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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

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Complaint on stand-by: 2023/02

**Alleged damage to protected habitats and species due to logging
activities in the Belpau Emerald Network (CH0000028)**

-COMPLAINANT REPORT-

Prepared by Biofuelwatch

Update on Complaint No. 2023/02: Switzerland: Alleged damage to protected habitats and species due to logging activities in the Belpau Emerald Network (CH0000028)

Biofuelwatch, 22 April 2026

Executive summary

In light of the Standing Committee's Bureau meeting on 18–19 June 2026, Biofuelwatch submits this formal follow-up to Complaint No. 2023/2 as a direct rebuttal of the points raised in the Swiss Government's 2025 response. We believe that Switzerland continues to be non-compliant with Articles 1, 3, 4, 6, and 11 of the Bern Convention. This is based on evidence of further destructive logging in the Belpau Emerald Network site ("Belpau" below), and the fact that the Federal Office for the Environment (FOEN) has rejected the complaint despite admitting to habitat degradation and a selective monitoring strategy that ignores forest-dwelling species in favour of industrial forestry, municipal infrastructure and recreational utility. We believe that this fits a systemic pattern of institutional negligence: by missing formal Bureau deadlines in this case and simultaneously defending controversial "preventative wolf culling" (Case 2023/3),¹ the FOEN continues to prioritise cantonal autonomy and economic utility over its international treaty obligations. Given these substantiated breaches and the ongoing degradation of the Belpau Emerald Network site, we urge the Bureau to elevate this matter to an Open File in order to address the severity of these conservation failures and to compel transparent, proactive engagement from the Swiss authorities.

1. Update of activities at the Belpau site

The Swiss Government's attempt to localise logging impacts within the 38.2 hectare (ha) *Obere Belpau* forest reserve is factually inaccurate. On-site assessments, corroborated by satellite data (Annex 4), confirm that silvicultural interventions have occurred across the broader 426 ha Emerald Network site. Beyond the targeted clearing for the 2025 pipeline and the forest reserve transition, Biofuelwatch has documented evidence of logging distributed throughout the site, including in critical riparian zones and forest stands outside the designated forest reserve boundaries. We believe that this widespread extraction constitutes a violation of Article 4.1 and 4.2, as the State has failed to ensure the administrative and planning measures necessary to protect the ecological integrity of the entire designated site.

Under the Swiss forestry framework, forest reserves² are categorised as either natural reserves (non-intervention) or special reserves (active, "targeted" management). Given its international status, the Belpau should be managed as a natural reserve to ensure the long-term survival of protected species. Instead, the authorities have utilised the "special reserve" classification to facilitate a high-intensity *taillis sous futaie* (coppice with standards) model. Furthermore, the characterisation of these activities as *taillis sous futaie* is a technical misnomer used to mask the severity of the ecological disruption. While traditional coppicing involves the historical, low-impact rotation of understory growth, the current interventions in the Belpau represent a much more radical, industrial-scale extraction. These operations involve heavy machinery and the removal of significant biomass, resulting in abrupt canopy loss and the systematic elimination of standing deadwood and veteran trees. By applying a traditional label to a modern, high-intensity extraction model, the authorities are obscuring a fundamental shift from "habitat management" to "resource exploitation," further undermining the protective spirit of Article 6.

The justification of "public safety" for these interventions is scientifically contradictory. In mature alluvial forests, structural stability is provided by a dense, closed canopy. The transition to a thinned *taillis sous futaie* model increases insecurity by exposing previously sheltered trees to wind-loading.

¹ [New wolf culling policy \(Switzerland\)](#), New complaint 2023/3

² [Réserves forestières](#), FOEN, 2024

The Government's admission that past interventions resulted in "stand destabilisation" confirms that current forestry practices are a primary driver of windthrow and windsnap (Annex 2). Moreover, the legal status of the Belpau as a nature reserve mandates that management prioritises the ecological requirements of protected species over anthropocentric safety concerns. Rather than degrading the habitat to mitigate visitor risk, the authorities should manage public safety through access restrictions, ensuring that civil liability does not supersede international conservation obligations.

