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The New EU Forest Strategy for 2030—An Analysis of Major Interests

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Abstract: The New European Union Forest Strategy for 2030 has been controversially discussed by all relevant interest groups: member states, forest owners, forest-related industry, environmental NGOs. The analysis reveals two central conflicts characterizing the Strategy: sovereignty vs. increased Union control—the primary concern of member states and forest owners; and commodity vs. amenity—a central issue between forest-based industry and environmental NGOs. In this respect it is interesting to note that, while being competitors over influence in European forest policy, both forest-related industry and environmental NGOs share the demand for clearer definitions in the Strategy. The Commission's position is discussed in view of the central conflicts with no unequivocal results—while in the first conflict the Commission can be assumed to, indeed, seek to obtain more power vis-à-vis the member states, with regard to the second conflict three assumptions are on the horizon: (i) the Commission tries to balance the demands of commodity and amenity- oriented interest groups; (ii) despite environmental rhetoric used, the Strategy is dominated by economic goals; (iii) the strategic vision of the Commission inclines towards environmental goals.

Keywords: forest policy; forest politics; interest groups; forest conflicts

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1. Introduction

The New European Union Forest Strategy for 2030 [1] is a result of a number of factors and processes that have led to a strategy paper described as rather controversial by many. The stumbling blocks to the success of a common European forest policy framework are well-known in international forest policy debates: concerns about sovereignty vs. increased Union control on the one hand and disagreements about the primacy of either economic or ecological goals (commodity vs. amenity (e.g., [2]) on the other. Sovereignty vs. Union control is a conflict that relates to the structure-level of analysis. Here, two core concepts well known to any student of international politics matter most—power and availability, and usage of resources. The latter conflict encompasses the normative level of analysis that is primarily associated with the agent-level of analysis. On this level, frames matter as they determine the dominant doctrine an actor adopts [3] in relation to forests and, consequently, the interest group the actor adheres to. Next to the structure/agency ([4])-based categorization of conflicts there are other possibilities to structure and analyse them, e.g., as follows: "the conflict over nature conservation versus forest production concerns substance. In contrast the subsidiarity/sovereignty and negotiating rule conflicts concern procedure" [5] (p. 92). Another alternative is structuring by actor as is done throughout this work.

The time dimension also plays a central role in the evolution of European forest policy. As described by Pülzl et al. [6], three phases can be observed in European forest policy: emergence (1958–1960s), expansion (1970s to late 1990s) and stabilization (late 1990s to now).

We are arguing that a second phase of expansion can be observed today. There is an ongoing debate about the competencies on forests between the member states and the EU [7].

The different forest policy phases can be differentiated by shifts in scope and emphasis. Beginning with a nonexistent-up-to-marginal EU forest policy with a rhetorical focus on production, it slowly shifted towards a more balanced approach between production and nature conservation and increased EU influence to finally evolve into a rather ecology-favouring New EU Forest strategy that inclines towards considerable EU influence on the national forest policies of member states (MS) [6]. The shift is explained with the help of several theoretical approaches, each stressing different factors—spill-over processes, institutional developments, national interests and political discourses. The spill-over effect implies that integration in one functional area will almost necessarily lead to integration in other areas. According to Ernest Haas, "integration brings loyalties, expectations and political activities towards a new center, whose institutions possess or demand jurisdiction over the pre-existing national states" [8] (p. 139). As argued by the authors, "this shift in discourses over the three developmental phases is also confirmed by legal analysis (referencing to [9]) that shows over time different bases for legal action were employed to support the EU's revised focus and efforts, shifting from agriculture and trade to environment and to biodiversity, climate change and energy" [6] (p. 14).

Although having a considerable impact on policy, the reasons behind the shifts in political and public sentiments are not always straightforward. In Western Europe, the start signal for the rethinking of humankind's relation towards nature is believed to have been given in the 1970s when acid rain fell in Great Britain and environmentalists managed to successfully attract the interest of mass media [10]. However, for a start signal to trigger action there usually needs to be a background process that prepares the action. Indeed, as follows from Christophersen and Weber [11], environmental NGOs have had a considerable influence on European forest-related policy since the 1990s. However, next to the process of active opinion formation there might have been another, more hidden and passive process at work. Or, even more probable, both active and passive processes have worked together to create the shift in the global discourse towards nature. This was accurately observed by Roxanna Sjöstedt, who pointed out that "the relationship between discourse and actors [. . .] can be linked to the discussion of the relationship between structure and agency (referencing to the agent-structure problem by Wendt, 1987 [4])" [12] (p. 237).

