



Brussels, 21.1.2015
COM(2015) 32 final

**REPLIES OF THE COMMISSION TO THE SPECIAL REPORT OF THE
EUROPEAN COURT OF AUDITORS**

**"IS EU SUPPORT FOR PREVENTING AND RESTORING DAMAGE TO FORESTS
CAUSED BY FIRE AND NATURAL DISASTERS WELL MANAGED?"**

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"IS EU SUPPORT FOR PREVENTING AND RESTORING DAMAGE TO FORESTS CAUSED BY FIRE AND NATURAL DISASTERS WELL MANAGED?"

EXECUTIVE SUMMARY

IV. The Commission considers that in general forest disaster prevention measures contributed to the objectives of the rural development programmes. Concrete results have been achieved and fewer occurrences of fire took place. Moreover, lessons have been learned which are applied in relation to the 2014-2020 period, especially as regards the scope of the measure and improved guidance.

V. The Rural Development Regulation¹ provides that preventive actions against fires should cover areas classified by Member States as high and medium fire risk according to their protection plans. These forest protection plans and the Member States national or sub-national forest programmes or equivalent instruments provided appropriate base for targeting and prioritisation during selection.

The Commission analysed the situation of the forest sector including forest disaster prevention and monitoring aspects in the 2005 Commission Staff Working Document which formed an annex to the Communication on the implementation of the EU Forestry Strategy². The Rural Development Regulation requested that forestry measures should contribute to the implementation of the Community Forestry Strategy. The above mentioned Forestry Strategy covers economic, environmental and social aspects of sustainable forest management.

As regards the new programming period, the Commission analysed the situation of the forest sector in the 2013 Commission Staff Working Document, which formed an annex to the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: "A new EU Forest Strategy: for forests and the forest-based sector."³

VI. As part of the sustainable forest management practices, forest roads (or other investments) built primarily for prevention purposes against fires can also be used for preventive actions against other risks as well as for the restoration and remedy works, recreation or economic purposes. The creation of an appropriate network of forest roads not only contributes to a better protection of forests against fire, but also to a sustainable economic valuation of forest resources in many regions. Often, these actions need to be done in order to avoid complete loss of socio-economic interest of forest areas which may lead to their abandonment and ultimately to an increased fire risk.

As regards the new programming period, guidance fiches have been prepared in order to ensure that the Member States / Regions use the measure correctly. Moreover, the Members States / Regions will have to specify their needs and reasons better, if they wish to expand the density of their road systems.

VII. Under the share management, the Commission adopts the national or regional RDPs, while the implementation and ensuring of the cost effectiveness and efficiency of the support are under the responsibility of the Member States and their Management Authorities.

¹ Council Regulation (EC) No 1698/2005)

² Commission staff working document - Annex to the :Communication on the implementation of the EU Forestry Strategy {COM(2005) 84 final} /* SEC/2005/0333 */ http://ec.europa.eu/agriculture/forest/1998-strategy-2006-action-plan/sec-2005-333_en.pdf

³ COM(2013) 659 final: http://ec.europa.eu/agriculture/forest/strategy/index_en.htm

As regards the use of manual work instead of machinery, sometimes such choices can be linked to the characteristics of the terrain (orography, environmental aspects etc.) and should be seen in a wider rural development context.

VIII. A careful balance needs to be made between the costs of the monitoring and evaluation and their potential benefits. Especially, in the case of measuring preventive actions it is difficult and hence expensive to establish the causality chain. Moreover, the effectiveness of particular forestry interventions can be assessed only after several years or even decades.

As regards the 2014-2020 period, improvements have been introduced. For instance, a new 'area supported' indicator for preventive actions will be collected in the CMES. Moreover, in order to get valuable evaluation results, an enhanced Annual Implementation Report is foreseen in 2019. In the framework of this report, an evaluation of the RDP will be carried out and first results on the efficiency of the RDP will be provided.

IX.

First alinea

(b) The Commission considers that Natura 2000 forests represent high environmental values and produce important and various ecosystem services. Furthermore, several Natura 2000 provisions apply to all forest across the EU, both within and outside Natura 2000 sites and in this respect the role of forests outside Natura 2000 is also very relevant.

(c) The Commission considers that the new Rural Development Regulation includes a revised measure concerning forest protection and restoration. The new measure can provide support for actions related to prevention and restoration of damage to forests from forest fires and natural disasters and catastrophic events and may also provide support for preventive actions concerning pests and diseases under the condition that the risk of a relevant disaster occurrence is supported by scientific evidence and acknowledged by scientific public organisations.