Using the resulting fallen timber as a pretext for further "sanitary" logging creates a destructive feedback loop: thinning induces structural failure, which is then used to justify the continuous removal of mature habitat under the guise of hazard management. This systematic reduction of forest maturity and deadwood biomass in our view constitutes a violation of Article 3.1, as the State has failed to maintain the ecological requirements of the site. Furthermore, the authorities have formally admitted that several protected species are no longer present. By facilitating the decline of these populations through habitat simplification, rather than ensuring the "Satisfactory/Favourable Conservation Status"³ required by the Convention, the State is overseeing a documented erosion of the site's biological baseline.

2.a. Management of deadwood and habitat trees

The Government's assertion that treated stands have "resisted disturbances" and that uprooted trees are "largely left on site" is factually incorrect. Far from demonstrating resilience, these thinned stands experienced significant instability across the entire Emerald Network site—not just within the *Obere Belpau*—with 2023 being a particularly devastating year for windthrow and windsnap. Contrary to claims of deadwood retention, field investigations (Annex 2) reveal the presence of multiple fresh stumps throughout the site, providing irrefutable physical proof that uprooted and damaged trees are being harvested. This ongoing extraction of high-value habitat structures, particularly large-diameter oaks, constitutes a violation of Articles 4.2 and 6, as it represents a deliberate deterioration of the site's ecological character.

The proposal to achieve a target of 10 large-diameter trees (>50cm) per ha over a 35-year horizon is an admission of current ecological insolvency. For an Emerald Network site, the preservation of *existing* veteran structures is requisite to ensure a "Satisfactory Conservation Status." The State's formal admission that several species of birds and bats are no longer present confirms a catastrophic "habitat gap." By cutting down mature trees while managing for a distant future target, the authorities are ensuring the site remains unsuitable for the return of these and other Emerald species—a further breach of the protection mandates stipulated in Articles 4.2 and 6. And habitat trees continue to be felled, most recently during the 2026 intervention in the forest reserve (Annex 3).

The State's target of five deadwood trunks per ha (>20 cm diameter, at 40 m³/ha) is ecologically insufficient. Scientific consensus suggests that a threshold deadwood value of 100 m³/ha should be the minimum target⁴ for such sites, while the World Wildlife Fund (WWF) identifies⁵ up to 200 m³/ha as the benchmark for unmanaged broadleaf forests. By setting targets at the lowest possible denominator, the authorities are managing for a degraded baseline.

³ [Resolution No. 8 \(2012\)](#) of the Standing Committee, adopted on 30 November 2012 and [Strategic Plan for the Bern Convention for the period to 2030](#), adopted in 2023

⁴ [Natuurherstelwet roept op tot ecosysteemherstel: meer rewilding kan goed helpen](#), ARK Rewilding Nederland, 2025

⁵ [Deadwood - living forests - The importance of veteran trees and deadwood to biodiversity](#), WWF Report, 2004

Furthermore, the admission that “no quantitative inventory has yet been carried out” invalidates claims of threshold compliance. Executing high-intensity logging without a baseline inventory is a breach of the precautionary principle and renders the State’s claims of “compliance” anecdotal. Under Resolution No. 8 (2012), management must be based on verifiable scientific data; the failure to provide this evidence-based oversight constitutes a violation of Article 3.1.

2.b. Pre-felling inventory procedures

The reliance on “internal marking” by cantonal authorities lacks the independent scientific oversight required for a site of international importance. There is a fundamental conflict of interest when the agencies responsible for meeting timber production targets also serve as the primary assessors of ecological value. This closed administrative loop, in our view, violates Article 3.1, as the State has failed to establish a transparent national policy that ensures conservation takes precedence over regional economic utility.

The industrial character of the site is further evidenced by the extensive application of multi-coloured spray markings and symbols on trees throughout the Emerald Network site. While most prominent within the forest reserve, this marking is pervasive across the entire reserve. Such intensive coding is a testimony to a production-led forestry model rather than a preservation-led sanctuary; it prioritises the logistical requirements of timber extraction over the maintenance of a natural, non-interventionist forest character.

Marking an individual tree for preservation is ecologically irrelevant if the surrounding canopy is thinned to the point of structural failure. As evidenced by high rates of windthrow and windsnap acknowledged by the Government, the removal of neighbouring “sanitary” timber exposes retained oaks and remaining trees to severe edge effects. Recent research⁶ confirms that microclimatic desiccation isolates habitat trees within a compromised environment, rendering them vulnerable to secondary stressors and structural collapse.

