

Brussels, 13.01.2017

Subject: Bern Convention – Draft Code of Conduct for Planted Forest and Invasive Alien Trees

Dear Mr Brundu,

The **Confederation of European Forest Owners (CEPF)**, the **European Farmers and European Agri-Cooperatives (COPA and COGECA)** and the **European State Forest Association (EUSTAFOR)**, representing the interests of the European forest owners and managers, are grateful for the opportunity to share their views on the draft “Code of Conduct for Planted Forest and Invasive Alien Trees.”

The signing organisations of this letter welcome the efforts made so far and the idea of the Code of Conduct as a tool “to provide guidance for sustainable use of alien tree species in planted forests and to reduce the negative impacts that might originate from the unregulated use of invasive alien trees.”

With regard to the entire process we would like to highlight the importance of the involvement of forest owners and managers as practitioners working in the field, who would eventually be the target group of this voluntary guidance document.

Forests cover over 40% of the EU’s land area and contribute significantly to the social, economic and environmental well-being of Europe. Around 60% of the EU’s forests are owned and managed by approximately 16 million private forest owners, whereas about 30% of forests belong to European governments and are managed by state forest management organizations (SFMOs). While providing around four million jobs and a sustainable source of timber, European forests deliver multiple goods and ecosystem services.

From our perspective it is very unfortunate that the latest draft (III Draft, 24.11.2016) gives ample room for misinterpretations, in particular regarding some tree species which are, since several forest generations, part of our forest ecosystems and provide economic benefits for forest owners and managers as well as for society at large.

Although climate change was not such an important issue in the past, it is now of primary importance when it comes to the condition of and management practices in forest ecosystems as well as species therein. These days forest owners and managers are observing quite dramatic changes of natural ranges of occurrence of trees and other species as well as their pathogens. There is also an observed increase in the occurrence of biotic and non-biotic negative phenomena, which may require propagation of new methods for eradication.

As practitioners, we are convinced that we need to make our forests more resilient and increase their capacity to adapt to changing climatic conditions. Therefore, all possible options should be taken into consideration, particularly introduced tree species or varieties, such as Douglas fir or black locust, that might not be native to a site, but adapted to climate change.

For these reasons we think it is of utmost importance that the Code of Conduct takes a more dynamic and balanced approach to the adaptation capacity of forests to climate change, including the propagation of introduced tree species, in order to ensure continuity of forest ecosystems and their productivity in the long run. The need to look into new possibilities is inevitable in view of climatic change. In this context planted forests can make an important contribution, as they already have in the past, while being managed sustainably.

In general, sustainably managed European forests are a steadily growing and renewable resource. They play an important role in mitigating climate change. Furthermore, introduced tree species are wide spread nowadays and have been used in silviculture in Europe for centuries. They may play a more important role in the future.

Priority must be given to species with the most significant adverse impact on biodiversity and human health and primarily to those not yet present or at an early stage of spread. At the same time, the cost-efficiency principle as well as economic and social benefits arising from the species must be taken into consideration.

Consequently we see statements and footnotes that refer, for example, to Douglas fir as well as certain recommendations for other non-native tree species as highly controversial (e.g. page 15, footnote 30). In particular, Douglas fir has proven to not become invasive, even though it has already been present in Europe for several centuries, nor has it developed any adverse effects on human health. On the contrary, Douglas fir has specifically been afforested as a viable alternative to spruce, which is under severe pressure arising from climate change.

Therefore the signing organisations would like to suggest that the focus of the Code of Conduct should be put on the benefits of introduced tree species as a possible solution to adapt forests to climate change rather than on risks based on assumptions about potential invasiveness and risks to ecosystems and associated services.

Moreover, the wide range of forests in the 47 Member States of the Council of Europe, for whom the Code of Conduct is designed, has to be taken into consideration when giving examples of practices and making recommendations and statements for all Member States. In this respect, from our point of view, these recommendations can be no more than general and common ones and should not refer to any specific figures.

Furthermore, we are concerned that the voluntary document, foreseen to be a guidance document, is too complex in its structure, too lengthy and far too comprehensive in the number of definitions it uses. We are also concerned that it is not properly balanced in reference to the entire topic.

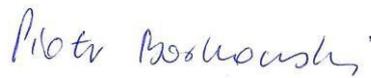
All in all, in its latest version, the benefits of the Code of Conduct, including the link to the existing EU Regulation on Invasive Alien Species (1143/2014), is not clear for forest owners and managers. Therefore, we cannot support the current draft of the “Code of Conduct for Planted Forests and Invasive Alien Trees.

Nevertheless, the signing organisations would like to offer their contribution to the further development of the Code of Conduct and would highly appreciate being involved in its further elaboration. Furthermore we would like, in future, to come back with more detailed comments, when appropriate.

Sincerely yours,



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Secretary General of CEPF



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Executive Director of EUSTAFOR



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