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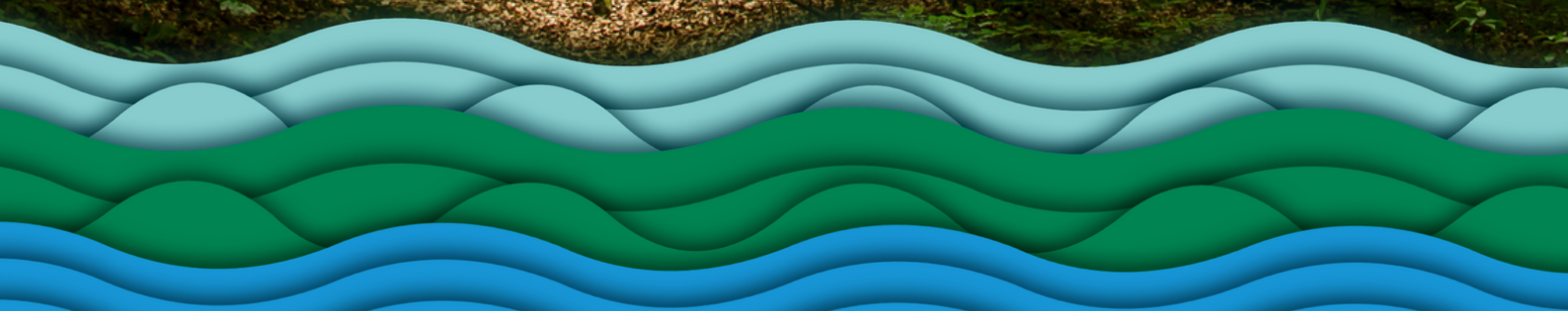


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# UKRAINE'S PROSPECTS OF THE EUROPEAN GREEN DEAL OBJECTIVES IMPLEMENTATION IN FOREST MANAGEMENT

Policy paper





# **Ukraine's prospects of the European Green Deal objectives implementation in forest management**

*Policy paper*

*Authored by – Bohdan Kuchenko, environmentalist of the ICO “Environment – People-Law”*

## **Executive summary**

Currently forest management in Ukraine is characterized by a number of systemic problems making it extremely inefficient and leading to the degradation of our forests. In fact, the State Forest Resources Agency of Ukraine concentrates excessive and contradictory powers, which contribute exclusively to the economic direction of both regulatory and supervisory activities, without due regard for the environmental and social functions of forests. Contradictory and imperfect felling rules lead to the gradual destruction of environmentally valuable forests due to felling and turning them into poor monocultures. At the same time, unaccounted forests are being destroyed rapidly, and forestry enterprises are planning to afforest valuable steppe areas, in particular, with invasive species.

Instead, the European Commission has already approved the EU's New Forest Strategy until 2030, which provides a number of comprehensive tasks to achieve 6 major goals. Among them are support of the socio-economic functions of forests for prosperous rural areas, protection, restoration and expansion of the EU forests to combat climate change and prevent biodiversity loss, strategic monitoring, in-depth research and innovations and inclusive governance frameworks. All this is complemented by the improvement of current EU legislation in the forest sector.

If Ukraine aspires to join the European Green Deal in the field of forest management, it should immediately start implementing a set of regulatory, institutional and budgetary changes set out in the final section of this analytical document.

## **Objective**

Bringing Ukraine's forest management in line with the European Green Deal standards and goals and ensuring biodiversity conservation and sustainable use of forest socio-economic services during the implementation of Ukraine's new forest policy.

## **Research Methodology**

- 1) identification of existing problems in forest management of Ukraine, their analysis and identification of priority issues;
- 2) analysis of experience of EU countries in the implementation of past forest management goals and comparison of Ukraine's current goals with similar goals declared by the EU;
- 3) forecasting the situation with the management of Ukrainian forests in case of failure to address the most pressing issues;
- 4) synthesis of recommendations for a comprehensive solution to the identified problems.

## **Major issues in forest management of Ukraine**

### 78powers in the State Forest Resources Agency of Ukraine (SFRAU).

Since the moment it was established SFRAU has combined<sup>1</sup> the functions of forest policy implementation, economic activities (forest cutting and afforestation and timber sales), as well as control and monitoring of forestry activities.

This state of affairs leads to a number of more significant problems among which the most pressing ones are the following:

1) inefficient environmental control over the activities of state forestry enterprises due to its duplication between the state forest protection, which consists of representatives of SFRAU and direct forest users (forestry enterprises), and the State Environmental Inspectorate of Ukraine<sup>2</sup>, with latter having some limitations regarding response speed. At the same time, the state forest protection records as illegal only unauthorized cutting (i.e., carried out without any permits) and does not react in any way to violations committed by forestry enterprises themselves: cutting without approved forest management materials, sanitary felling in the “quiet season”, sanitary felling of healthy forests, continuous felling without environmental impact assessment procedure, etc<sup>3</sup>.

2) neglect of the environmental importance of forests in the SFRAU decision-making process, as its regulatory activities are aimed primarily at meeting the economic needs of the state and individual forest users.

### 2. Contradictory normative documents regulating cutting.

Cutting in the Ukrainian forests is directly regulated by 5 different resolutions of the Cabinet of Ministers of Ukraine<sup>4</sup>, which is manifested in different rules of cutting. For example, skidding logs along watercourses is formally prohibited only during final cutting in the mountain forests of the Carpathian Mountains. Although the impact of skidding on river ecosystems in no way depends on the type of cutting during which this timber was obtained.

At the same time, none of the afore mentioned regulations establishes certain cutting rules within the territories and sites of the nature reserve fund. Consequently, cutting in the NRF territories and sites is designed and carried out according to the same principles as in operational forests, only subject to the restrictions established by the law. Thus, economic interests of forest users are higher than environmental feasibility, even when cutting is planned within the NRF boundaries.

### 3. Delays in adoption of important documents due to forest industry resistance and “anti-environmental” lobby.

Thus, draft laws “On State Environmental Control” 3091 and 5650 (on forest conservation) faced serious opposition before the second reading and therefore may lose the important provisions. The project of the State Forest Management Strategy of Ukraine till 2035 has still not been approved by the Government, though it has been 8 months since the public discussions of the report on SEA

### 4. Absence of state policy on forest management reforms aimed at nature-close forestry.

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<sup>1</sup> Paragraphs 4-5 of the Regulation on the State Forest Resources Agency of Ukraine  
<https://zakon.rada.gov.ua/laws/show/521-2014-%D0%BF#Text>

<sup>2</sup> Regulation on the State Environmental Inspectorate of Ukraine <https://zakon.rada.gov.ua/laws/show/275-2017-%D0%BF#Text>

<sup>3</sup> How the reform of environmental control contribute to the decrease in illegal cutting  
<http://epl.org.ua/announces/yak-reforma-ekologichnogo-kontrolyu-spryyatyme-skorochennyu-nezakonnyh-rubok/>

<sup>4</sup> It goes about Final Cutting Regulations, Final Cutting Regulations in the mountainous forests of the Carpathians, Sanitary Rules in the Ukrainian Forests, Rules on improving the Quality Composition of Forests, as well as the Order of the Special Use of Forest Resources, approved by separate resolutions of the Cabinet of Ministers.