Thinking in this line of argument, a shift in the relation of men towards nature can, indeed, be traced throughout human history. More so, it can be related to a certain epoch. In line with that logic, every epoch in the history of society would be characterized by a number of typical features, comprising specific sets of norms and forms of societal organization with their respective modes of production, each echoing the corresponding levels of technological development [13]. Those typical features could be used as markers by means of which one could differentiate and analyse the different episodes in a society's development [14]. This was noticed, among others, by Annette Braun [15], who has followed the change in perception of nature by man throughout the civilisatory progress in Europe. As noticed by Braun, this was not a straight-line process, but rather characterized by the taking turns of rational and emotional sub-epochs. Those sub-epochs were supposed to be caused primarily by the generational change within society. The global turning point in the relation of mankind towards nature of our recent history, which can be dated to the 1970s, indeed corresponds to such a shift from a rational to an emotional epoch identified by Braun. A similar conclusion was drawn by Pülzl et al. [16], who have analysed shifts in global meta- and forest discourses. Correlating their findings with the above argumentation, the observed shift in forest policy preferences indeed corresponds to a shift in global meta-discourse from the "modernity" discourse to the "limits to growth" discourse, while a global forest discourse shift towards nature preservation occurred during the 1980s.

Thus, the forest policy in the EU we have today is the result of a number of events and processes that have accompanied it since the early days of the Union. It is a policy dominated by the conflict between commodity and amenity on the one hand, and matters

of national sovereignty vs. increased Union control on the other. In light of the conflict-laden background accompanying the policy creation, this paper aims to analyse the New European Forest Strategy for 2030 and to highlight the positions the key interested actors have taken with regard to it. Another question of interest to this paper is to identify where the Commission stands in the related conflicts.

2. Material and Methods

In order to achieve the goal of this paper, an extensive document analysis was undertaken. The major document analysed throughout this paper has been the Commission's New European Forest Strategy for 2030. Next to the Strategy, related documents, such as the Biodiversity Strategy, the EU Habitats Directive or instruments such as Horizon Europe were studied in order to get a rich picture of the policies and actions referred to or described in the New EU Forest Strategy. Additionally, Open Letters and Joint Statements formulated by Ministers responsible for forestry, organized Forest Owners organizations and forest-based Industry as well as environmental NGOs were scrutinized in order to get an insight into the conflict around the New EU Forest Strategy. Next to primary sources, secondary sources in the form of research articles, opinion papers and book chapters were purposively sampled and consulted for both analytical insights and related theories that were helpful in elaborating the research problem. These sources were critically assessed by means of a qualitative content analysis that has been the major research method applied throughout this work.

3. Analysing the New EU Forest Strategy for 2030

3.1. The Strategy in a Nutshell

The New EU Forest Strategy for 2030, which has the legal form of the Commission's communication, was released on 6 July 2021 by the European Commission. It seeks to replace the Forest Strategy adopted in 2013 and aims at strengthening forest conservation while encouraging a sustainable forest economy on the territory of the European Union [1]. The layout of the Strategy is structured as follows: an introductory Section 1 with background information, Sections 2 and 3 that deal with the economic and ecological sides of the policy, respectively, Sections 4–7 that cover the instruments and mechanisms related to its implementation and, finally, a concluding section.

Section 2 of the New EU Forest Strategy concentrates on the socio-economic part of forest policy and specifically highlights the following topics: wood- and non-wood-based bioeconomy, wood-based bioenergy and education in sustainable bioeconomy. Among the principles to promote sustainability is the cascade principle known from the "old" EU forest strategy 2014–2020. According to this principle, wood is to be used in the following order of priorities: (1) wood-based products, (2) extending their service life, (3) re-use, (4) recycling, (5) bio-energy and (6) disposal [17]. Next to the cascade principle, reference is made to the principle of circular economy, while a differentiation is made between short- and long-lived wood-based products. Additionally, an emphasis is put on providing professionals from the forestry sector with the skills needed for a transition towards more sustainable forest management practices [1].

Section 3, in turn, deals with forest conservation for two central purposes: to preserve biodiversity and provide critical ecosystem services on the one hand, and to mitigate climate change and increase forest resilience on the other. For those reasons, such goals as the planting of at least 3 billion trees and protecting at least 30% of EU's land area (out of which 10% is to be set under strict legal protection) are set. To achieve those goals, the New Forest Strategy foresees a close interconnection with the EU Biodiversity Strategy for 2030 [18].

