



To the  
Commissioner for Environment, Maritime Affairs and Fisheries, Mr Karmenu Vella

CC:  
Commissioner for Agriculture and Rural Development, Mr Phil Hogan  
Special Adviser for Better Regulation, Dr Edmund Stoiber  
Environment Director-General, Mr Karl Falkenberg

Brussels, 17<sup>th</sup> July 2015

**Subject: 'Fitness check' of EU nature legislation (Birds Directive and Habitats Directive)**

Dear Commissioner,

On 30<sup>th</sup> April 2015, the Directorate-General on Environment launched a public consultation as part of the 'fitness check' of EU nature legislation, more specifically on the Birds Directive and the Habitats Directive, and on its implementation to date.

The Confederation of European Forest Owners (CEPF), the European Farmers and European Agri-Cooperatives (COPA-COGECA), the European Landowners' Organization (ELO), and the Union of Foresters of Southern Europe (USSE) representing the interests of Europe's private forest owners and managers, welcome this initiative.

The signatories of this letter consider both Directives as important tools for enhancing nature in Europe and are convinced that their strategic objectives are still of the utmost relevance for nature conservation in forests. However, it is our shared experience that 23 years after the introduction of Natura 2000 there are still gaps hampering its successful implementation. One common identified reason for this is the insufficient involvement of land owners and managers in the decision-making and implementation processes, in particular at national and regional level. In addition to this, the static approach to nature conservation that does not sufficiently acknowledge natural dynamics as well as the lack of recognition of technological developments in the forest sector are increasingly creating conflicts on the ground. Also, since there is often no clear understanding of the various terms used, e.g. good conservation status, or of the importance of active forest management in Natura 2000 areas, forest owners and managers are hesitant to commit.

The undersigned organisations welcome the opportunity to continue to make an active contribution to the broad fitness check of EU nature legislation. Nevertheless, we feel that the ongoing public

consultation fails to ensure a balanced approach between environmental protection and societal and economic needs. Due to the phrasing of the questions, we are concerned that our answers could be misinterpreted, particularly as the questionnaire provides only very limited possibility to address specific aspects of the Directives that lead to difficulties in their implementation.

When assessing the answers to the public consultation, it is also important to recognise and take into account that rural populations, particularly in remote areas, are less likely to respond to an online consultation, even in their own language. As those living in rural areas are most affected by the implementation of EU nature legislation, it is important that their concerns are taken into account by using other more effective tools. Our organisations call on the Commission to give special consideration to the answers provided by regional, national and European associations representing the actors in rural areas. We also ask to be given the chance to provide comments on the draft report from the consultant.

Forest owners and managers see a real need to improve the implementation of Nature legislation across the EU, allowing for sufficient flexibilities and good governance in terms of stakeholder / land owner participation. We are convinced that these conditions are essential in order to ensure that the directives are indeed relevant, effective, efficient and coherent.

We hope that our concerns will be granted your full consideration.

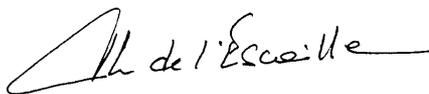
Sincerely yours,



Aljoscha Reuhardt  
Secretary General of CEPF



Pekka Pesonen  
Secretary General of Copa-Cogeca



Thierry de l'Escaille  
Secretary General of ELO



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