Ukraine's forestry is still guided by outdated approaches, with valuable natural forests often being cut down in clear-cutting, replaced by monocultures, while the interests of biodiversity conservation and forest ecosystem services remain secondary.

Despite their much greater negative impact on the environment, clear-cutting is still the basic method of commercial timber harvesting compared to selective and gradual felling. Thus, during 2016-2020, from 81.5% to 91% of all final cutting were clear-cutting. At the same time, after cutting foresters create mostly monocultural plantations, often in places where previously there were natural mixed forests.

Due to the prevalence of this approach to forestry activities, forest biodiversity is being depleted and the ability of forests to provide ecosystem services is declining. Apart from this, monoculture coniferous plantations are very vulnerable to fires that can rapidly spread in such forests

#### 5. Cutting of environmentally valuable forests and lack of progress in creating forest nature conservation areas.

In a number of cases foresters refuse to approve creation and expansion of national nature parks in valuable natural forests, and carry out intensive cutting in these areas, which leads to degradation and loss of ecological value of such forests. For example, for many years it has not been possible to obtain approval of regular forest users for the creation of NNP "Chornolisky", "Iziumska Luka", "Dniprovsko-Tetetrivsky", as well as for the expansion of Dzharylgach and Dermansko-Ostrohsky national parks.

#### 6. Destruction of unaccounted forests and possibility of steppe ecosystems afforestation within the frameworks of Ukraine's forest cover extension.

There are hundreds of thousands of hectares of forests in Ukraine that do not have such a legal status and are considered mainly as agricultural lands<sup>5</sup>, and therefore are being destroyed in catastrophic proportions. At the same time, both self-seeding forests that have grown in 20-30 years in abandoned fields and 40-60-year-old forest crops growing on lands for which forestry documents have not been issued in time are disappearing<sup>6</sup>.

Alongside with that, the President's programme "Green Country" plans to plant 1 billion new trees for 3 years, and for 10 years the forest cover should grow by 1 million hectares<sup>7</sup>. At the same time, the indicators of regional norms of optimal forest cover of the territory, approved by the Order of the Ministry of Environment, allow to significantly increase the indicators of steppe regions afforestation. In this situation there is a significant risk of mass creation of new forests in place of steppe ecosystems.

This will not only destroy the latter, but also prevent creation of sustainable forests. After all, plantations in arid conditions will be extremely favourable for the spread of fires. Of all the steppe regions, only in Kherson region the recommendations of scientists were taken into account and all valuable steppe ecosystems remained without afforestation<sup>8</sup>.

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<sup>5</sup> Unaccounted Forests of Ukraine. Policy Brief <http://epl.org.ua/eco-analytics/neoblikovani-lisy-ukrayiny-analitychna-zapyska/>

<sup>6</sup> Due to inactivity of the authorities hundreds of hectares of forests are destructed in Zhytomyr region. EPL: <http://epl.org.ua/announces/chez-bezdiyalist-organiv-vlady-na-zhytomyrshhyni-znyshhuyutsya-sotni-gektariv-lisiv/>

<sup>7</sup> "Green Country": how the forest cover will change within the frameworks of the President's programme implementation. State Forest Resources Agency of Ukraine <https://forest.gov.ua/news/zelena-krayina-yak-zminitsya-ploshcha-lisiv-v-ramkah-realizaciyi-programi-prezidenta>

<sup>8</sup> Valuable Kherson steppes are preserved from afforestation! – Ukrainian Nature Conservation Group <https://uncg.org.ua/zalishennia/>

## 7. No combatting invasive species expansion in forestry.

A number of forestry enterprises continue using invasive species for reforestation and afforestation. Thus, Berezhany forest enterprise in Ternopil region is planning to plant 210 hectares of new forests, using, in particular, red oak<sup>9</sup>. There is still no officially established list of invasive species, bans on their use in forestry and requirements for their control.

## **EU experience in implementation of forest policy goals and major goals of EGD in forest management**

In July 2021 the European Commission approved the EU's 2030 New Forest Strategy<sup>10</sup> that establishes for the EU 6 priority strategic goals (directions) in forest management. Each of these 6 major goals establishes a range of lower level goals – strategic tasks – necessary for their implementation.

### 1. Supporting the socio-economic functions of forests for thriving rural areas and boosting forest-based bio-economy within sustainability boundaries.

Recognizing crucial economic and social significance of forests, in particular 2,1 million of jobs in traditional forest sector of the EU, generating a gross value added of EUR 109,86 bln, and harvesting from forests within the EU boundaries non-wood products at estimated value of 19,5 bln EUR per year, New Forest Strategy of the EU sets out the following tasks:

- Wood of high ecological value should not be used, and the wood-based bioeconomy should remain within the boundaries of sustainability and be compatible with the EU's 2030 and 2050 climate targets and biodiversity objectives;
- the upcoming EU carbon farming initiative and carbon removal certificates framework should include dedicated actions for the production and the use of long-lived wood products, in the full respect of biodiversity objectives;
- the supply of wood products should be done in synergy with improving the conservation status of European and global forests, and preserving and restoring biodiversity for forest resilience, climate adaptation and forest multifunctionality;
- strengthening sustainability criteria for bioenergy, including enlargement of areas, where it is prohibited to source raw materials (for instance, from primary forests) and there are limitations in highly biodiverse forests to ensure no interference with nature protection purposes;
- to mitigate the potential climate and environmental risks, the use of whole trees for energy production, whether from the EU or imported, should be minimised, and to reinforce implementation of the cascading principle, which prioritizes usage of wood for manufacturing wood products and extending the term of their sell-by date, re-usage and processing of wood, and only after this — bioenergy and disposal of wood products.
- EU member-states should design their support schemes for the use of biomass for energy in a way that minimises harmful impacts on biodiversity;

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<sup>9</sup> <http://eia.menr.gov.ua/uk/case/id-8060>

<sup>10</sup> New EU Forest Strategy for 2030. Brussels, 16.7.2021 COM(2021) 572 final <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52021DC0572>

- European Commission will promote collaboration between the tourism sector, forest-owners and nature protection services for eco-tourism activities in the EU, and the elaboration of coordinated and integrated regional, national and subnational programmes on the sustainable production of non-wood forest products.
2. Protecting, restoring and enlarging EU's forests to combat climate change, reverse biodiversity loss and ensure resilient and multifunctional forest ecosystems.