As part of the Biodiversity Strategy's implementation, the Commission attempts to propose a legally binding instrument for ecosystem restoration, which will include the goals for restoring forest ecosystem based on the EU Habitats Directive [19]. According to the Commission's proposal, these plans are to be financed from three sources: private

investments, Member State funds and EU funds. Apart from that, the New EU Forest Strategy foresees a close link to the Common Agricultural Policy (CAP) [20] of the EU (as was already the case in the 2013 Strategy), which already provides financial support for forests and forest management through national Rural Development Programs and is expected to continue doing so through the New CAP 2023–27 [21] that offers increased flexibility to design forest-related interventions according to national needs and specificities [1].

Section 4 of the New EU Forest Strategy deals with forest monitoring, reporting and data collection. An instrument for reporting on EU forests has not existed since 2007 when the Forest Focus Regulation (2152/2003) [22] expired. Therefore, the Commission plans to establish a legislative proposal for a Forest Observation, Reporting and Data Collection framework, which will create an EU-wide integrated forest monitoring system. Next to Strategic Plans for Forests, which are to be prepared regularly by the Member States, the Commission plans to increasingly rely on remote sensing data and ground monitoring data obtained in the framework of the Forest Information System for Europe (FISE) and to enhance scientific cooperation on forests through its Joint Research Centre. Apart from that, Horizon Europe (Horizon Europe is the EU's key funding programme for research and innovation with a budget of EUR 9 5.5 billion [23]) is sought to stimulate a strong common research and innovation agenda on EU forests, which is the major subject of Section 5 of the Commission's New EU Forest Strategy [1].

Section 6 of the New EU Forest Strategy covers an EU forest governance framework and suggests merging the Standing Forestry Committee and the Working Group on Forest and Nature into one single expert group with a mandate that would reflect all the environmental, social and economic objectives of the new EU Forest Strategy. With regard to public engagement, the Commission plans to take on a similar approach by creating one group out of two existing ones: the Civil Dialogue Group on Forestry and Cork and the Working Group on Forest and Nature, and revising its mission statement [1].

The final Section 7 of the New EU Forest Strategy deals with implementation and enforcement. The legal basis for the conservation of a certain part of forest habitats as well as of forest-related animal and plant species is provided for by the Habitats Directive [19] and the Birds Directive [24]. The Environmental Liability Directive [25] covers the prevention and remediation of environmental damage, while the Environmental Crime Directive [26] criminalises certain conduct that involves damage to protected forests [1]. As further stated in the New EU Forest Strategy, the "Strategic Impact Assessment Directive [27] and Environmental Impact Assessment Directive [28] are relevant to certain forestry plans, programmes and projects. The Directive on public access to environmental information [29] provides for making available environmental information, including forest management plans" [1] (p. 24). Illegal logging is covered by the EU Timber regulation [30] and the Forest Law Enforcement Governance and Trade Regulation that establishes a licensing scheme of imports of timber into the EU—the so-called "FLEGT" [31].

Thus, the New EU Forest Strategy is an ambitious and widespread policy with a complex layout entailing multiple references to related policies and legal acts. As in its preceding Forest Strategy of 2013 [17], the multifunctionality of forests is acknowledged and accounted for, and yet, a certain imbalance in favour of nature protection over the economic use of forest might be felt while reading the document, especially in relation to the former Strategy. Unlike the 2013 strategy, the New Forest Strategy aims at more Union control over Member State forest policy. This attempt becomes visible despite multiple references to the importance of the national and regional levels as well as the principle of subsidiarity, since they are accompanied by references to legally binding instruments, e.g., the Habitats or the Birds Directive, and mechanisms of centralized control in form of obligatory reporting, centralized monitoring and the introduction of new sustainable forest management indicators, thresholds or ranges. The attempted merging of the existing Standing Forestry Committee and the Working Group on Forest and Nature into one group with a revised mandate further indicates an attempt at a power shift from the Member States towards the Union [1].

The New Forest Strategy is a "flagship initiative of the European Green Deal [32]" [33] and is directly linked to the EU 2030 Biodiversity strategy [18]—both are Commission's communications and, by this, legally non-binding. However, the European Green Deal references the 8th Environmental Action Plan, which is adopted under the ordinary legislative procedure and is, by this, legally binding. Therefore, and considering the layout of the Green Deal, it is "thus clearly a policy tool to be translated into legal measures, but anchored in the duty of sincere cooperation" [34]. Consequently, the same is true for the New European Forest Strategy, even though it is formally a piece of "soft law" referencing to the principle of subsidiarity. Still, its interconnections with legally binding instruments hint towards it being intended as a rather binding policy. Overall, the legal status and the consequential enforceability of the New European Forest Strategy as part of its umbrella policy—the European Green Deal—remain uncertain (adapted from [34]).