(e) A number of environmental safeguards are already available with regard to the supported actions. For example in Natura 2000 the protection regime under Article 6.2 and 6.3 of Habitats Directive⁴ guarantees that any significant deterioration of those areas is being avoided. In other areas environmental impact assessments will also contribute to preventing environmental counter-effects. Finally, for all actions to be co-financed by EU funds, a certificate of good environmental practice or sustainable forest management could be required from the competent national authorities as a pre-condition to EU co-financing.

In the new programming period, the environmental performance of the beneficiaries is at the forefront of the implementation of the different measures.

(f) The Commission considers that, when standard costs are applied in the programmes, the Member States/Regions shall ensure that the relevant calculations are adequate and accurate and established in advance in a fair, equitable and verifiable manner. An independent body should be designated to make the calculations for all the standard costs or to confirm the adequacy of the calculations.

(g) A guidance document on controls and penalties in rural development is being prepared and discussed with the Member States. The Annex I of this document contains a checklist for the Member States for the assessment of the reasonableness of the costs.

Second alinea

⁴ Council Directive 92/43/EEG

(a) The Commission is currently implementing the recommendation.

The need for an appropriate description of the preventive actions is included in the Needs Analysis section in the Strategy in the RDP for 2014-2020 and in some cases also at the level of Partnership Agreements.

The Commission examines the submitted RDPs and checks the intervention logic and the needs for prevention actions during the program approval period and requests that preventive actions are based on the protection plan of the area concerned.

(b) The Commission accepts the recommendation.

The Commission will examine with national authorities the possibility of the appropriate level of action in the field of common basic criteria to differentiate forest areas to be classified as low, medium and high fire risk.

(c) The Commission is currently implementing the recommendation.

The Commission carries out conformity audits in the Member States to verify that the expenditure paid is in compliance with the rules. If during the audit weaknesses are found, financial corrections are applied.

The measures and the paying agencies to be audited are determined on the basis of a risk analysis. The financial importance plays a major role in the quantification of the exposure to risk. It means that an audit area with high expenditure is more likely to be highly ranked and audited. Measure 226 has been audited in 2014 and will be audited in 2015.

(d) The Commission is currently implementing this recommendation through the legal framework for RDP's and additional guidance.

The new measure covers broader scale of risks and damages. For the period 2014-20 the relevant measure fiche as a guidance document includes detailed requirements and clarifications and as such may serve as a helping tool for the Member State for appropriate design of the measure.

The attention of the Member States/Regions was drawn that in the event of uncertainties concerning the purpose of the actions, there are other measures specially targeted to increase the economic value of the forests.

(e) The Commission accepts the recommendation.

Some adaptations have already been introduced: for instance, the 'area supported' indicator for preventive action will be collected in the 2014-2020 CMES.

In order to get valuable evaluation results earlier, an enhanced Annual Implementation Report will be introduced in 2019. This enhanced AIR provides an assessment of programme results and, when possible, an assessment of impacts.

INTRODUCTION

1. The Commission considers that since forests are multifunctional and serve economic, social and environmental purposes by providing vital ecosystem services, their functions cannot be entirely separated. Therefore, forestry measures targeting primarily economic purposes may also serve social or environmental objectives. Primarily protective interventions may also have social, economic and other environmental benefits. The specific character of forestry processes should be considered during the design, management and control of forestry measures.

4. The decrease of the burnt area can be due to good implementation of the forest fire preventive systems facilitated by the measure.

The statistics might show that the burnt area is more or less at a stable level now, which doesn't mean that there is no increasing threat of forest fire and other calamities.

5. Forest fires have also an important socioeconomic impact, affecting livelihoods dependent on forests and creating distortions in the wood markets and causing casualties.

OBSERVATIONS

21.

First bullet: The Commission considers that the ongoing work of the European Commission's Forest Fire Expert Group and the Standing Forestry Committee acting as a consultation and information platform with the Member States provides appropriate information to the Commission on forest fires and other calamities, including pests and diseases. Submitted RDPs include a chapter on description of forests and environmental situation and this information supports the assessment of the programme proposals.

In addition, the establishment of the Forest Disturbances module of the Forest Information System for Europe (FISE), following the recent Communication on the EU Forest Strategy, will reinforce the overview of the forest related natural disasters.