Nowadays forests and other wooded land cover over 43,52% of the EU's territory. At the same time, seriously fragmented patches of primary and other old growth forests now cover only 3% from all forested land of the EU. Yet they belong to the richest EU's forest ecosystems, retain significant amount of carbon and play an important role in providing other vital ecosystem services.

In this area the Commission set the following goals for the EU:

- protect at least 30% of the EU land area forest ecosystems under effective management regime and to put 10% of the EU land under strict legal protection;
- EU member-states should map the primary and old-growth forests within their boundaries, and ensure deterioration of these forests before strict protection regime is applied;
- within implementation of the EU 2030 Biodiversity Strategy the Commission has to provide a legally binding instrument for ecosystem restoration, including forest ecosystems;
- develop guidelines on biodiversity friendly afforestation and reforestation;
- EuroCommission should complete development of regulatory frameworks on carbon removal certification, and also provide advice and technical guidance on the development of ecosystem service payment scheme;
- EU countries should develop national payment schemes for ecosystem services for forest owners and managers to cover their expenses and lost income;
- provide guidance and promote knowledge exchanges on good practices on climate adaptation and resilience;
- increase usage of rural areas development funds for Forest Strategy objectives.

### 3. Strategic forest monitoring, reporting and data collections

Today the information concerning the status of forests in the EU, their social and economic value, as well as the pressures they face and ecosystem services they provide, is patchy. The EU still obtains data on forest biodiversity only within the boundaries of nature conservation territories. On the other hand, the EU has several scattered monitoring and reporting mechanisms, but no strategic framework, which would bring these together.

The following EU goals till 2030 have been set out:

- enhance the existing monitoring of climate impact and other natural or man-made violations on forests, within the framework of the Forest Information System for Europe (FISE) and on the basis of the improved Copernicus products<sup>11</sup>, other data of remote sensing and ground monitoring. FISE will become the cornerstone for forest data coordination in Europe;
- prepare and publish regular reports and lay summaries on the forests in the EU with the support of a broader European forest science partnership;
- develop a European forest science partnership, with a view to support the development of new indicators based on remote sensing and the latest research results;

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<sup>11</sup> Copernicus (previously — GMES, Global Monitoring for Environment and Security) is the European Union Programme on global Earth monitoring to improve the quality of life of European citizens, and not only. <https://www.copernicus.eu/en>

- in full respect of the subsidiarity principle<sup>12</sup>, the EU countries should prepare their Strategic Plans for Forests and the Forest-Based Sector for the nearest 10, 30 and 50 years;
- part of forest areas, included in forest management plans, should cover all the forests under public management and more and more private forests.

#### 4. A strong research and innovation agenda to improve our knowledge on forests

According to the EU 2030 New Forest Strategy, the goal sets out the following tasks:

- in cooperation with the Member-states and stakeholders the Commission should develop a “Planning our Future Forests” research and innovation agenda by jointly identifying research gaps and future priorities for forestry and the forest-based sector;
- support the evidence-based design and implementation of forest restoration strategies with engagement of the society and in different ecological and socio-economic settings, including through the planned research and innovation mission on soil health for forest soils;
- through the Horizon Europe Civil Security for Society Programme implement complementary actions in support of Disaster Risk Reduction policies (including forest fires) to enhance capacities in risk management;
- develop a Citizens’ science Programme for forest biodiversity, notably engaging citizens and civil society in monitoring forest biodiversity.

#### 5. Inclusive and coherent EU forest governance framework.

The wider contribution of forests to the European Green Deal objectives on climate, biodiversity and sustainable bioeconomy necessitates a more inclusive and better coordinated EU forest governance structure. In this area the following tasks have been set out for the EU:

- transparency of the governance should be guaranteed so that everyone can follow how the Commission and the Member States deliver on the objectives of the new EU Forest Strategy;
- propose and implement EU forest governance system that promotes policy coherence and synergies between the different functions a sustainable and climate neutral European economy requires forests to deliver, and allow for an inclusive space for Member States, forest owners and managers, industry, academia and civil society to discuss forest policy matters;
- building on the extensive experience of the Civil Dialogue Group on Forestry and Cork and Working Group on Forest and Nature, create a single expert group to ensure synergy of the activities of civil society, forest owners and forest managers, industry and academia to extend membership and focus on implementation of the new EU Forest Strategy.

#### 6. Stepping up implementation and enforcement of existing EU acquis on forests.

Currently the EU already has powerful environmental legislation regulating, in particular, relations in the field of forest use and forest management. Thus, the Habitats and Birds Directives of the EU provide for the conservation of a good range of forest habitats and of forests-related animal and plant species, Environmental Liability Directive requires the prevention and remediation of environmental damage involving forest habitats, while the Environmental Crime Directive criminalises certain conduct that involves damage to protected forests. The EU Timber Regulation (EUTR) bans the entrance of illegal timber in the EU and lays down obligations of operators who place timber and timber products on the EU market. The fight against environmental crimes is a

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<sup>12</sup> One of the general principles of the EU legislation, stating that decisions should be taken at the level as close to the citizens as possible, wherever it may be the case <https://eur-lex.europa.eu/summary/glossary/subsidiarity.html>



priority in Europol's latest Serious and Organised Crime Threat Assessment (SOCTA) report (2021) and the new EU Strategy to tackle organised crime for the years 2021-2025<sup>13</sup>.

In this area the EU has the following tasks:

- reviewing and updating the aforementioned Directives;
- checking the Timber Regulation and Forest Law Enforcement, Governance and Trade Regulation (FLEGT) and update the rules against cutting and forest degradation till 2021;
- analysing if it is appropriate to set minimum standards for third party certification schemes to ensure adequate standards of reliability, transparency and independent audit;
- supporting civil society's role as a compliance watchdog and engage with Member States to improve access to justice in national courts in environmental matters for individuals and NGOs.
- revising the Aarhus Regulation will strengthen civil society's role with regard to EU decision-making.

As of December 2021 the final draft of the [EU Regulation](#) has been prepared aimed at prevention presence at the EU market not only of the illegal timber, but also of timber which is produced through deforestation and degradation of forests in any corner of the world. Apart from this, under restriction is the import of other products related to deforestation, for example, soy, palm oil, beef, coffee and cacao.

### **The price of not resolving the problem in the field of Ukrainian forest management**

Lack of real actions to solve problems in the field of forest management in Ukraine in the coming years will lead to further rapid degradation of forest ecosystems under conditions of increasing man-made pressure and climate change (more frequent and severe droughts, fires, pests expansion).

Natural forests that do not have protection status will be gradually transformed into monoculture plantations. Invasive species will spread rapidly due to their use in reforestation and afforestation, and this will lead to the depletion of natural forest ecosystems. Self-seeding forests and unaccounted forest crops will be destroyed, which will reduce the real forest cover of Ukraine. At the same time, due to implementation of the afforestation programs in Ukraine valuable steppe areas will be destroyed in Ukraine as the new climate non-resistant forests will be created in these territories. Moreover, the forests will continue suffering from illegal cutting by regular forest users, for which the latter will not bear real legal responsibility.