The legal ambiguity of the New EU Forest Strategy is accompanied by an ambitious and widespread layout, which at the same time remains largely unspecific in its formulations and is overall slightly "confusing" due to the continuous references to directly or indirectly related policies that sometimes pursue contradicting goals. To give an example, it seeks to contribute to European Climate Law (in reference to Regulation (EU) 2021/1119 [35]) by achieving the EU's greenhouse gas emission reduction target of at least 55% by 2030 and to the Commission's biodiversity ambition, while at the same time striving to secure livelihoods in rural areas and to support a sustainable forest bioeconomy [1]. The problem of incoherence is known to accompany forest policy both on the EU [6,36] and the Member State [37,38] level.

This example reflects the inherent opposition between resource use and conservation in environmental policy that becomes evident in the New EU Forest Strategy. The opposition sought to be overcome by the concept of sustainability, the reference to which is made frequently in the policy text. The instruments by means of which "sustainability" is going to be implemented according to the Commission are—apart from legal obligations—a re-education of foresters in sustainable forest management practices, "sustainable finance" (a concept known from the European Green Deal and defined by the European Commission as "the process of taking environmental, social and governance considerations into account when making investment decisions" [39]) obtained from Member State funds, EU funds and private investors, as well as increased EU control by means of remote sensing data and regular reports to be submitted by Member States. These measures, however, have met considerable resistance from EU governments and organized forest owners and were criticised by forest industry and environmental NGOs, as well as experts. By this, the criticism towards the New EU Forest Strategy for 2030 came from all major interest groups. Such a degree of discontent with regard to a Union policy requires attention and needs to be analysed in more detail.

3.2. Major Actor Positions

3.2.1. Member States

On 2 July 2021, a Joint Letter of Ministers responsible for Forestry of Austria, Czech Republic, Estonia, Finland, Germany, Hungary, Latvia, Poland, Romania and Slovakia on the EU Forest Strategy post-2020 was formulated and addressed to the European Commission [40]. In the letter, the Ministers disapprove of the imbalance of the suggested strategy that favours ecological considerations over economic–social ones; its technocratic, one-size-fits-all and top-down approach that neglects the principles of subsidiarity and proportionality and diminishes the role and competences of Member States in dealing with their forests; and a lack of involvement of the Member States in the elaboration of the strategy, of a discussion at the Standing Forestry Committee and of information transfer from the Commission to the Council [40].

As a consequence, the Ministers urged the Commission to respect their competences on forest-related matters, to adhere to Council conclusions on the matter and to acknowledge the variety of European forests and their different functions. The Ministers strongly

opposed a legislative proposal on EU Forest Planning and Monitoring and argued that "such a tool would bring unprecedented administrative burden to Member States and operators, while the reasoning, purpose and added value remains unknown" [40]. The Ministers further concluded that they "especially reject the Commission's intention to setting EU indicators and thresholds and new forest certification scheme for Sustainable Forest Management and to regulate in detail individual issues and practices for all Member States and forest owners and managers" [40]. Concluding, the Ministers urged the Commission to "take into account the Bratislava Ministerial Declaration 'The Future We Want: The Forests We Need', signed by the EU and supported by both Commissioners, Janusz Wojciechowski and Virginijus Sinkevičius, at the Eighth Forest Europe Ministerial Conference" [40].

The Bratislava Ministerial Declaration was signed under the aegis of Forest Europe—a Pan-European voluntary high-level forest policy process encompassing 46 signatories—45 European countries and the EU. The Declaration emphasizes the multifunctional role of forests, the importance of national policies and international agreements under the leadership of Ministers (e.g., the Helsinki Resolution or the Oslo Ministerial Decision) and increased stakeholder inclusion as well as the relevance of evidence-based expert decisions for both the legitimacy and the effectiveness of sustainable forest management in Europe [41].

3.2.2. Forest Owners

In their opposition towards the New EU Forest Strategy, Ministers stand hand in hand with Forest Owners. This became evident from the Vienna declaration of the European Forest Owners on the New EU Forest Strategy for 2030 held on 4 October 2021 by European forest owners from 16 European countries as well as representatives of 6 EU organisations to voice their concerns over the New European Forest Strategy [42]. Among the key issues was the imbalance between ecological and economic considerations with regard to forest policy, too much centralization in a policy that requires regional and well-established foresting techniques, unnecessary restrictions and hindrances set by extensive bureaucracy, and a neglect of the Member States, EU Parliament and European Forest Owners by the Commission in the formulation of its New Forest Strategy [43]. The participating states came from 15 EU Member States: Austria, Croatia, Czech Republic, Estonia, Finland, France, Germany, Hungary, Latvia, Lithuania, Poland, Romania, Slovenia, Spain, Sweden, as well as from Norway—a member of the European Economic Area. Taken together (excluding Norway), those European Member States account for 84% of the entire forest area of the European Union—1,339,016 km^2 out of 1,592,313.8 km^2 (calculated with data from the World Bank, 2020 [44]).