2.c. Impact on riparian zones and thermal regulation

The Government’s stated need to “restore shade levels” is an implicit admission that previous interventions have already compromised the river’s thermal regulation. Proposing further “silvicultural interventions” to restore shade is circular logic; the most effective way to maintain water oxygenation and temperature is to cease the removal of mature canopy trees and prevent the soil compaction caused by heavy machinery. Furthermore, the use of “security distances” lacks scientific quantification and fails to account for the microclimatic edge effects caused by nearby logging.

Claims of non-intervention along the Aare are demonstrably false. A series of large-scale hydraulic engineering projects has resulted in the persistent removal of mature riparian vegetation along the left bank, including all trees along 1 km at *Giessen* (2014–16),⁷ numerous mature trees along 850 m of the *Fahrhubelweg* (2019–23),⁸ and around 1,000 m² at *Austrasse* (2025).⁹ Trees are also periodically and incrementally removed “to let in light,” mostly along the left bank. Such removal constitutes a cumulative breach of the non-deterioration mandate (Article 4.2). By consistently prioritising timber extraction, hydraulic engineering, leisure facilities and municipal infrastructure over ecological requirements, the State has overseen the physical destruction of the riparian integrity it is treaty-

⁶ [A unifying framework for understanding how edge effects reshape structure, composition and function of forests](#), 2025, R. B. Morgan and T. Jucker

⁷ [Flood protection Selhofen \(left bank of the Aare\)](#)

⁸ [Flood protection Farhubel](#)

⁹ [Press release 2024, Canton Bern](#): Temporary clearing for a drinking water pipeline

bound to protect. The biomass from such clearings should remain *in situ*; instead, it is invariably extracted and largely burnt for energy wood, some was used in the engineered logjams along *Farhubelweg*. This systematic liquidation is a violation of Articles 6 and 3.1.

2.d. Monitoring of protected fauna and targeted measures

The Government's reliance on aquatic "success stories," such as *Coenagrion mercuriale*, serves as a methodological diversion from the site's broader ecological decline. While these specific records are positive, the FOEN provides no data for the forest-dwelling species most impacted by canopy removal. Although the Standard Data Form¹⁰ lists 86 protected or important species, monitoring is strategically absent for the 225 ha of deciduous forest currently under industrial pressure. By ignoring the specialist fauna, flora, and fungi most vulnerable to logging, the authorities are managing the site based on anecdotal "close-to-nature" claims rather than the rigorous scientific oversight required for a high-priority sanctuary.

This selective monitoring strategy constitutes a simultaneous violation of Articles 3.1, 4.2, and 11, as the State has failed to implement a conservation policy addressing the requirements of all protected species or to facilitate the rigorous data exchange necessary for the Convention's effectiveness. By excluding forest-dwelling specialists from its research focus, the Government has failed its obligation to provide a sound scientific basis for management. Under Resolution No. 8 (2012), management must be based on a "Satisfactory Conservation Status" for *all* designated species; the current failure to track the populations most vulnerable to logging represents a fundamental breach of these international monitoring mandates.

3.a. Planned silvicultural measures and indicative timetable

The 2025/26 management calendar confirms a commitment to high-intervention silviculture that systematically prioritises open forest structures and light-loving (thermophilic) species, such as undefined "wild bees." This focus on vague, non-specialist groups over known Emerald species represents a scientifically questionable approach to conservation. By framing the removal of mature canopy as a "restoration" measure for these unmonitored generalist species, the authorities are bypassing the strict protection requirements for the forest's actual biological priorities. This provides a convenient mandate for canopy removal, creating a perverse financial incentive: federal biodiversity subsidies are disbursed to perform the very logging that generates commercial timber revenue. This circular funding mechanism—where landowners are paid to cut and then paid again to "care for" the resulting young stands—appears to be a violation of Article 3.1, as it incentivises habitat simplification over the stable, mature conditions required by at risk species.

3b Suspension of Silvicultural Measures

Despite the Government's announced 2024/25 logging suspension, operations have since proceeded as planned in the northeastern sector of the Belpau. Although this area sits just outside the formal forest reserve, it remains part of the protected site and should not be subjected to the *taillis sous futaie* regime. Nevertheless, recent interventions have resulted in the systematic removal of critical habitat structures—including an ancient, ivy-clad ash and mature beeches—while inflicting significant mechanical damage on the remaining trees and soil (Annex 3).