The combination of all these negative processes in the near future threatens to significantly worsen the state of Ukraine's forest resources, lead to the loss of the state forest sector and deprive Ukrainians of access to a number of important ecosystem services provided by forests.

Against the background of such prospects, it is quite logical that the lack of progress in resolving the above-mentioned systemic problems in fact makes it impossible for Ukraine to join the goals of the European Green Deal in the field of forest management.

Therefore, it is extremely important to implement the following recommendations in order to achieve balanced forest management and join the key goals of the EGD.

### **Suggested recommendations to solve the key issues**

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<sup>13</sup> Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the EU Strategy to tackle Organised Crime 2021-2025, COM(2021) 170 final.



## **1. Regulatory changes:**

### **To the Verkhovna Rada of Ukraine**

1) to adopt the draft law “On State Environmental Control” (№ 3091) keeping in place all major provisions, namely, establishment of a new agency for environmental control and preventing duplication of functions regarding forestry control;

2) to adopt the draft law “On Amending Certain Regulations on Forest Preservation” (№5650)<sup>14</sup> that provides inclusion of self-forested areas to the forest fund and possibility to do forest activities at the discretion of land owner, purchase of private lands by the state for afforestation and forest reserves, and ban on afforestation of the steppe ecosystems and invasion of foreign species in natural ecosystems;

3) to pass the bill “On the Territories of Emerald Network” (№4461) that will provide for legal recognition of the Emerald Network in Ukraine and development of these territories management plans and introduce the environmental impact assessment in the areas of Emerald Network.

4) to pass the bill on updating the environmental impact assessment procedure (№5766) envisaging the list of grounds for providing the EIA report on the inadmissibility of the planned activity, for refusal in issuing the EIA report, and setting the procedure for the preliminary analysis of the EIA report by the authorized agency;

5) to develop and pass the bill on strengthening responsibility of forest users for violation of nature protection legislation in the process of forestry activity, in particular (and especially) during cutting;

6) to develop and adopt the draft law on the state environment monitoring system presupposing widespread application of Earth remote sensing and other modern methods of monitoring;

7) in synergy with scientists and the environmental community to develop and adopt a draft law that will provide for a simplified system of allocating the degraded arable land for the restoration of natural ecosystems, including forest ones - where they were natural. The draft law should include a legally binding tool for ecosystem restoration, covering in particular those ecosystems that have the greatest potential for carbon capture and storage, as well as for preventing and reducing the impact of natural disasters.

### **To the Cabinet of Ministers of Ukraine**

1) to approve the State Forest Management Strategy of Ukraine till 2035 in the edition coordinated with the general public, which is the edition that mainly meets the objectives of the EU 2030 Forest Strategy;

2) to approve the Regulation “On Approving the Procedure for Creation of Protection Areas to Preserve Biodiversity in Forests and the Procedure for Creation of Protection Areas to Preserve the Species of the Red Book of Ukraine” considering the comments of the general public<sup>15</sup>;

3) to develop and approve the methodology of ecosystem services evaluation, namely for forest ecosystems;

4) to develop in cooperation with a wide range of stakeholders, namely academia (majoring in forestry and biology) and environmental community, and approve the normative document regulating forestry activities, namely all types of cutting, in the forests of Ukraine of all forms of ownership;

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<sup>14</sup> [http://w1.c1.rada.gov.ua/pls/zweb2/webproc4\\_2?id=&pf3516=5650&skl=10](http://w1.c1.rada.gov.ua/pls/zweb2/webproc4_2?id=&pf3516=5650&skl=10)

<sup>15</sup> <https://mepr.gov.ua/news/38242.html>

5) to ban usage of round wood from natural forests as timber for industrial bioenergy to mitigate environmental and climate risks;

6) to develop regulatory framework for certification of carbon removal by natural ecosystems, forests including.

### **to the Ministry of the Environment**

1) to adopt the order “On Approving the Order of Forest Management” providing for the integration of the basic forest management with EIA procedure related to final and gradual cutting and afforestation;

2) in cooperation with academia and general public to develop and approve by the Order of the Ministry of the Environment the comprehensive research program in forest industry to identify future industry priorities considering environmental, economic and social functions of forests.

### **2. Institutional changes:**

1) to set up a separate state enterprise responsible for managing state-owned forests via separate subsidiary enterprises (current state forestry enterprises) independently from the State Forest Agency;

2) to set up the State Nature Protection Service of Ukraine that will provide centralized coordination of the nature and reserve fund institutions and will be responsible for protection and management of other NRF sites and Emerald Network territories. It will also develop management plans for forest (and other) sites of Emerald Network;

3) in cooperation with the general public to develop and adopt the National Plan for Implementation of the State Forest Management Strategy of Ukraine till 2035, which, in particular, will provide for the activities on enforcement in the Ukrainian forests of the nature-close forestry;

4) to establish the National Landscape Fire Protection Service responsible for prevention and liquidation of forest fires;

5) to ensure at the level of the Ministry of the Environment, State GeoCadastre, State Forest Resources Agency and regional state administrations activities on steppe areas identification and their afforestation prevention;

6) to grant the Ministry of the Environment and departments for environment at the state regional administrations wide authority regarding comprehensive environment monitoring, and provide more human resources for the relevant bodies to ensure high-quality performance in the field of environment monitoring;

7) to grant the State Forest Resources Agency powers and responsibility on:

- coordinating the process of identification, approval and creation of the old-growth forest nature monuments;
- collection and publishing information of estimated value of non-wood products and services provided annually by the forests of Ukraine;
- coordinating implementation of actions for “cascading” use of the used timber;
- stimulating development of tourism in the Ukrainian forests and promoting cooperation of forest users with tourism sector;

8) to ensure good performance of state regional administrations with respect of creation protection areas to preserve biodiversity in forests and sites of the Red Book of Ukraine;

9) to ensure responsibility of State Forest Resources Agency of Ukraine and Ukrainian Research Institute of Forestry and Forest Melioration for implementation of the comprehensive research program in forestry;

10) to ensure cooperation of regular forest users, scientific institutions and organizations, as well as general public on joint collection and record in forest management materials data on forest biodiversity, namely location of the protected species, habitats and groupings;

11) to establish standing task force at the Ministry of the Environment engaging regular forest users, forest owners, business community related to forest resources, academia and general public to follow implementation of the State Forest Management Strategy of Ukraine and, if necessary, its periodic review.