3.2.3. Forest Industry

Criticism towards the Strategy from the forest-based sector has been summarized in another reaction in form of a Joint Statement. United under the European State Forest Association (EUSTAFOR), forest-based industry organizations published a Joint Statement as a reaction to the draft of the New EU Forest Strategy for 2030 on 23 June 2021. In the Statement, the forest industry urges the Commission to take into account the opinion of the EU forest and forest-based sector, as ignoring it further might result in the disruption of the entire sector of economy. It could also lead to a lack of the Strategy's implementation [45]. The Statement references the multifunctionality of forests as well as the sustainable forest management concept (SFM). Attempts are made at defining "bioeconomy" as to fit the interests represented by the Statement. Timber is identified as the main provider of funding for supporting other functions of the forests; it is therefore concluded that the Strategy must "not limit the economic development of forests and impact jobs in the sector". New certification schemes are seen as problematic and the rationale of developing them is questioned [45].

3.2.4. Environmental NGOs

On the opposite side of the metaphorical "trench" between commodity- and amenity-oriented groups in the European forest policy debate is a broad alliance between over 80 NGOs united under the European Environmental Bureau (EEB) network. In a Joint Letter the NGOs issued on 22 October 2021 as a response to the Ministerial letter and the Vienna declaration concluded by Forest Owners, they urged the Member States to "fully endorse the EU's New Forest Strategy for 2030" [46]. The NGOs further demanded that Member States "stop endorsing status quo forestry practices" and said they believe to see a false dichotomy between the economic, social and ecological roles of the forests being made by the Member States. In their Joint Letter, the NGOs reference to the MS obligations that arise from the Habitats and Birds directives as well as to the commitments made during the Convention on Biological Diversity and in other international fora, while welcoming the Strategy's attempt at increased harmonization in forest observation, reporting and data collection [46].

A point of criticism to the Commission's New EU Forest Strategy is the choice not to define binding indicators and thresholds for SFM [47,48], which the NGOs see as a result of intense lobbying from the Forest industry. Another point of criticism was related to the Strategy only indirectly and referred to the keeping of biomass on the list of green renewable energy sources, which was seen as an additional strain on forests, especially in the face of growing demand for renewable energy sources [48]. Overall, a general opposition of the NGOs towards the forest industry became evident. In a joint publication of June 2021 via the Fern network, the forest industry is assumed to be focused on "short term financial interests" and accused of harming not only the forests, but also small businesses and rural communities [49]. Since lobbying activities by the forest industry are feared, the Commission was urged "to stand strong and ensure the Strategy signals a shift towards nature protection" in the same letter [49].

As follows from the studied documents, summarized in Table 1, the concerns raised by the Ministers in their letter largely match those expressed by European Forest Owners—the New EU Forest Strategy is perceived as too centralized and of a command-and-control type, too imbalanced in favour of ecology over socio-economic considerations and developed with a neglect of MS competences and a lack of stakeholder participation. Arguing against increased Union control over forest policies, both Member States and forest owners meet the Commission at the fault line running through sovereignty and increased Union control. The major issues that this fault line defines are the resulting foci of forest policy, the division of competences in forest policy and the protection of property rights.

Table 1. Fault lines in the New EU Forest Strategy for 2030.

Actor	Major Concerns	Fault Line	Perceived Opponent
Member States	Imbalance; Power shift; Centralization; Overregulation	Sovereignty vs. increased Union control	EU Commission
Forest Owners	Imbalance; Lack of Involvement; Overregulation; Lack of Compensation	Sovereignty vs. increased Union control	EU Commission
Forest Industry	Imbalance; Lack of Involvement	Commodity vs. Amenity	EU Commission; Environmental NGOs
Environmental NGOs	Vague formulations; Lack of binding indicators	Commodity vs. Amenity	Forest Industry

The second major fault line running through the New EU Forest Strategy is that between commodity- and amenity-oriented interest groups, thus, between forest industry and environmental NGOs. While the forest industry complains about a lack of involvement and

a disregard of their interests by the Strategy, NGOs protest against heavy lobbying from the forest industry and fear the misuse of the Strategy for "greenwashed" economic purposes [50]. Interesting to note in the conflict between the forest industry and environmental NGOs is the common demand for clear definitions, which the Strategy is currently lacking.

