** The RDPs will allocate insufficient funds to the EU's flagship biodiversity conservation programme, Natura 2000. It is sad to note that in several countries the funds allocated to Natura 2000 will by no means be enough to carry out the programme the countries have committed to.
- **No congruency between national forest plans and national biodiversity strategies and plans.** Although the national RDPs must be based on and implement the national rural development strategies, in several countries they were developed in parallel. In none of the countries, with the possible exception of Romania, the national rural development programme seems to be in line with the national forest programme, which in some cases is non-existent. In none of the countries the RDPs and the national biodiversity strategies and action plan are in line with each other.
- **No proper consultation process.** The influence of the NGOs has been insufficiently visible in the final RDP. In most countries there was no proper consultation process in place to ensure environmental concerns were fully taken into account.
- **Bio-energy is an important new area for funding** in all these programmes. There are as yet no criteria in place for sustainable biomass production. This needs urgent attention.

6 Recommendations

In order to ensure that the issues highlighted above are addressed and target 2010 achieved, the following will be necessary:

To the European Commission

- The European Commission should make it mandatory for Member States to include all relevant measures to properly implement the national Natura 2000 programme;
- The European Commission should make it mandatory for Member States to include forest environment measures;
- The European Commission must ensure that all spending is in line with national forest programmes and national biodiversity strategies and actions plans or otherwise suspend funding;
- The European Commission must implement its own guidelines in a more strict and transparent manner. It is clear that many Commission approved RDPs are in violation of the Commission's Guidelines;
- The Commission should include in its Guidelines that all RDPs must be in line with EU biodiversity conservation policies, and national forestry programmes and National Biodiversity Strategy and Action Plans (NBSAPs);
- The European Commission must ensure that only environmentally useful afforestation will take place. Creating plantations of aliens and invasive species has no place under the RDP and certainly not under Axis 2;
- The European Commission must develop strict guidelines, in line with the EU Principles and Minimum Standards for Consultation, as detailed in EU Communication (2002)704, about how to develop and implement a consultation process as part of the RDP;
- The European Commission and the European Parliament should develop a vision towards bio-energy use in Europe to ensure that bio-energy production in Europe is sustainable and has no negative environmental or social impacts.

To European NGOs

- National NGOs should develop sustainable bio-energy plans at national level;
- National NGOs should research into whether EU funded national afforestation projects are in violation of State Aid Guidelines.

Annex

Summary of result of seminar organised by FERN November 2007: Raising awareness of forest funding via the European Agricultural Fund for Rural Development

	Money going to forest related activities	Contribute to target 2010 / Natura 2000	Participation / Article 6
Portugal	Total EU funds of RDP for mainland Portugal are 3.5 billion of which 190 million goes to Axis 1 (mainly eucalyptus plantations) and 245 million to Axis 2.	No the programme does not contribute sufficiently to target 2010. Too much money for business as usual (eucalyptus) cork funding.	No proper consultation process. There is, however, NGO participation in monitoring and steering committee.
Bulgaria	The EU contribution to the RDP is 2.6 billion. The total sum related to forestry, and forest/agriculture, around € 1.1 billion. The subsidies going explicitly to forests from the total budget amount to € 133 million.	The programme does not contribute sufficiently to 2010 target. Only 0.5 per cent of the Bulgarian grand total public RDP budget will go to be allocated to Natura 2000 payments for forests.	Consultation was too late for the forestry WG. No protocols sent to the NGOs. Drafts are not available, nor information available. NGOs participated in ex ante evaluation. One NGO representative in the RDP monitoring committee.
Romania	Total EU funds for RDP 8 billion. No money for Natura 2000.	The programme does not contribute sufficiently to target 2010.	No proper consultation No NGOs in monitoring committees or steering committees, poor attendance.
Czech Republic	Total EU funds for RDP are 2.8 billion. 250 million is allocated to forest measures. 4 million to Natura 2000	Only 2 measures contribute to halting biodiversity.	No real communication or consultation. FoE did not get an invitation despite being active. No NGOs WG or in monitoring committee.
Finland	No specific money for forestry and no money for Natura 2000		No NGOs in strategy WG. 1 NGO in Axis 1 working group. 1 NGO in agro-envi WG No NGO proposals accepted by strategy working group.
Poland	Overall RDP budget (which is biggest in whole EU) 17.2 billion Euro of which 13 billion is EU contribution. No distinction between forest and agriculture funding. Only 2 measures specific for forestry.	Afforestation negatively affects grassland biodiversity. Forestry restoration also problematic.	NGOs involved in some working groups. Comments included in first instance, but deleted later.
Slovakia	EU contribution to RDP budget is 2 billion. 3.6 million to Natura 2000 Forest environmental measures 25,2 million.	There is a substantial number of positive measures but still too much funds allocated to measures negative to biodiversity loss, i.e intensive forestry.	In preparation phase: 3 NGO members, but no real influence of NGOs in committees. No NGOs in monitoring committees.
Estonia	EU contribution to RDP is 714 million. Bio-energy is hot topic both in agriculture and forestry. Drainage is problematic measure (again included in programme).		No proper consultation process. NGO suggestions are not taken on.



A report produced by FERN, *May 2008*

FERN works to achieve greater environmental and social justice, focusing on forests and forest peoples' rights in the policies and practices of the European Union.

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