Second bullet: The RDPs include the SWOT analysis which guides the Member States and regions to make strategic choices regarding the priorities, objectives and measures to be included in the programme and should also establish the baseline for monitoring and evaluation of the programme.

Common reply 22-24:

There are significant bio-geographical and climate- related differences in the Member States from the Nordic Circle to the Indian Ocean (Reunion island FR), therefore the forest fire classification should reflect the characteristics of the region under fire risk.

Regulation No. 2158/92 requested that this classification should be proposed by the Member States and approved by the Commission.

In the current EAFDR, Member States do not need to propose the designation of areas at different fire risk levels to the Commission. It is the competence of the Member States to designate such areas. All the new Member States are in the Expert Group on Forest Fires and co-operate in the activities of the EFFIS. Information on forest fires is thus available. These provisions indicate the common intention of the Commission and the Member States to keep the forest fire prevention measures targeted and coherent as far as possible, taking into account significant differences between the Member States bio-geographical conditions.

One of the objectives in the establishment of the European Forest Fire Information System is to have harmonized information on forest fires across Europe. This information is essential in activities of mutual collaboration on forest fire prevention and fighting.

25. The Commission services are aware of the general forest fire risk of a Member State or a region when analysing the RDPs.

The Commission has proposed a methodology for the assessment of forest fire risk in the context of the activities of EFFIS. However, an additional work is needed, in collaboration with the MS, to derive a harmonized forest fire risk map of Europe.

26. The Commission has invited the Slovak authorities to substantially review the methodology of classification of forest areas at fire risk in the Observation Letter addressed during the negotiation of the RDP 2014-2020. The Commission will closely examine with the Slovak authorities the establishment of the needs for the period 2014–2020 taking into account the long-term data on the occurrence of fires and the proportionality of funding with prevention.

27. The Commission considers that it has comprehensive information on the historical evolution and the projected evolution of the natural disasters and other catastrophic events, potential development of pests and diseases in the context of FISE and through studies (e.g. on forest adaptation to climate change⁵ or other studies on calamities⁶). However, that information is not yet harmonised across Member States. The Commission also follows the requests of Member States for activation of the European Solidarity Funds after major disasters and their requests for modification of the rural development programmes. Moreover, Member States regularly inform the Standing Forestry Committee on major extreme events.

28. The Commission is currently working on the establishment of the Forest Information System for Europe (FISE). A prototype of the system will be available and presented to the Standing Forestry Committee in December 2014.

29. The Commission considers that it has an appropriate level of knowledge on the types of natural disasters affecting forests and also on the needs for disaster prevention for the analysis of the RDPs through direct contacts with the Member States and regions, regular EU Forest Directors meetings and the on-going work of the Standing Forestry Committee and FISE.

30. Considering, there is no common definition of the "most valuable forest areas", the Commission would support the establishment of some kind of 'priority action framework' for EU co-financing, similar to what already exists in all Member States for the financing of Natura 2000 by the different EU funds. Member States' priorities as formulated in that framework would then be reflected in the selection.

Common reply to 31 – 33:

One of the criteria fixed by the Managing Authority for the selection of the operations is the coherence with the Regional Forestry Plan, and with other planning instruments for forests. This ensures a certain quality of the operations selected and priority is given to interventions in areas with higher risk of forest fires.

Moreover, as regards forest fire prevention programmes supported by EU funds since 1992, Member States have considerable expertise in the prioritisation of projects.

At the regional/MS level the forest protection plans contain the information how to treat forest fire and other calamities. Information is also available at the administrative level of provinces (NUTS-3 level) on the location, size and cause of forest fire. In the new programming period, the Commission requested that in the Rural Development Programmes the prevention and protection needs should be enforced by the forest protection plan.

34. Austria established a system for the selection of projects which was approved by the Monitoring Committee on 19 June 2014. The system is a 3-step approach built on the eligibility conditions as described in the measures, additional national legal provisions and, if relevant, on more detailed criteria. This new system should ensure a high level of quality of the operations selected for the 2014-2020 programming period.