4. Discussion

Thus, two central fault lines are running through the New EU Forest Strategy for 2030: sovereignty vs. increased Union control and commodity vs. amenity. The case over an imbalance in favour of ecology made by the Member States and Forest Owners seems to, indeed, have some ground. On the one hand, the function of the forests as a carbon sink and as habitats for animal and plant species are extensively covered by the New EU Forest Strategy, while on the other hand the mechanisms of finance and of compensation remain largely vague even though they are mentioned in the Strategy. The concept of bioeconomy might theoretically have the potential to evolve into an instrument able to reconcile the two interest groups. However, due to the overall prioritization of commodity-side interests in its current definition [16,51,52], this seems unlikely for the time being. Another aspect to consider is the need to further investigate how and to what extent forest protection plans can be expected to affect the economies of the Member States.

The other conflict is related to the increased control the Commission strives to achieve over the Member State forest policy by means of obligatory reporting, new indicators and thresholds as well as the usage of remote sensing data for monitoring purposes. Indeed, since information is power, having the power to collect and control this information through a harmonized EU monitoring as intended by the Strategy is a powerful tool the Commission would gain in the power game with the Member States (as follows from interviews cited in: Winkel and Sotirov, 2016 [53]). This approach builds on the forest-related policies previously developed in the Commission Green Paper on forest protection and information in the EU: preparing forests for climate change [54]. The case over a certain redundancy of centralized reporting and the creation of new indicators becomes especially striking in the face of already present national forest strategies and programs with their respective sets of criteria and indicators [55] collected in National Forest Inventories and brought together by the European National Forest Inventory Network [56].

In this context, it is interesting to note that the opposition towards the New Forest Strategy is not evenly distributed among all European Member States. As in Edwards and Kleinschmit [5], a certain generalization towards a "north–south split" can be made "where Southern European nations are generally more in favour of protection while Northern European nations generally favour productive uses" (p. 90). This tendency can be explained by a higher amount of forests in Northern European countries and their consequential higher relevance to the economy in these countries on the one hand and a higher predisposition towards forest fires in Southern European countries combined with a lesser economic relevance of forests on the other hand.

Having summarized the major conflicts dominating current EU forest policy, a very important and intriguing question arises—Where does the Commission stand in these conflicts?

The Role of the European Commission

Before starting with this section, it should be clarified that we treat the Commission as a unified actor throughout this analysis, as the "creator of the Forest Strategy". At the same time, we are, of course, fully aware of the different positions within the Commission's working groups involved in the policy making process, DG AGRI and DG ENV in particular.

As follows from the quote about the Commission to "stand strong" vis-à-vis forest industry lobbying cited above from a Fern publication, the impression might arise that the Commission stands on the environmental NGO side of the metaphorical trench between commodity- and amenity-oriented interest groups. From the first glance at the new EU

Forest Strategy for 2030, the same impression might arise, and yet, after studying it in more detail, some doubts about this viewpoint arise.

Thinking about this question from a historical point of view, no unequivocal answer can be given, since the Commission's position has changed several times. In its early days, the Commission had literally no position on forests, which were solely in the hands of the Member States. At that point, the focus of European politics (European Economic Community at that time) was much narrower, the number of Member States smaller and the environmental discourse was different from the one we experience today. The focus of forest policy clearly inclined towards production. During the 1970s, the discourse towards the environment changed, while at the same time the project "Europe" grew, gained new members and became more powerful. This resulted in an increased number of competences granted to the Commission. At that development phase of European forest policy—referred to as "expansion" by Pülzl et al. [6]—the environment came more into focus, while increased demands for a common forest policy were voiced. These demands, however, were brought forward not so much for environmental reasons, but in order to counterbalance other policy domains, such as agriculture, which came to dominate forest policy in the EU [6].

As of the 1990s, a clear shift in the Commission's preference towards nature protection policies became visible. This shift can be explained by several factors. Among the central ones is the heavy and successful lobbying from environmental NGOs, which became closely intertwined with the Commission, especially with the Directorate General (DG) Environment [11]. Another explanation is offered by theory. Borrowing from historical institutionalism, Pülzl et al. [6] argue that "[. . .] institutions such as the Commission, the ECJ [European Court of Justice] or the EP [European Parliament] are assumed to look for opportunities to increase their power while political decision-makers may face considerable constraints to control this" (p. 5). Onida [57] even questions whether forests fall into national competency because they are subject to environmental objectives (By this, they are subject to the precautionary principle (Art 191, TFEU (Treaty on the Functioning of the European Union))). Indeed, we can speak of mixed competencies, also because of the multitude of EU policy documents that relate to forests directly or indirectly [36].