As the Government admitted, "temporary clearing" for a drinking water pipeline proceeded despite the declared suspension, which we believe to constitute a further breach of Article 4. The removal of mature canopy and the resulting permanent soil compaction from heavy machinery (Annex 6) inflicts long-term, not temporary, damage on the site's biological capacity. All timber was extracted, much of it was chipped for bioenergy. This prioritisation of municipal infrastructure and timber value recovery

¹⁰ [Emerald Standard Data Form Belpau](#)

over the site's non-deterioration mandate is, we believe, a violation of Article 3.1, representing a failure to ensure that conservation objectives remain the primary management driver.

4. Communication and stakeholder involvement

As previously noted, the Swiss Confederation has delegated management of the Belpau to the Canton of Bern and local landowners, creating a structural conflict of interest where timber profit motives compete directly with conservation duties. This arrangement is particularly compromised by the fact that cantonal foresters in Bern are often employees of the *Bürgergemeinden* landowners—the very entities whose commercial goal is to supply woodchips to local biomass plants and timber to sawmills. This dual role ensures that industrial production is prioritised over the Article 3.1 obligation to promote national policies for the conservation of natural habitats.

Within this framework, we believe that the Government's emphasis on local signage serves as a strategy of institutional deflection. While a sign for "Stag Beetle conservation" was located on-site—instructing visitors to "leave stumps where they are" (Annex 5)—it serves as mere window dressing for public perception, directly contradicted by the state-sanctioned removal of natural windthrow across the wider Emerald Network. These woodchip-covered stumps are anyway ecologically inferior to natural veteran structures, as they risk larval mortality through fermentation-induced overheating and desiccation. Furthermore, the practice of leaving log piles to dry across the site before chipping creates "ecological traps" that attract oviposition only to destroy the larvae, directly undermining the site's conservation objectives. We believe that this failure to provide scientifically sound mitigation, while prioritising aesthetic "branding" over biological reality, is a violation of Article 4.2.

Moreover, there are still no signs marking the site as an Emerald Network sanctuary. Therefore, the public remains unaware of the site's international legal status, allowing the State to frame destructive activities—such as the 2025 pipeline clearing—as minor municipal works. We believe that neither a public signpost nor a press notice regarding "temporary deforestation" mitigates the physical breach of Article 4, nor do they satisfy the State's obligation to ensure the long-term survival of the site's ecological integrity.

We regard the Government's reliance on selective "round tables" as inconsistent with the spirit of Article 3.3. By excluding the Fondation Franz Weber, the authorities have bypassed a critical expert voice that provided specific, federally certified warnings regarding the risks of windthrow caused by radical canopy removal (Annex 1, Point 2). Furthermore, despite explicit assurances of consultation, the Foundation's federal expert was not notified when logging commenced. Upon a subsequent site inspection, the expert described the scale of the intervention as "shocking" and fundamentally incompatible with the status of a nature reserve. This restricted approach to dialogue suggests that these meetings function more as a closed consultative process than a comprehensive review of silvicultural impacts. By disregarding independent evidence that thinned stands would face structural instability, the State has prioritised administrative expediency over the precautionary principle and the procedural transparency required by the Bern Convention.

5. Conclusion and formal requests for redress

We believe that in rejecting the Belpau complaint, the FOEN ignores substantive evidence of habitat degradation in favour of a managed industrial transition. By the State's own admission, the authorities lack the quantitative data necessary to support their claims of compliance, while monitoring programs strategically bypass the forest-dwelling species most impacted by logging. This pattern of institutional non-compliance—characterised by missed Bureau deadlines and the prioritisation of cantonal autonomy over international treaty obligations—suggests that the rejection of this complaint is a political necessity rather than a scientifically backed conclusion.

To establish an objective baseline for the evaluation of the Belpau Emerald Network site (CH0000028), Biofuelwatch formally submits the following requests to the Standing Committee:

1. Comprehensive 15-year quantitative dataset: a detailed accounting of all timber volumes extracted and the specific number of large-diameter habitat trees (>50cm) removed under “sanitary” or “safety” justifications from 2012 to the present.
2. Financial transparency of subsidies: disclosure of the total financial subsidies granted to landowners for the supposed *taillis sous futaie* transition, biodiversity and maintenance projects across the entire Emerald Network site to determine if management is driven by ecological necessity or a circular financial mechanism that incentivises habitat simplification.

