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Zasobów Naturalnych Ochrony Środowiska i Leśnictwa  
NSZZ „SOLIDARNOŚĆ”



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**The National Secretariat's of Natural Resources, Environmental Protection  
and Forestry NSZZ "Solidarność" position on the EU Biodiversity Strategy 2030  
entitled: "Bringing nature back into our lives".**

(Hereinafter referred to as the Strategy)

The Independent Self-Governing Trade Union "Solidarność"

on behalf of our entire trade union movement

**calls**

**the relevant structures of the European Union and the Member States**

to undertake a profound dialogue with all the relevant stakeholders, including the representatives of professional groups and the general public and to urgently make the necessary amendments to the goals set out in the EU Biodiversity Strategy for 2030 or reinterpret them in all the implementing regulations, because implementing it in its current form as far as the forest landscapes (integrated set of ecosystems) are concerned – will not serve its purpose, as implementing it in European conditions will lead, among others, to

- 1) further loss of biodiversity, the conservation of which in the current climate conditions is not only a right, but a moral responsibility of humankind;
- 2) increased threat to the sustainability and stability of forest landscapes that results from external human pressure, as well as from natural changes in biotic conditions;
- 3) a significant reduction of the Europe's medium- and long-term natural carbon sink and storage potential;
- 4) the need for public financing of private and state-owned forest holdings;
- 5) loss of hundreds of thousands jobs;
- 6) extension of the supply chain, resulting in the increase of wood products' carbon footprint;
- 7) outflow of capital and relocation of production from the EU to other regions of the world contributing to the growth of CO<sub>2</sub> emissions.

The unilateral approach to the protection of the natural forest environment cannot be considered as a reasonable alternative to the multifunctional and sustainable forest management (SFM). At this point of time, there are no criteria for condition indicators of the forest biome considering their role in creating healthy living conditions for the human kind (from the point of view of restoring "nature for our life").

The new concept of forestry (forest management) may become a good starting point for the work on the reconstruction of the Strategy and its objectives, mainly by means of the new EU Forest Strategy - on condition that global threats to the sustainability of forest landscapes are removed, e.g. from external human pressure, unrelated to forest management. The strategy and its goals should focus primarily on the elimination of this human pressure, instead of undermining the multifunctional and sustainable forest management (SFM), including the protection of the forest natural environment, carried out through diverse forest management actions. Science and practice prove that the multifunctional and sustainable forest management applied for decades in the EU, is the best way to conserve and maintain biodiversity. The latter cannot be effectively warranted solely by the strict protection measures proposed by the Strategy.

### **Justification of the position**

#### Concept ambiguity barrier

The strategy has been developed without a clear and comprehensive definition of key concepts such as strict protection, partial protection, trans-European Nature Network, restoration of ecosystem functions, primary forests or the so-called "old-growth forests". This is a serious drawback, which can only be amended by the inevitable, in our opinion, changes to the Strategy.

#### Biodiversity is an extremely broad term

We wish to draw your attention to the fact that the biological diversity of the planet is an intangible phenomenon, so complex (that it is simply impossible to establish a benchmark of biodiversity without far-reaching simplifications – regardless of what the concept of model biodiversity might even mean from various points of view.



### Issues not sufficiently highlighted in the EU Biodiversity Strategy for 2030

The consequences of the solutions proposed in the Strategy will also include: (1) a drastic reduction in the supply of wood raw material, (2) loss of competitiveness of the timber sector including the loss of the factor of activation and development of rural areas, (3) the requirement for far-reaching modification of the national and European legal order, among others, in the field of environmental protection, in particular in nature conservation, forestry and hunting. The consequences have already been articulated in the statements of certain member states and various international sectoral and social organizations.

### The imperative of covering forest landscapes with multifunctional and sustainable forest management (SFM)

The abandonment of multifunctional sustainable forest management (SFM) on large areas would be a cardinal mistake. So far, SFM has proven to be a good instrument for ensuring the sustainability and development of forest ecosystems, including shaping forest biodiversity, as seen in the context of "axiological" social demand for direct or indirect contact with forests. It has also proved to be an effective tool for realizing the non-productive function of storing natural wealth within forest landscapes for future human needs. The real use of forests for shaping the conditions of health, life and development of a human being takes place through the implementation of productive and non-productive functions of forests within the framework of multifunctional sustainable forest management. This function - in the situation of human pressure and possibly natural biotic changes - should not be overestimated. Presently there are no developed patterns of biodiversity as indicators of proper condition of forest landscapes - from the point of view of broadly understood social interest of forest management of functions other than the non-productive function of storing natural wealth for future potential human needs. The abandonment of forestry activities will adversely affect the conservation of biodiversity and, through its negative socio-economic effects, may contribute to inhibiting the most important challenge of the 21<sup>st</sup> century, which is management based on the principles of sustainable development.

The concept of multifunctional forestry as an alternative to the idea of monofunctional forests and to the demand for economic deactivation of large areas of forest land, including stands of older age classes

The concept of multifunctional forestry based on the principle of sustainable forest management has been successfully implemented for almost three decades on a large scale in the state forests of Europe. The example of the Polish State Forests proves that it can be implemented while maintaining wide social benefits and natural resources without generating huge burdens for the state budget. The approach to fulfilling non-productive forest functions separately from productive functions in a mono-functional approach, as well as the concept of economic inactivation of large areas including forests of older age classes, are harmful concepts, which may result in the dependence of forestry on financing from public funds.

What is this really about?

Since there is no established standard of biological diversity for forest landscapes, a fundamental question should be asked, one which is even rhetorical in nature, **whether the strong requirement of bringing nature back into human's life is not to serve (at least in relation to forest landscapes) the purpose of maintaining the current polarization of prosperity in Europe and in the world, at the expense of the development opportunities of those, who are less privileged for historical reasons, while formally staying in accordance with the binding law and only pretending that the doctrine of sustainable development is respected.**

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