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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

41st meeting
Strasbourg, 29 November – 3 December 2021

Follow-up to Recommendation No.190 (2016)

**Recommendation No.190 (2016) on the
conservation of natural habitats and wildlife,
especially birds, in afforestation of lowland in
Iceland**

- REPORT BY THE NGOs -

*Document prepared by
Fuglavernd / BirdLife in Iceland*



Fuglavernd

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Reykjavík 11 June 2021

Dear Mrs Sticker,

Recommendation No.190 (2016) of the Bern Convention Standing Committee, adopted on 18 November 2016, on the conservation of natural habitats and wildlife, specially birds, in afforestation of lowland in Iceland.

I write to inform you that we have grave concerns that Iceland's draft nation-wide plan for forestry (NWPFF), on which comments are invited by 18 June, fails to take account of key 2016 recommendations of resolution no. 190 of the Bern Convention Standing Committee on this case, for example those on:

5. a national indicative forestry strategy
6. the country-wide scheme for long-term monitoring of waterbirds and their habitats (evidence suggests that the forestry will cause population declines in a number of important species)
7. EIA legislation
8. an evidence-based approach to support locational guidance for forest planting
9. National Biodiversity Strategy and Action Plan
12. Guidance on good environmental practice in afforestation eg on alien invasive species

This is especially regrettable as in fact since 2016 there has been much progress in line with the AEW/Bern recommendations by the Environmental Institutes, which would be undermined by the plan.

The major problem that remains is that Icelandic law, especially on environmental impact assessment and construction monitoring, fails to take into account cumulative impacts on biodiversity of multiple, dispersed small tree plantings and is difficult to implement at local government level. It is vital that any national forestry plan undergoes a Strategic Environmental Assessment to consider the cumulative impacts at national and international level.

We believe it would greatly help the Minister of Environment to ensure that the forestry plan is improved in line with the Bern convention SC recommendations, before it is adopted, if Bern Convention secretariat were accordingly to write expressing concern about this matter, including in support of the criticisms of two of the Committee members appointed to oversee the development of the plan – see point 3 below in the following further background information:

1. In June 2019 the Ministry for the Environment and Natural Resources nominated members of a working committee to prepare the NWPFF to state national policies regarding the status and future of forests in Iceland. In relation to environmental issues the plan was to cover:
 - a. How land selection for forestry takes into account interests related to nature conservation, cultural heritage and landscape values.
 - b. Conservation and restoration of natural forests.

- c. Forestry and biological diversity.
 - d. The list of species to be used for forestry, which should not include alien invasive species.
2. The committee introduced a draft of the plan on 7th of May 2021 (<https://protect-eu.mimecast.com/s/NPoLC31L1t2P7qZsY7C4O> - 67pages – (Attached but only in Icelandic: Drög að landsáætlun í skógrækt 2021-2025)).
3. However, the committee did not unanimously agree to the results. Two members, Tómas Grétar Gunnarsson and Salvör Jónsdóttir, submitted a memorandum (“Minnihlutaálit við drög að landsáætlun í skógrækt -10pages”) criticizing the NWPF draft mainly on environmental related issues, including on the grounds that it:
- a) fails to address the adverse impact on bird populations.
 - b) prescribes tree species all but one of which are alien to Iceland, and several of which, particularly the lodge pole pine, are known to spread easily in Iceland and are classified as invasive in most countries; the plan does not address the issue of controlling such species but for a number of reasons, including the precautionary principle, it certainly should do.
 - c) fails to take into account Iceland’s unique and outstanding biodiversity and the national and international laws under which it should be conserved
 - d) fails to take into account any national or municipal plans relating to nature conservation and agriculture.
 - e) fails to consider the AEWA and Bern Convention recommendations on forestry in Iceland.
 - f) if accepted and followed has the potential to affect adversely the Icelandic biota for the foreseeable future, and the financial costs incurred by the Icelandic society could be considerable.

The memorandum concludes that a better and a more rational forestry plan is needed if any common agreement is to be reached on forestry in Iceland.

4. Furthermore, ongoing research by a respected international team of scientists (with a manuscript about to be submitted to a peer-reviewed journal—see details below my signature, together with those of two other key references) shows that forestry plots reduce breeding density of most waders at least up to 250 m from the plots. The same goes for small and large plots. As small plots have a proportionally longer edge, the effect of forestry can be greatly reduced by planting fewer, larger forests. The draft forest plan fails to consider this key issue. Would include those three refs which complement each other.