The Swiss authorities continue to treat the Belpau as a multi-use utility zone rather than a primary biodiversity sanctuary. Given the documented and admitted failures to protect the site’s biological integrity, we formally urge the Bureau to elevate this matter to an Open File.

Biofuelwatch, 22 April 2026

Annex 1 - follow-up originally submitted to the Bureau in December 2024

Pursuant to Biofuelwatch's original complaint ([T-PVS/Files\(2023\)34](#)), its follow-up ([T-PVS/Files\(2024\)38](#)) and the Swiss Government's reply ([T-PVS/Files\(2024\)56](#)), Biofuelwatch would like to:

A. Draw the Committee's attention to the fact that, earlier this month, the canton of Bern authorised the "temporary clearing" of four hectares of forest (equivalent to five football fields) in the Belpau in order to lay a drinking water pipeline. According to the cantonal [press release](#), "securing the drinking water supply is considered to be of overriding public interest" and the logging will be carried out "by the Burgergemeinde Belp on behalf of the canton and municipality."

B. Express deep concerns at the Swiss government's reply to our complaint, notably the admission that sil- vicultural interventions have removed excessive dead wood and old trees, with deleterious repercussions on a number of species and habitats. We question the apparent lack of species monitoring and Environmen- tal Impact Assessments (EIA) ahead of logging; the continued absence of Emerald Network signposts and indeed promotion; and the admission that contracts have been drawn up with forest owners. The announ- cement that the Special Forest Reserve could be extended into the "Untere Belpau" is further cause for concern, as it will pave the way for further silvicultural interventions.

C. Draw the Swiss Government's attention to the Council of Europe's stated [ultimate objective of the Emer- ald Network](#), which is: "the *long term survival of the species and habitats* of the Bern Convention requir- ing specific protection measures. These habitats and species are listed respectively in [Resolution No. 4 \(1996\)](#) and [Resolution No. 6 \(1998\)](#) of the Standing Committee to the Bern Convention. Once the areas pro- posed are officially adopted as Emerald Network sites, they have to be designated and *managed at national level*. The national designation and management measures are decided and put in place to contribute to the main objective of the Network and their *efficiency will be regularly monitored*." (Italics added). Moreover, in the *Draft recommendation on the further clarification of the obligations of Contracting Parties regarding the conservation of Emerald Network sites*, drawn up at the 44th meeting in Strasbourg this month, it is clearly stipulated that "timely and comprehensive impact assessments" are required *before* the approval of any project for the habitat involved and that projects incompatible with conservation objectives should be re- fused.

In more detail, therefore.

1. "Long term survival of the species and habitats"

Biofuelwatch would like to point out that the Belpau (CH0000028) was proposed as ASCI (Emerald) in 2009 and was accepted in November 2012 as an "alluvial zone of national importance—the Belper Giessen—and an adjoining beech forest" ("zone alluviale d'importance nationale Belper Giessen et à une hêtraie at- tenante au NE") and that its quality and importance rest upon, among others, the presence of "significant populations of amphibians", according to the [Standard Data Form](#), which also lists a number of species which the Swiss Government now admits are no longer "Present" just 12 years later.

a. Species

With regard to amphibians and according to the [OECD's Data Explorer](#), 73.7% of studied species in Switzer- land are threatened, which puts the country third from bottom out of 35 OECD countries.

Despite the Belpau being a nationally and internationally recognised site for amphibians, the Swiss Government's reply claims that "most of the amphibian species mentioned in the complaint do not occur over a large area" and focuses on just five of the ten species supposedly present, claiming they represent "isolated cases".

The ten species cited in Biofuel's complaint are all species which were declared "Present" on the original [Standard Data Form](#) and ten species, not five, are also mentioned in the Federal Office for the Environment's (FOEN) [description of the Belpau](#)

Surely the aim of the Belpau is not just to protect existing populations of amphibians, however "isolated", but also to promote their expansion? Neither objective seems to have been achieved.

While it is true that amphibians do in general like to bask in sunlight, it is also true that most travel to and from and hibernate in the surrounding forests, which makes them extremely vulnerable to logging activities, especially during the autumn, winter and spring months.

