# Comments of the Czech Republic on the Strategic Action Plan for the Implementation of the Protocol on Sustainable Forests Management

# I. Ministry of Agriculture and Forest Management Institute

#### **General remarks**

It is necessary to add basic terms and definition for the purpose of Action plan:

- a. sustainable management and protection of the Carpathians forests,
- b. natural and semi natural grasslands it is necessary to define using habitats of Natura 2000 system
- c. close to nature forestry
- d. native species
- e. sustainable harvesting
- f. Non-wood forest products
- g. all types of identified natural forests from the Carpathian region
- h. Valuable genetic resources

The text generally is more "New protocol" than Action plan, formulations are quite general and vague, any activity is not specified trough detail steps.

# Remarks on specific objectives

### **Objective 2**

✓ Action 2.3. Action plan should specify these activities.

# **Objective 3**

#### Action 3.1.

✓ In this point "sustainable management", could be specifies with Forest management plans and their Framework management rules

# Results expected:

- b) we propose to delete "creating guidelines"
- c) we propose to delete "....and to priority connecting corridors in border areas adopted"

# **Objective 4**

# Action 4.2.

Terms "natural and seminatural grasslands" are unclear, we propose to define these biotopes using habitats of Natura 2000 system

#### Results expected:

a) It is necessary to add key of selection of those areas

# **Objective 5**

# Action 5.2.

✓ We propose to delete the whole paragraph, the fragmentation could be positive to
forests.

#### Action 5.4

Results expected:

a) The plan should specify the following products

#### Action 5.5.

The whole paragraph is redundant. In no European country does not solved this principle...

# **Objective 8**

#### Action 8.1

Results expected:

- a) ......Forest management plans are known in central European countries just 200 years. The methodology is known
- b) Action plan should specify species, which are "rare native forest species"

# II. Ministry of the Environment and Nature and Landscape Protection Authority

In general it seems that goals are taken for actions and in the expected results are also included actions and objectives. The action plan does not suggest any concrete timeline.

#### Remarks on specific objectives

#### **Objective 4**

# Action 4.1.

"...and semi natural grasslands"...Since not only grasslands are concerned, we suggest to use "natural and semi natural habitats and endangered species"

#### Action 4.2.

"Silvicultural measures taken" It should be further specified what kind of measures is meant.

# **Objective 6**

#### Action 6.1.

- ..."virgin forests through establishing **national / transboundary** Protected Areas in sufficient size and number and/or other specific measures of protection."
- "c) Virgin forests protected through establishing **national / transboundary** Protected Areas and/or other specific measures of protection;"

#### Objective 8 a

This objective is in a strong contradiction with the Objectives 4, 6 and 7 of this SAP and with the conservation objectives in the Carpathians in general. Dense forest roads allow hunters to get comfortably into distant areas and to disturb or poach big carnivores and other protected species. In addition to that specification of the scope/parameters of "mountain forests" is missing. The Objective 8 a as it stands seems rather to support large scale industrial logging in untouched areas then local small scale forestry businesses. In general, it seems to be in contradiction with the sustainable forest management approach.