### **3. Budget changes:**

1) as of 2023 annually envisage funds in the state budget for the purchase of privately owned self-afforested land plots to transfer them in the permanent use to the state forestry enterprises for forestry, as well as the purchase of privately owned ecologically valuable natural areas for the creation of territories and sites of NRF;

2) as of 2023 to ensure adequate annual funding from the state budget of Ukraine for the activities of the newly established central body of the state environmental control;

3) to ensure adequate funding of the implementation of the National Action Plan for the implementation of the State Forest Management Strategy of Ukraine till 2035;

4) to ensure the attraction of sufficient funds from the general and special funds of the state budget for the quality basic forest management in state forestries;

5) to attract funds from the European Union to compensate for the losses incurred by landowners and land users caused by the restrictions in accordance with the management plans of the Emerald Network territories;

6) provide a mechanism for monetization of the ecosystem services for owners and regular users of particularly valuable forests;

7) to ensure allocation of a fixed part of the state forestries' profits for the implementation of the forest research program in Ukraine.

## **Conclusions**

Despite the constant urgency and public attention, Ukraine has not yet been able to solve key systemic problems in the field of forest management - from the concentration of excessive powers in the State Forest Agency and ineffective control over activities of forest enterprises, to the lack of environmental and social functions of forests and current challenges, such as climate change, biodiversity loss and forest degradation during decision-making process and forest management planning. Consequently, Ukraine's forestry and forest management system remains inefficient and outdated.

Given Ukraine's intentions to join the European Green Deal, which integral part is to ensure the sustainable and balanced use of forest resources and avoid forest degradation and deforestation, our country is faced with a crucial task of the urgent reform in the forest sector.

Addressing key issues in this area requires, first of all, political capacity to implement the already developed recommendations among the parliamentary majority, as well as among the leadership of key central executive bodies responsible for formulating and implementing forest management policy. It is also necessary to ensure willingness to develop, in cooperation with all the stakeholders, approve and implement new regulations, which are needed in respect with EGD objectives.



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Instead, the European Commission has already approved the EU's New Forest Strategy until 2030, which provides a number of comprehensive tasks to achieve 6 major goals. Among them are support of the socio-economic functions of forests for prosperous rural areas, protection, restoration and expansion of the EU forests to combat climate change and prevent biodiversity loss, strategic monitoring, in-depth research and innovations and inclusive governance frameworks. All this is complemented by the improvement of current EU legislation in the forest sector.

If Ukraine aspires to join the European Green Deal in the field of forest management, it should immediately start implementing a set of regulatory, institutional and budgetary changes set out in the final section of this analytical document.

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## **Major issues in forest management of Ukraine**

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Since the moment it was established SFRAU has combined<sup>1</sup> the functions of forest policy implementation, economic activities (forest cutting and afforestation and timber sales), as well as control and monitoring of forestry activities.

This state of affairs leads to a number of more significant problems among which the most pressing ones are the following:

1) inefficient environmental control over the activities of state forestry enterprises due to its duplication between the state forest protection, which consists of representatives of SFRAU and direct forest users (forestry enterprises), and the State Environmental Inspectorate of Ukraine<sup>2</sup>, with latter having some limitations regarding response speed. At the same time, the state forest protection records as illegal only unauthorized cutting (i.e., carried out without any permits) and does not react in any way to violations committed by forestry enterprises themselves: cutting without approved forest management materials, sanitary felling in the “quiet season”, sanitary felling of healthy forests, continuous felling without environmental impact assessment procedure, etc<sup>3</sup>.

2) neglect of the environmental importance of forests in the SFRAU decision-making process, as its regulatory activities are aimed primarily at meeting the economic needs of the state and individual forest users.

### 2. Contradictory normative documents regulating cutting.

Cutting in the Ukrainian forests is directly regulated by 5 different resolutions of the Cabinet of Ministers of Ukraine<sup>4</sup>, which is manifested in different rules of cutting. For example, skidding logs along watercourses is formally prohibited only during final cutting in the mountain forests of the Carpathian Mountains. Although the impact of skidding on river ecosystems in no way depends on the type of cutting during which this timber was obtained.

At the same time, none of the afore mentioned regulations establishes certain cutting rules within the territories and sites of the nature reserve fund. Consequently, cutting in the NRF territories and sites is designed and carried out according to the same principles as in operational forests, only subject to the restrictions established by the law. Thus, economic interests of forest users are higher than environmental feasibility, even when cutting is planned within the NRF boundaries.

### 3. Delays in adoption of important documents due to forest industry resistance and “anti-environmental” lobby.

Thus, draft laws “On State Environmental Control” 3091 and 5650 (on forest conservation) faced serious opposition before the second reading and therefore may lose the important provisions. The project of the State Forest Management Strategy of Ukraine till 2035 has still not been approved by the Government, though it has been 8 months since the public discussions of the report on SEA

### 4. Absence of state policy on forest management reforms aimed at nature-close forestry.

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<sup>1</sup> Paragraphs 4-5 of the Regulation on the State Forest Resources Agency of Ukraine  
<https://zakon.rada.gov.ua/laws/show/521-2014-%D0%BF#Text>

<sup>2</sup> Regulation on the State Environmental Inspectorate of Ukraine <https://zakon.rada.gov.ua/laws/show/275-2017-%D0%BF#Text>

<sup>3</sup> How the reform of environmental control contribute to the decrease in illegal cutting  
<http://epl.org.ua/announces/yak-reforma-ekologichnogo-kontrolyu-spryyatyme-skorochennyu-nezakonnyh-rubok/>

<sup>4</sup> It goes about Final Cutting Regulations, Final Cutting Regulations in the mountainous forests of the Carpathians, Sanitary Rules in the Ukrainian Forests, Rules on improving the Quality Composition of Forests, as well as the Order of the Special Use of Forest Resources, approved by separate resolutions of the Cabinet of Ministers.



Ukraine's forestry is still guided by outdated approaches, with valuable natural forests often being cut down in clear-cutting, replaced by monocultures, while the interests of biodiversity conservation and forest ecosystem services remain secondary.

Despite their much greater negative impact on the environment, clear-cutting is still the basic method of commercial timber harvesting compared to selective and gradual felling. Thus, during 2016-2020, from 81.5% to 91% of all final cutting were clear-cutting. At the same time, after cutting foresters create mostly monocultural plantations, often in places where previously there were natural mixed forests.

Due to the prevalence of this approach to forestry activities, forest biodiversity is being depleted and the ability of forests to provide ecosystem services is declining. Apart from this, monoculture coniferous plantations are very vulnerable to fires that can rapidly spread in such forests

#### 5. Cutting of environmentally valuable forests and lack of progress in creating forest nature conservation areas.

In a number of cases foresters refuse to approve creation and expansion of national nature parks in valuable natural forests, and carry out intensive cutting in these areas, which leads to degradation and loss of ecological value of such forests. For example, for many years it has not been possible to obtain approval of regular forest users for the creation of NNP "Chornolisky", "Iziumska Luka", "Dniprovsko-Tetetrivsky", as well as for the expansion of Dzharylgach and Dermansko-Ostrohsky national parks.