This observation is confirmed by several authors. In his analysis on international organizations, Clive Archer [58] concluded that "Once life has been breathed into an international organization and once it has started to build up a bureaucracy, a *modus operandi* and a role not totally dependent on the acceptance of its every act by all its membership, then it becomes politically more difficult for a member state effectively to stop that IGO's [intergovernmental organization] activities" (p. 81). While the European Commission is not an intergovernmental organization in the classical sense (the EU as a whole has been described by many as a *supranational* entity), it certainly is an international organization created by European governments with a certain aim. As concluded by Richard Higgott [59], "the EU is the most developed example of a hybrid, multiperspectival, multi-issue international organization to date" (p. 621). Apart from that, the governments are very well represented in the Commission. As observed by Versluis et al. [60], while "the Commission is formally independent from the member states, governments actively try to co-shape EU policies, for example through fellow nationals within the Commission administration, either as an official ("administrator"), or in the form of permanent officials or seconded national experts" (pp. 137–138). In this respect, strategies related to domestic policy uploading to the EU level with a subsequent downloading of the "fitting" policies back to the national state level are of central importance [61,62].

Those officials seconded to the EU, though, are subjected to the process of "Europeanization". Europeanization is a "process of (a) construction, (b) diffusion, and (c) initialization of formal and informal rules, procedures, policy paradigms, styles, 'ways of doing things', and shared beliefs and norms [. . .]" [63] (p. 30). Thus, they are prone to becoming increasingly more "European" and less "national". The more the process progresses, the more "cross-pressures" are felt by those agents of the Member State lead-

ing to the individual becoming even more socialized in his/her role as a "European". Lazarsfeld et al. [64], define cross-pressures as follows: "In our complex society, individuals do not belong to one single group, only. They have a variety of social affiliations: their social class, their ethnic group, their religious group, the informal associations in which they participate. These various affiliations will make conflicting claims on some individuals [. . .] (p. xxi). This process reinforces the independence of the Commission.

At the same time, a background process being the change in the general perception towards environmental norms was running, creating a certain "logic of appropriateness" (See [65]) in the environmental political rhetoric on both sides—the Commission and NGOs as well as the Member States and Forest Owners. However, adapting a certain rhetoric does not necessarily mean adhering to it [52]. Indeed, despite an "appropriate" environmental rhetoric, we often see an actual resistance of the Member States towards actions that are counter-productive to the national interest [5,62]. This supports the prerogative of the prevalence of national interests in international relations.

Whether or not the environmentally oriented rhetoric of the Commission with regard to its forest policy corresponds to its actual goals, in turn, is a puzzle yet to be solved. As argued by Kleinschmit et al. [52], for the most part, "EPI [environmental policy integration] stays mainly on a level of environmental rhetoric. In contrast to promoting a "real EPI", environmental concerns are mainly addressed in rhetorical terms within policy goals (=rhetorical EPI) but not in policy practice" (p. 10). There is evidence supporting that claim. So, the bioeconomy promoted by the New Forest Strategy is a purely commodity-oriented concept, which focuses on primary production, resource efficiency, innovation and competitiveness, while "[n]ature and environment are seen as resources that exist for humans to use and overuse, if necessary" [51] (p. 11).

A further indication of an economic subtext incorporated into the New EU Forest Strategy is provided by studying its umbrella policy—European Green Deal. Apart from extensive environmental rhetoric, the European Green Deal is a policy that furthers economic interests. This observation is supported by the analysis carried out by Sikora [34], arguing: "While reading through the Commission's communication on the EGD no trace of a reference to the classical environmental principles can be found. Only sustainability has gained a particular attention as an underlying concept, but with a particular emphasis for its economic potential" (p. 689). As further observed by Sikora, no reference is made to the principle of environmental integration (Article 11 TFEU), "[. . .] which illustrates a critical dissonance between the EGD as an ambitious policy measure and the legacy and relevance of the EU environmental law for the purpose of its implementation" [34] (p. 689). This observation is supported by the legal uncertainty that has been identified for the New EU Forest Strategy, which has been criticized for being too amenity-oriented.

Another interesting observation with regard to the New EU Forest Strategy is its linkage to the Common Agricultural Policy, e.g., through finance, given that agriculture and forestry traditionally compete over finance/investment and land area [51]. The division of competences with regard to policy matters between the DG for Agriculture and Rural Development and the DG Environment further suggests an attempt at balancing the different interests within the forest policy.