35. Member States have been establishing the Priority Action Frameworks (PAFs) for the financing of their Natura 2000 networks since 2012. In the new financing period these PAFs will represent a most useful tool for prioritizing actions in Natura 2000 sites. The Commission will make sure that the actions proposed for Natura 2000 sites in line with the respective member States' PAFs, but also

⁵ Impacts of Climate Change on European Forests and Options for Adaptation
http://ec.europa.eu/agriculture/analysis/external/euro_forests/index_en.htm

⁶ <http://ec.europa.eu/environment/forests/studies.htm>

actions in other environmentally valuable areas such as for example national parks will be given adequate priority.

The Commission considers that forests are multifunctional and environmental values should be seen in the right context. Therefore, the selection criteria developed by the programmes should also involve other aspects of sustainable forest management.

Furthermore, several Natura 2000 provisions apply to all forest across the EU, both within and outside Natura 2000 sites.

Box 1 – Prioritising environmental needs at Member States’ level

The Slovak authorities have proposed to include environmental criteria among the selection criteria of sub-measures 8.3 and 8.4 (prevention and restoration of damages in forests) under the RDP 2014-2020.

As regards specific interventions in France, they should be selected according to the local conditions. In the case of dry sandy soil with very limited organic content in the top layer the utilization of bulldozers could be considered appropriate and may provide a quick solution for the restoration of the damaged area. In certain areas, regarding to their specific bio-geographical conditions, an appropriate quick reaction is necessary for the prevention of proliferation of pests and diseases (which could have negative effects on non-damaged or protected forests), decreasing the forest fire risk and avoiding desertification should be a high priority.

37. Forest roads serving fire prevention objectives can also be used for other purposes. They play an important role in the restoration and prevention of negative effects of calamities. Furthermore building two types of roads, one for forest fire prevention and another one for other purposes, would lead to an ineffective and high-cost investment.

In Slovakia forest roads built for forest fire prevention in the framework of the rural development programmes were efficiently used for quick restoration actions after the current storms and windfalls. The improved access helped minimise the risk of further calamities (fires or pests outbreaks) and with the help of the proper access the soil disturbance was minimized which saved the organic matters of the soil and was beneficial to the flora and the soil fauna.

There are no efficient mechanisms for protection of forests from calamities caused by wind or snow. Therefore, actions mainly focus on forest fire prevention. The prevention actions are never linked to the occurred abiotic damages, but to prevent them. Therefore, the proportion of public support on prevention actions against fire cannot be directly linked to the damage caused by fire.

See also reply to point 50.

38. The assessments of risks to forests are financed by EU and national funds. Austria attributes certain amounts (quotas) of EU funds to the different regions. The rest is financed by national funds.

Common reply to points 39 - 41:

The budget of measure 226 is available for all types of forests, private and public. Although during the implementation of the program public forests received a higher financial support, this is neutralised in terms of hectares supported. According to the 2013 annual progress report for Andalusia, 78 % of the forest area supported was private.

The Commission considers that it is up to the Member States and Management Authorities to select the best projects taking into account their socio-economic and geographical conditions and to justify the appropriateness of the calculation of the applied costs.

The support for labour-intensive activities can be linked to the characteristics of the terrain (orography, environmental aspects etc.) and should be seen in a wider rural development context.

42. The Commission considers that burning, as a method of clearing areas is a very risky operation. It is subject to very restrictive administrative conditions and it is not socially accepted.

44. The Commission considers that due to the increased frequency and strength of heat waves and prolonged droughts ("primary cause"), which under certain conditions can also be declared as natural disasters, some programmes introduced actions against "secondary damages" (pests and diseases) preventing larger scale of proliferation of damages causing serious environmental and socio-economic consequences. Therefore, it can be considered that interventions supported through rural development measures successfully contributed to the objective of the measure and the respective programmes.

45. The Commission realised that in the course of the programming period, Austria faced problems with implementation of the measures 224 and 225. In spite of constant encouragement, these measures failed to be successfully implemented. For this reason Austria approved projects aiming at the prevention of forestry potential also under M 226.

46. The Commission considers that based on the available knowledge on forest – climate interaction, the diversification of forests and introduction of various tree species may improve the resilience of forests against many disasters and fire and may also improve the climate change adaptability. These diversifications should be introduced before the disasters occur, based on expert opinions, forest protection plans and long-term forest or climate adaptation strategies.

47. Due to the fact that the increase of the frequency or strengths of extreme meteorological events is foreseen by the IPCC report⁷ the Commission considers that this measure is appropriate to provide prompt response to future calamities.