#### 6. Destruction of unaccounted forests and possibility of steppe ecosystems afforestation within the frameworks of Ukraine's forest cover extension.

There are hundreds of thousands of hectares of forests in Ukraine that do not have such a legal status and are considered mainly as agricultural lands<sup>5</sup>, and therefore are being destroyed in catastrophic proportions. At the same time, both self-seeding forests that have grown in 20-30 years in abandoned fields and 40-60-year-old forest crops growing on lands for which forestry documents have not been issued in time are disappearing<sup>6</sup>.

Alongside with that, the President's programme "Green Country" plans to plant 1 billion new trees for 3 years, and for 10 years the forest cover should grow by 1 million hectares<sup>7</sup>. At the same time, the indicators of regional norms of optimal forest cover of the territory, approved by the Order of the Ministry of Environment, allow to significantly increase the indicators of steppe regions afforestation. In this situation there is a significant risk of mass creation of new forests in place of steppe ecosystems.

This will not only destroy the latter, but also prevent creation of sustainable forests. After all, plantations in arid conditions will be extremely favourable for the spread of fires. Of all the steppe regions, only in Kherson region the recommendations of scientists were taken into account and all valuable steppe ecosystems remained without afforestation<sup>8</sup>.

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<sup>5</sup> Unaccounted Forests of Ukraine. Policy Brief <http://epl.org.ua/eco-analytics/neoblikovani-lisy-ukrayiny-analitychna-zapyska/>

<sup>6</sup> Due to inactivity of the authorities hundreds of hectares of forests are destructed in Zhytomyr region. EPL: <http://epl.org.ua/announces/chez-bezdiyalist-organiv-vlady-na-zhytomyrshhyni-znyshhuyutsya-sotni-gektariv-lisiv/>

<sup>7</sup> "Green Country": how the forest cover will change within the frameworks of the President's programme implementation. State Forest Resources Agency of Ukraine <https://forest.gov.ua/news/zelena-krayina-yak-zminitsya-ploshcha-lisiv-v-ramkah-realizaciyi-programi-prezidenta>

<sup>8</sup> Valuable Kherson steppes are preserved from afforestation! – Ukrainian Nature Conservation Group <https://uncg.org.ua/zalishennia/>

## 7. No combatting invasive species expansion in forestry.

A number of forestry enterprises continue using invasive species for reforestation and afforestation. Thus, Berezhany forest enterprise in Ternopil region is planning to plant 210 hectares of new forests, using, in particular, red oak<sup>9</sup>. There is still no officially established list of invasive species, bans on their use in forestry and requirements for their control.

## **EU experience in implementation of forest policy goals and major goals of EGD in forest management**

In July 2021 the European Commission approved the EU's 2030 New Forest Strategy<sup>10</sup> that establishes for the EU 6 priority strategic goals (directions) in forest management. Each of these 6 major goals establishes a range of lower level goals – strategic tasks – necessary for their implementation.

### 1. Supporting the socio-economic functions of forests for thriving rural areas and boosting forest-based bio-economy within sustainability boundaries.

Recognizing crucial economic and social significance of forests, in particular 2,1 million of jobs in traditional forest sector of the EU, generating a gross value added of EUR 109,86 bln, and harvesting from forests within the EU boundaries non-wood products at estimated value of 19,5 bln EUR per year, New Forest Strategy of the EU sets out the following tasks:

- Wood of high ecological value should not be used, and the wood-based bioeconomy should remain within the boundaries of sustainability and be compatible with the EU's 2030 and 2050 climate targets and biodiversity objectives;
- the upcoming EU carbon farming initiative and carbon removal certificates framework should include dedicated actions for the production and the use of long-lived wood products, in the full respect of biodiversity objectives;
- the supply of wood products should be done in synergy with improving the conservation status of European and global forests, and preserving and restoring biodiversity for forest resilience, climate adaptation and forest multifunctionality;
- strengthening sustainability criteria for bioenergy, including enlargement of areas, where it is prohibited to source raw materials (for instance, from primary forests) and there are limitations in highly biodiverse forests to ensure no interference with nature protection purposes;
- to mitigate the potential climate and environmental risks, the use of whole trees for energy production, whether from the EU or imported, should be minimised, and to reinforce implementation of the cascading principle, which prioritizes usage of wood for manufacturing wood products and extending the term of their sell-by date, re-usage and processing of wood, and only after this — bioenergy and disposal of wood products.
- EU member-states should design their support schemes for the use of biomass for energy in a way that minimises harmful impacts on biodiversity;

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<sup>9</sup> <http://eia.menr.gov.ua/uk/case/id-8060>

<sup>10</sup> New EU Forest Strategy for 2030. Brussels, 16.7.2021 COM(2021) 572 final <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52021DC0572>

- European Commission will promote collaboration between the tourism sector, forest-owners and nature protection services for eco-tourism activities in the EU, and the elaboration of coordinated and integrated regional, national and subnational programmes on the sustainable production of non-wood forest products.
2. Protecting, restoring and enlarging EU's forests to combat climate change, reverse biodiversity loss and ensure resilient and multifunctional forest ecosystems.

Nowadays forests and other wooded land cover over 43,52% of the EU's territory. At the same time, seriously fragmented patches of primary and other old growth forests now cover only 3% from all forested land of the EU. Yet they belong to the richest EU's forest ecosystems, retain significant amount of carbon and play an important role in providing other vital ecosystem services.

In this area the Commission set the following goals for the EU:

- protect at least 30% of the EU land area forest ecosystems under effective management regime and to put 10% of the EU land under strict legal protection;
- EU member-states should map the primary and old-growth forests within their boundaries, and ensure deterioration of these forests before strict protection regime is applied;
- within implementation of the EU 2030 Biodiversity Strategy the Commission has to provide a legally binding instrument for ecosystem restoration, including forest ecosystems;
- develop guidelines on biodiversity friendly afforestation and reforestation;
- EuroCommission should complete development of regulatory frameworks on carbon removal certification, and also provide advice and technical guidance on the development of ecosystem service payment scheme;
- EU countries should develop national payment schemes for ecosystem services for forest owners and managers to cover their expenses and lost income;
- provide guidance and promote knowledge exchanges on good practices on climate adaptation and resilience;
- increase usage of rural areas development funds for Forest Strategy objectives.

### 3. Strategic forest monitoring, reporting and data collections

Today the information concerning the status of forests in the EU, their social and economic value, as well as the pressures they face and ecosystem services they provide, is patchy. The EU still obtains data on forest biodiversity only within the boundaries of nature conservation territories. On the other hand, the EU has several scattered monitoring and reporting mechanisms, but no strategic framework, which would bring these together.