All these observations might be an indication of a clever political maneuver to gain public and NGO support as well as more power vis-à-vis the Member States on the one hand, while not contradicting the Member States' national (economic) interests on the other hand. They might, however, also simply indicate a lack of clarity in the strategic vision of the Commission with regard to the New Forest Strategy. Overall, it can be concluded, though, that despite the heavy criticism towards the New Forest Strategy about it being biased towards the amenity-focused interest group, the Strategy does try to balance the interests of both sides. By this, it also adheres to the overarching goal of sustainable development that puts equal weight on the ecological, societal and economic aspects of life.

Table 2 summarizes the conclusions drawn in this section. As far as the sovereignty vs. increased Union control fault line is concerned, it can indeed be assumed that the

Commission seeks to obtain more power vis-à-vis the Member States. The results with regard to the commodity vs. amenity fault line are not straightforward, but it can be assumed that a genuine attempt at balancing the competing interests has been undertaken by the Commission. Given the difficulty to overcome the trade-offs between environmental preservation and economic benefits and the inherent problem of incoherence in forest policy, this was not an easy task. As a consequence, the produced outcome in form of the New Forest Strategy turned out unsatisfactory to both sides of the conflict. Interesting to note is an observed common point of dissatisfaction for both amenity- and commodity-oriented actors, namely, purely defined concepts, in particular bioeconomy. Given the growing importance of the bioeconomy discourse and its potential to considerably influence forest policies in the future [16,52], this point of criticism certainly deserves attention.

Table 2. Role of the Commission.

Fault Line	(Assumed) Role of Commission
Sovereignty	Seeks more power vis-à-vis member states
Commodity/Amenity	Tries to balance different demands

5. Conclusions

This study sought to analyse the reactions the New European Forest Strategy for 2030 evoked from major interested actors as to shed light on the major conflicts behind the policy and provide possible topics where convergence of interests can be pursued. For this reason, the New European Forest Strategy for 2030 was examined in detail as were its related policies and legal acts. The major interest groups were identified as the Member States, Forest Owners, Forest-based Industry and Environmental NGOs. The European Parliament made two statements, one on the first draft and one on the final version, that both were very critical. The main points were the lack of cooperation in the preparation of the forest strategy, the lack of a balanced approach towards sustainable forest management in the understanding that the FOREST EUROPE process has created, and the principle questioning of the subsidiarity principle in forestry issues.

Compared to the EU Forest Strategy for 2013, the New Strategy for 2030 was found to aim at increased Union control over Member State forest policy through the introduction of new indicators and thresholds for sustainable forest management as well as the attempted merging of the existing Standing Forestry Committee and the Working Group on Forest and Nature into one group with a revised mandate. Next to that, an ambiguity with regard to the legal status and resulting enforceability of the New Forest Strategy was identified. Being anchored in the principle of subsidiarity, the Strategy references to a considerable number of legally binding EU directives, most notably the Habitats and Birds directives, which already exert a direct influence on MS forest policy.

Against this background, the study revealed that the major conflicts to be found in the New EU Forest Strategy for 2030 are built around the issues of sovereignty vs. increased Union control and the role of forests as either a resource (commodity) or as a valuable object in itself through the provision of non-monetary functions (amenity). Matters of sovereignty were central in the arguments brought forward by Member States and Forest Owners, while the balancing of economic and ecological interests was an important aspect to all interest groups. In this respect it is interesting to note that while being competitors over influence in European forest policy, both Forest Industry and Environmental NGOs share the demand for clear definitions.

The position the Commission takes in these conflicts was found to be equivocal. While it can, indeed, be assumed that the Commission seeks to obtain more power vis-à-vis the Member States, it seems to attempt to balance the demands of both commodity- and amenity-oriented interest groups. The broad and multifaceted layout of the Strategy as well as the seemingly equal level of dissatisfaction with it by both environmental and economic interest groups might serve as indicators for this attempt. Taking into account the difficulty

to overcome the trade-offs between environmental preservation and economic benefits and the inherent problem of incoherence in forest policy, this interpretation seems to fit. However, other interpretations are possible. Among them is the prevalence of economic interests to be promoted by the Strategy, while adopting an "environmentally friendly" rhetoric or a lack of a clear strategic vision with regard to EU forest policy. Which of these hypotheses is closer to reality is a highly interesting and timely topic that requires further research. In this regard, the dynamics within the Commission, especially between DG AGRI and DG ENV, as well the role of the European Parliament, need to be studied in detail.

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