We very much hope that Bern Convention secretariat can continue to help conserve the shared African-Eurasian natural heritage of the migratory waterbirds that breed in Iceland, at this critical juncture.

Yours sincerely

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- update 30 August -

Following a query sent to the ministry of the Environment, the prompt answer was:

“The project board for the preparation of a national plan for forestry is reviewing the comments received on the draft. It is expected that the ministry will receive a proposal for a plan, presumably at the end of next month. The Ministry will review the proposal with regard to the mission statement of the project board, provisions in the relevant law and current policy. If this review warrants, the Ministry will request further work from the project boards on certain issues. But then work begins on putting the plan into publication, it will be presented to the Environment and Communications Committee of the Althingi (parliament) and then published by the Minister, cf. law on forests and forestry.”

But we have elections, and then a new government forming so the person answering me from the ministry was not optimistic that this plan would hold, but that is what have to be done.

[Annex: Comments and signatures from Birdlife](#)

Appendix – Unofficial translation of comments made on the draft for a national plan for forestry 2021-2031

Project management of the national plan for forestry Reykjavík, 18 June 2021

Subject: Commentary on the draft for a national plan for forestry 2021-2031

In a letter to the Ministry of the Environment and Natural Resources on 31 January 2020, BirdLife Iceland welcomed the preparation of a national plan for forestry (abbreviation LSK). The society believed that this was an opportunity to reconcile the views of nature conservation and forestry.

BirdLife submitted comments on LSK concerning: (a) the scope of forestry; (b) on the need to reach agreement on the concept of "biological diversity"; (c) any aspects of nature conservation should be considered when selecting land for forestry; (d) the need for consultation; and (e) assessing the environmental impact including the dangers posed by invasive and potentially invasive alien species. Furthermore, encouraged by Fuglavernd/BLIceland to draw up a conservation plan for moorland birds and to assess the conservation value habitats and that the results would be part of the criteria that determine the choice of forestry areas.

The quoted letter from BirdLife Iceland can be found on the company's website:

https://fuglavernd.is/heim/umfuglavernd/alyktanir_umsagnir/

BirdLife Iceland had also answered a questionnaire in writing on 4.11.2020 from the director of LSK.

Furthermore, the BirdLife Iceland submitted counter-questions to LSK about aspects related to environmental issues that were not discussed in the questionnaire.

These counter-questions addressed e.g: (a) how forestry intended to minimize the damage that moorland birds populations will suffer due to increased forestry ?; (b) what would be the position of forestry in drawing up a framework plan for land use ?; (c) has their place of residence who receive subsidies for forestry and where they operate their forestry been researched ?; and (d) are plans and work processes underway to curb the alien species used in forestry should they occur to be aggressive. Quoted answers from the Fuglavernd/BL Iceland and counter-questions to the CEO of LSK can be found on the Fuglavernd's website compare: https://fuglavernd.is/heim/umfuglavernd/alyktanir_umsagnir/

The draft LSK has now been presented as follows: <https://www.skogur.is/is/nyskograekt/landsaaetlun-iskograekt/>

[landsaaetlun-i-skograekt/drog-ad-landsaaetlun-i-skograekt-2021-2025](https://www.skogur.is/is/nyskograekt/landsaaetlun-i-skograekt/drog-ad-landsaaetlun-i-skograekt-2021-2025) .

BirdLife Iceland has studied the draft and unfortunately, we think it fails on aspects of nature conservation and is not the reconciliation base that was hoped for. The estimated extent of forestry is such that it will have a significant negative effect on moorland birds' populations. The species to be used in forestry are mostly exotic and some invasive or potentially invasive like pine (*Pinus contorta*). LSK is a threat to biodiversity in the country. LSK does not accept account of other types of land use such as for nature conservation or agriculture. LSK opposes Iceland's international obligations in the field of nature conservation. It is clear that if the ideas that LSK is considering will be realized the impact on the country's ecosystem will be significant, as will public compensation for the damage of these actions.

BirdLife Iceland strongly supports a minority opinion in the draft for national forestry planning (see LSK's website).

Furthermore, Fuglavernd /BLIcekand will encourage the Minister for the Environment and Natural Resources to ensure that LSK's draft will be withdrawn and that impartial professionals, who do not have a direct interest in increasing forestry will be recruited to carry out aspects of the plan considering nature conservation, land use and planning, biodiversity, use of alien species in forestry and environmental impact assessment forestry. It is clear that the Forestry's task force on those aspects of LSK will not suffice.

On behalf of BirdLife Iceland, your's truly

Ólafur K. Nielsen, Chairman BirdLife Iceland