The following EU goals till 2030 have been set out:

- enhance the existing monitoring of climate impact and other natural or man-made violations on forests, within the framework of the Forest Information System for Europe (FISE) and on the basis of the improved Copernicus products<sup>11</sup>, other data of remote sensing and ground monitoring. FISE will become the cornerstone for forest data coordination in Europe;
- prepare and publish regular reports and lay summaries on the forests in the EU with the support of a broader European forest science partnership;
- develop a European forest science partnership, with a view to support the development of new indicators based on remote sensing and the latest research results;

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<sup>11</sup> Copernicus (previously — GMES, Global Monitoring for Environment and Security) is the European Union Programme on global Earth monitoring to improve the quality of life of European citizens, and not only. <https://www.copernicus.eu/en>



- in full respect of the subsidiarity principle<sup>12</sup>, the EU countries should prepare their Strategic Plans for Forests and the Forest-Based Sector for the nearest 10, 30 and 50 years;
- part of forest areas, included in forest management plans, should cover all the forests under public management and more and more private forests.

#### 4. A strong research and innovation agenda to improve our knowledge on forests

According to the EU 2030 New Forest Strategy, the goal sets out the following tasks:

- in cooperation with the Member-states and stakeholders the Commission should develop a “Planning our Future Forests” research and innovation agenda by jointly identifying research gaps and future priorities for forestry and the forest-based sector;
- support the evidence-based design and implementation of forest restoration strategies with engagement of the society and in different ecological and socio-economic settings, including through the planned research and innovation mission on soil health for forest soils;
- through the Horizon Europe Civil Security for Society Programme implement complementary actions in support of Disaster Risk Reduction policies (including forest fires) to enhance capacities in risk management;
- develop a Citizens’ science Programme for forest biodiversity, notably engaging citizens and civil society in monitoring forest biodiversity.

#### 5. Inclusive and coherent EU forest governance framework.

The wider contribution of forests to the European Green Deal objectives on climate, biodiversity and sustainable bioeconomy necessitates a more inclusive and better coordinated EU forest governance structure. In this area the following tasks have been set out for the EU:

- transparency of the governance should be guaranteed so that everyone can follow how the Commission and the Member States deliver on the objectives of the new EU Forest Strategy;
- propose and implement EU forest governance system that promotes policy coherence and synergies between the different functions a sustainable and climate neutral European economy requires forests to deliver, and allow for an inclusive space for Member States, forest owners and managers, industry, academia and civil society to discuss forest policy matters;
- building on the extensive experience of the Civil Dialogue Group on Forestry and Cork and Working Group on Forest and Nature, create a single expert group to ensure synergy of the activities of civil society, forest owners and forest managers, industry and academia to extend membership and focus on implementation of the new EU Forest Strategy.

#### 6. Stepping up implementation and enforcement of existing EU acquis on forests.

Currently the EU already has powerful environmental legislation regulating, in particular, relations in the field of forest use and forest management. Thus, the Habitats and Birds Directives of the EU provide for the conservation of a good range of forest habitats and of forests-related animal and plant species, Environmental Liability Directive requires the prevention and remediation of environmental damage involving forest habitats, while the Environmental Crime Directive criminalises certain conduct that involves damage to protected forests. The EU Timber Regulation (EUTR) bans the entrance of illegal timber in the EU and lays down obligations of operators who place timber and timber products on the EU market. The fight against environmental crimes is a

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<sup>12</sup> One of the general principles of the EU legislation, stating that decisions should be taken at the level as close to the citizens as possible, wherever it may be the case <https://eur-lex.europa.eu/summary/glossary/subsidiarity.html>

priority in Europol's latest Serious and Organised Crime Threat Assessment (SOCTA) report (2021) and the new EU Strategy to tackle organised crime for the years 2021-2025<sup>13</sup>.

In this area the EU has the following tasks:

- reviewing and updating the aforementioned Directives;
- checking the Timber Regulation and Forest Law Enforcement, Governance and Trade Regulation (FLEGT) and update the rules against cutting and forest degradation till 2021;
- analysing if it is appropriate to set minimum standards for third party certification schemes to ensure adequate standards of reliability, transparency and independent audit;
- supporting civil society's role as a compliance watchdog and engage with Member States to improve access to justice in national courts in environmental matters for individuals and NGOs.
- revising the Aarhus Regulation will strengthen civil society's role with regard to EU decision-making.

As of December 2021 the final draft of the [EU Regulation](#) has been prepared aimed at prevention presence at the EU market not only of the illegal timber, but also of timber which is produced through deforestation and degradation of forests in any corner of the world. Apart from this, under restriction is the import of other products related to deforestation, for example, soy, palm oil, beef, coffee and cacao.

### **The price of not resolving the problem in the field of Ukrainian forest management**

Lack of real actions to solve problems in the field of forest management in Ukraine in the coming years will lead to further rapid degradation of forest ecosystems under conditions of increasing man-made pressure and climate change (more frequent and severe droughts, fires, pests expansion).

Natural forests that do not have protection status will be gradually transformed into monoculture plantations. Invasive species will spread rapidly due to their use in reforestation and afforestation, and this will lead to the depletion of natural forest ecosystems. Self-seeding forests and unaccounted forest crops will be destroyed, which will reduce the real forest cover of Ukraine. At the same time, due to implementation of the afforestation programs in Ukraine valuable steppe areas will be destroyed in Ukraine as the new climate non-resistant forests will be created in these territories. Moreover, the forests will continue suffering from illegal cutting by regular forest users, for which the latter will not bear real legal responsibility.

The combination of all these negative processes in the near future threatens to significantly worsen the state of Ukraine's forest resources, lead to the loss of the state forest sector and deprive Ukrainians of access to a number of important ecosystem services provided by forests.

Against the background of such prospects, it is quite logical that the lack of progress in resolving the above-mentioned systemic problems in fact makes it impossible for Ukraine to join the goals of the European Green Deal in the field of forest management.

Therefore, it is extremely important to implement the following recommendations in order to achieve balanced forest management and join the key goals of the EGD.

### **Suggested recommendations to solve the key issues**

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<sup>13</sup> Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the EU Strategy to tackle Organised Crime 2021-2025, COM(2021) 170 final.

## **1. Regulatory changes:**

### **To the Verkhovna Rada of Ukraine**

1) to adopt the draft law “On State Environmental Control” (№ 3091) keeping in place all major provisions, namely, establishment of a new agency for environmental control and preventing duplication of functions regarding forestry control;

2) to adopt the draft law “On Amending Certain Regulations on Forest Preservation” (№5650)<sup>14</sup> that provides inclusion of self-forested areas to the forest fund and possibility to do forest activities at the discretion of land owner, purchase of private lands by the state for afforestation and forest reserves, and ban on afforestation of the steppe ecosystems and invasion of foreign species in natural ecosystems;

3) to pass the bill “On the Territories of Emerald Network” (№4461) that will provide for legal recognition of the Emerald Network in Ukraine and development of these territories management plans and introduce the environmental impact assessment in the areas of Emerald Network.