With the exception of the Midwife Toad (*Alytes obstetricans*) which tends to stick close to water and [does not usually travel](#) further than 100-150 m to its hibernation sites, the other species can migrate considerable distances, putting them at even greater risk. Midwife toads are however particularly sensitive to the type of habitat modification which is also regularly carried out in the Belpau.

The Yellow-Bellied Toad (*Bombina variegata*), a deciduous forest specialist, has been known to travel [2-3 km in search of new territory](#). It is particularly vulnerable to logging as it hibernates among others, under logs and among roots of trees. Similarly, the Common Tree Frog (*Hyla arborea*) can migrate [up to 4 km](#) and it too hibernates underground as well as in holes in trees. Some young Palmate Newts (*Lissotriton helveticus*) have been known to migrate [up to 1 km](#).

As documented previously, logging activities, site modifications and flood mitigation work have been observed during the autumn, winter and spring months, all along the reserve's left bank, with more heavy machinery entering subsequently well into summer months to chip woodpiles (examples below).



With regard to birds and according to the [OECD's Data Explorer](#), 37.1% of studied species in Switzerland are threatened, putting the country third from bottom out of 36 OECD countries.

The admission that several species of woodpecker which were once present have not been observed recently is alarming but hardly surprising given the intensity with which old trees are harvested. Official sightings of the Green Woodpecker (*Picus viridis*), which requires old trees in which to excavate its nests, apparently now "occur mostly outside the reserve". Yet this species is largely sedentary and studies have shown that the median recovery distance for adults is 1 km (3 km for juveniles). The Great Spotted Woodpecker (*Dedrocopos major*) is a forest specialist that requires [large trees and rather dense arboreal vegetation](#) to feed as well as to breed, which can be as early as January.

It is hardly surprising that this relatively common species hasn't been recorded this year.

But the most egregious disappearance is that of the Middle Spotted Woodpecker (*D. medius*) which hasn't been sighted in the reserve since 2016. Europe holds 75% of the world's population (10,000–22,000 pairs) of this mature broadleaf forest, rough-bark tree specialist which is highly vulnerable to precisely the forest clearances and radical changes in forest management practised in the Belpau. While oaks are usually spared, other rough-barked trees such as old ash are not. Moreover the extensive logging has resulted in unacceptable windthrow, including of oak which is rapidly removed from the reserve.

With regard to mammals and according to the [OECD's Data Explorer](#), 34% of studied species in Switzerland are threatened, putting the country third from bottom out of 34 OECD countries.

The Swiss Government's reply states that Bechstein's bat (*Myotis bechsteinii*) "doesn't exist in this zone" and that sightings in the region date back to 1994, yet the species is marked as "Present" in the [Standard Data Form](#) drawn up in 2004-5. Around 4/5 of Swiss bats use forests to roost and/or hunt in and almost half spend part of the daytime resting in tree cavities which are also important mating and overwintering sites. Large, old habitat trees are however growing increasingly rare in the Belpau.

With regard to the Belpau's second Emerald mammalian species, the beaver (*Castor fiber*), while damage has not been documented to either dams or lodges, vegetation is being extensively removed around beaver ponds and lodges, exposing the latter to footpaths and dog walkers. The Government speaks of "an exceptionally high density" of beavers in the Belpau but fails to provide any figures. Moreover, will the Belpau's beaver be guaranteed protection in view of the [modified Hunting Ordinance](#), which if adopted would allow the shooting of "problem" animals?

Finally, signs of hunting and baiting (barrel filled with corn usually used to attract roe deer, pictured page 4) have been recorded within the perimeter of the Belpau. Local nature associations were informed but nothing was done. The barrel along with mounds of cigarette butts were noted in March 2023. It could very well still be there ([click for precise location](#)).

b. Habitats

The [EUNIS units](#) describe the Belpau as being composed predominantly of broad-leaved deciduous woodland (53% N16 habitat), particularly beech (G1.6 Fagus woodland), and inland water bodies (26% N07 habitats).

As Biofuelwatch has documented, beech is one of the species most targeted in the Belpau and it is extensively logged, including old habitat trees, so much so that it is hard to know where the beech forest mentioned in the [Standard Data Form](#) actually is.

The alluvial nature of the Belpau is frequently cited, yet a dyke has been erected all along the left bank to mitigate flooding which prevents the free flow of water. Plans to restore the area's alluvial character have been thwarted both by the local community and the fact that the "Obere Belpau" doubles as a water catchment for the city of Bern. It is therefore somewhat disingenuous to speak of an alluvial forest when it is nothing of the sort.