4) to pass the bill on updating the environmental impact assessment procedure (№5766) envisaging the list of grounds for providing the EIA report on the inadmissibility of the planned activity, for refusal in issuing the EIA report, and setting the procedure for the preliminary analysis of the EIA report by the authorized agency;

5) to develop and pass the bill on strengthening responsibility of forest users for violation of nature protection legislation in the process of forestry activity, in particular (and especially) during cutting;

6) to develop and adopt the draft law on the state environment monitoring system presupposing widespread application of Earth remote sensing and other modern methods of monitoring;

7) in synergy with scientists and the environmental community to develop and adopt a draft law that will provide for a simplified system of allocating the degraded arable land for the restoration of natural ecosystems, including forest ones - where they were natural. The draft law should include a legally binding tool for ecosystem restoration, covering in particular those ecosystems that have the greatest potential for carbon capture and storage, as well as for preventing and reducing the impact of natural disasters.

### **To the Cabinet of Ministers of Ukraine**

1) to approve the State Forest Management Strategy of Ukraine till 2035 in the edition coordinated with the general public, which is the edition that mainly meets the objectives of the EU 2030 Forest Strategy;

2) to approve the Regulation “On Approving the Procedure for Creation of Protection Areas to Preserve Biodiversity in Forests and the Procedure for Creation of Protection Areas to Preserve the Species of the Red Book of Ukraine” considering the comments of the general public<sup>15</sup>;

3) to develop and approve the methodology of ecosystem services evaluation, namely for forest ecosystems;

4) to develop in cooperation with a wide range of stakeholders, namely academia (majoring in forestry and biology) and environmental community, and approve the normative document regulating forestry activities, namely all types of cutting, in the forests of Ukraine of all forms of ownership;

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<sup>14</sup> [http://w1.c1.rada.gov.ua/pls/zweb2/webproc4\\_2?id=&pf3516=5650&skl=10](http://w1.c1.rada.gov.ua/pls/zweb2/webproc4_2?id=&pf3516=5650&skl=10)

<sup>15</sup> <https://mepr.gov.ua/news/38242.html>

5) to ban usage of round wood from natural forests as timber for industrial bioenergy to mitigate environmental and climate risks;

6) to develop regulatory framework for certification of carbon removal by natural ecosystems, forests including.

### **to the Ministry of the Environment**

1) to adopt the order “On Approving the Order of Forest Management” providing for the integration of the basic forest management with EIA procedure related to final and gradual cutting and afforestation;

2) in cooperation with academia and general public to develop and approve by the Order of the Ministry of the Environment the comprehensive research program in forest industry to identify future industry priorities considering environmental, economic and social functions of forests.

### **2. Institutional changes:**

1) to set up a separate state enterprise responsible for managing state-owned forests via separate subsidiary enterprises (current state forestry enterprises) independently from the State Forest Agency;

2) to set up the State Nature Protection Service of Ukraine that will provide centralized coordination of the nature and reserve fund institutions and will be responsible for protection and management of other NRF sites and Emerald Network territories. It will also develop management plans for forest (and other) sites of Emerald Network;

3) in cooperation with the general public to develop and adopt the National Plan for Implementation of the State Forest Management Strategy of Ukraine till 2035, which, in particular, will provide for the activities on enforcement in the Ukrainian forests of the nature-close forestry;

4) to establish the National Landscape Fire Protection Service responsible for prevention and liquidation of forest fires;

5) to ensure at the level of the Ministry of the Environment, State GeoCadastre, State Forest Resources Agency and regional state administrations activities on steppe areas identification and their afforestation prevention;

6) to grant the Ministry of the Environment and departments for environment at the state regional administrations wide authority regarding comprehensive environment monitoring, and provide more human resources for the relevant bodies to ensure high-quality performance in the field of environment monitoring;

7) to grant the State Forest Resources Agency powers and responsibility on:

- coordinating the process of identification, approval and creation of the old-growth forest nature monuments;
- collection and publishing information of estimated value of non-wood products and services provided annually by the forests of Ukraine;
- coordinating implementation of actions for “cascading” use of the used timber;
- stimulating development of tourism in the Ukrainian forests and promoting cooperation of forest users with tourism sector;

8) to ensure good performance of state regional administrations with respect of creation protection areas to preserve biodiversity in forests and sites of the Red Book of Ukraine;

9) to ensure responsibility of State Forest Resources Agency of Ukraine and Ukrainian Research Institute of Forestry and Forest Melioration for implementation of the comprehensive research program in forestry;

10) to ensure cooperation of regular forest users, scientific institutions and organizations, as well as general public on joint collection and record in forest management materials data on forest biodiversity, namely location of the protected species, habitats and groupings;

11) to establish standing task force at the Ministry of the Environment engaging regular forest users, forest owners, business community related to forest resources, academia and general public to follow implementation of the State Forest Management Strategy of Ukraine and, if necessary, its periodic review.

### **3. Budget changes:**

1) as of 2023 annually envisage funds in the state budget for the purchase of privately owned self-afforested land plots to transfer them in the permanent use to the state forestry enterprises for forestry, as well as the purchase of privately owned ecologically valuable natural areas for the creation of territories and sites of NRF;

2) as of 2023 to ensure adequate annual funding from the state budget of Ukraine for the activities of the newly established central body of the state environmental control;

3) to ensure adequate funding of the implementation of the National Action Plan for the implementation of the State Forest Management Strategy of Ukraine till 2035;

4) to ensure the attraction of sufficient funds from the general and special funds of the state budget for the quality basic forest management in state forestries;

5) to attract funds from the European Union to compensate for the losses incurred by landowners and land users caused by the restrictions in accordance with the management plans of the Emerald Network territories;

6) provide a mechanism for monetization of the ecosystem services for owners and regular users of particularly valuable forests;

7) to ensure allocation of a fixed part of the state forestries' profits for the implementation of the forest research program in Ukraine.

## **Conclusions**

Despite the constant urgency and public attention, Ukraine has not yet been able to solve key systemic problems in the field of forest management - from the concentration of excessive powers in the State Forest Agency and ineffective control over activities of forest enterprises, to the lack of environmental and social functions of forests and current challenges, such as climate change, biodiversity loss and forest degradation during decision-making process and forest management planning. Consequently, Ukraine's forestry and forest management system remains inefficient and outdated.



Given Ukraine's intentions to join the European Green Deal, which integral part is to ensure the sustainable and balanced use of forest resources and avoid forest degradation and deforestation, our country is faced with a crucial task of the urgent reform in the forest sector.

Addressing key issues in this area requires, first of all, political capacity to implement the already developed recommendations among the parliamentary majority, as well as among the leadership of key central executive bodies responsible for formulating and implementing forest management policy. It is also necessary to ensure willingness to develop, in cooperation with all the stakeholders, approve and implement new regulations, which are needed in respect with EGD objectives.

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