The government's claim that "there is no evidence of eutrophication in excess of general nitrogen deposition in Switzerland", is hardly a benchmark when [90% of Swiss forests](#) are affected by excessive nitrogen inputs. Swiss forests receive on average 19.4 kg/ha/year of nitrogen which is far superior to the 10-15 kg/ha yearly maximum recommended for deciduous forests. This figure is very likely much higher in the Belpau which is surrounded by agricultural land, much of which is given over to livestock. Inputs of 60 kg/ha per annum have been recorded in forests on the Swiss Plateau.

Increased nitrates and ammonium lead to soil acidification, with knock-on effects on soil invertebrates and fungal mycorrhizae as well as on algal blooms and oxygen levels in waterbodies. It certainly explains the proliferation of both neophytes as well as nettles and brambles which take over following logging in the Belpau. The objective of “letting in light in this area” is largely negated by this rapid recolonisation of sub- vegetation which is not being cleared (photos below, all taken in 2024).



It also explains the eutrophication recorded in many of the Belpau’s standing bodies of water.

The fact that most of the wood extracted from the Belpau is burnt as biomass in four large local burners only compounds the problem.

2. “Designed and managed at national level”

Switzerland has set aside barely [1.6% of its territory](#) as Emerald sites, 12 times less than the EU as a whole, placing it at the bottom of Europe, [second only to Liechtenstein](#). Yet even these sites are heavily exploited.

The government claims the Special Forest Reserve of the Obere Belpau is exploited “traditionally” as a “coppiced forest.” Observations on the ground from 2019 to the present day (photos below), supported by [Global Forest Watch data](#), clearly show that this area of the Belpau has been industrially logged. The announcement that the Special Forest Reserve could be extended is therefore not good news and will help justify more logging.

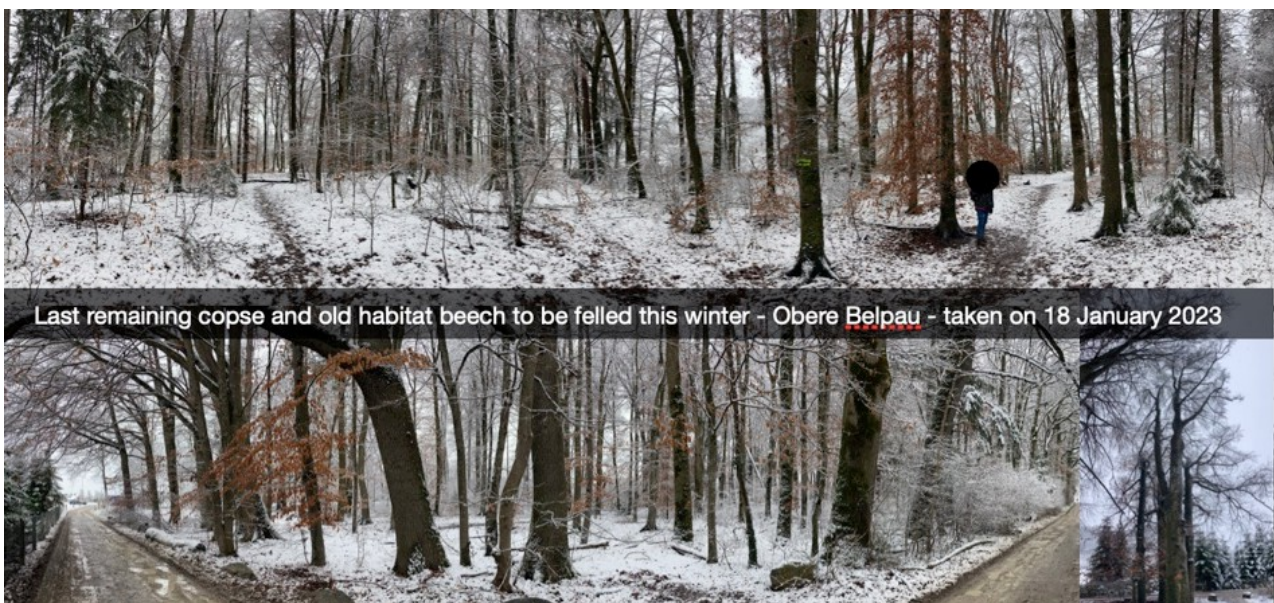


Furthermore, as far as Biofuelwath is aware, the only Management Plan drawn up for an Emerald Network was that published for the Oberaargau ([CH0000040](#)) by the [Verein Smaragdgebiet Oberaargau](#). And while the decision to carry out a survey of dead wood and Emerald species is timely and must be applauded, the question remains as to why this was not done sooner.

The Swiss Government has also admitted that too many old trees and dead wood have been extracted from the Belpau, but that this deficit has been acknowledged and taken into account in the new management contracts of 2022. Yet old trees continue to be targeted and windthrow resulting from the excessive interventions continues to be removed from across the Belpau (photos below).



As detailed in Biofuel's follow-up, the last large trees in the Obere Belpau adjacent to the Special Forest Reserve are to be felled this winter due to "safety concerns", leaving virtually only the old oak (pictured on page 5 bordering the road). This copse has to date withstood the extreme weather events which toppled many of the isolated trees spared in the recent surrounding logging operations. Moreover, a federally certified tree specialist working on behalf of the [Franz Weber Foundation](#) — an association trying to save this last patch of forest — has argued that removing the trees from around the old oak will make the latter vulnerable to windthrow. The forest owners (the Burgergemeinde Belp) are pressing ahead regardless and have agreed to spare just one old ash (*Fraxinus excelsior*), a designated habitat tree estimated to be some 100 years old, on condition that [Baumpflege Dietrich GmbH](#) — a tree surgery company — assumes responsibility for securing the tree which will include removing all dead wood. The company has accepted and the costs will be borne by the Franz Weber Foundation. Yet, according to the tree specialist, all the trees bordering and overhanging the road will require similar maintenance to make them safe following the intervention. The Burgergemeinde Belp however doesn't deem it necessary to prune the oaks, which makes their singling out of the ash highly questionable. This winter's intervention is also problematic from a security point of view because it will leave the spared trees exposed, thus posing a greater risk to the public. The best option both in terms of safety and biodiversity would therefore have been to do nothing.



Biofuelwatch would like to point out that, in the canton of Bern, cantonal foresters are also often employed by the Burgergemeinden (burger communities). This is the case in the Belpau where the cantonal forester is employed by the Burgergemeinde Belp, which owns much of the Belpau's left bank forests and whose stated goal is "to deliver [10,000 m3 of woodchips annually](#), supplying 4 local biomass plants."

Yet the Burgergemeinde Belp also receives financial aid in the form of subsidies to promote biodiversity. How is this not a conflict of interest? Moreover, how is this state of affairs compatible with the requirement for Emerald Networks to be "managed at national level"?

3. "Their efficiency will be regularly monitored"

The Swiss Government's reply raises more questions than it answers. Does a Management Plan exist and if not, will one be established? Have species been recorded and monitored in the Belpau in the years since the reserve was established? The Guide "Assainissement des biotopes d'importance nationale" is telling. Despite being published in 2023, the last recorded study in the Belpau seems to date to 2015 and mentions just the beaver and one dragonfly.

Moreover, logging in the Belpau continues unabated and old trees are still being removed (photos below, all taken on 13 December 2024) despite Government assurances to the contrary. Was an EIA drawn up before the planned 4 hectare pipeline intervention? And how can a local burger community and a cantonal forester be mandated with logging this nationally and internationally important nature reserve?

The fact that Switzerland has not aside just 1.6% of its territory as Emerald Network is shocking



All three photos taken 13 December 2024

Annex 2 - Windsnap, windthrow and salvage logging

Windsnap (red arrow), windthrow (mostly oaks and beech) in the forest reserve, subsequently removed (6.11.23). Salvage logging as evidenced by destabilised stumps (white arrows) across the Belpau (1.4.26).



Annex 3 - Silvicultural intervention 2026 including the felling of habitat trees (March & April 2026)



Annex 4 - tree cover loss (till 2024)

The logging intensity within the Belpau, especially within the forest reserve, is indistinguishable from that of the adjacent commercial stands, effectively nullifying the site's protective designation.

Annex 5 - stag beetle sign and pile



Annex 6 - Drinking water pipeline (photos March 2026)



Source: Google Earth Pro

March 2025

July 2025

4 hectares, clearcut during the breeding season, including 1,000m2 along the Aare (C)