As regards beech wood, not only insects but also various funguses can damage the wood causing significant value losses and spreading the risk of pests and diseases to undamaged forests which is detrimental to previously healthy ecosystems.

The specific case identified by the Court will be examined by the Commission.

Box 3 – Examples of insufficient information or documentation related to the granting of support under measure 226

The situation has been remedied. In Aquitaine satellite images are now used for tracking the damaged areas. Every damaged plot is checked by an expert who verifies the scale of the damage before requesting the compensation. Then, the state services process the applications and conduct on the spot checks based on sampling before providing the compensation.

The Slovak authorities admitted an administrative error and informed the Commission that the relevant internal procedures had already been updated.

50. Forest roads may serve multiple purposes: facilitate the access in case of forest fires, provide access for preventive operations against fires, as well as extract wood and other forest products.

⁷ https://www.ipcc.ch/pdf/special-reports/srex/SREX_FD_SPM_final.pdf

The Commission is of the opinion that forest roads built for the purpose of fire prevention may also serve other purposes, provided that their original function is not hindered by an alternative use.

See also reply to point 51.

51. The use of forest roads for economic purposes does not compromise their role in forest fire prevention. Thinning and the removal of biomass is an important part of forest fire prevention measures. The roads are also used for wood transportation as part of the necessary preventive activities. Altogether the multiple use of these roads increases the cost-efficiency of the investment.

52. The use of forest roads for economic purposes may not compromise their capacity to serve forest disaster prevention purposes.

53. The Commission considers that due to the fact that local forests, bio-geographical, geological and ecological conditions vary significantly throughout the EU, setting up EU- level criteria concerning minimum requirements could be problematic. Such minimum requirements should be set at the most appropriate level.

Moreover, the creation of an appropriate network of forest roads will not only contribute to better protection of forests against fire, but also to a sustainable economic valuation of forest resources in many regions. This is often necessary to avoid complete loss of socio-economic interest of forest areas which may lead to their abandonment and ultimately also to an increased fire risk.

54. The Commission considers that the density of forest roads could be higher or lower depending on the local bio-geographical and geological conditions. Moreover, forest roads may serve several areas and holdings and it may happen that some sections of a forest road cover areas where there already is an appropriate level of road density. Within 2014-2020 RDPs, the Commission invited Slovak authorities to include, as one of the selection criteria, the road density in the area.

Box 5 – Examples of insufficient justification of the standard costs

Floating aid rates were not excluded in the past programming period. However, they are not allowed in the new programming period.

Example 2

See reply to point 57

57. The support for labour-intensive activities can be linked to the characteristics of the terrain (orography, environmental aspects etc.) and should be seen in a wider rural development context. The use of manpower could imply more eco-friendly methods and important socio-economic benefits which is also one of the objectives of rural development policy.

Box 6 – Example of a costly activity due to the use of manual labour

Costs' levels may vary due to various eco-geographical and geological conditions as well as other factors. There might also be reasons that make it impossible to use machinery altogether or to use more expensive machinery due to e.g. the existence of slopes, difficult access, environmental rules etc.

58. The Commission has invited Slovak authorities to include verification of the reasonableness of the costs within 2014-2020 RDPs.

60. In some areas there is a limited number of service providers for some specific tasks.

61. The Commission considers that the Managing Authorities are the responsible bodies to ensure the efficiency of the support at the project level.

Deadweight as such should be prevented by ensuring that the investment takes place only after the application for support or the granting of the support. Otherwise, the assessment of the deadweight might become quite subjective and lead to unequal treatment among applicants.

62. For the 2014-2020 period, in respect of investment projects, only expenditure which has been incurred after an application has been submitted by the beneficiary shall be eligible, according to Article 60(2) of Regulation 1305/2013. Member States can even impose a later moment in time such as the grant decision.

63. The Commission is of the opinion that the reply of the beneficiary would have to be further investigated to clarify under what conditions and how effectively such an investment would have been made and whether the original objective could have been achieved at all without the support through this measure.

64. Within certain limits, an "eligible hectare" for activating payment entitlements may contain some trees, shrubs or bushes.

The limitation of the excessive development of those trees, shrubs or bushes may reduce the risk of forest fires in the parcel in the surrounding forest zones.

Common reply to points 65 – 67:

The Commission considers that due to the fact that natural processes in forests are complex and that measurable effects of certain interventions may occur only after several years or decades, forest disaster prevention measures should be seen in a wider context of rural development and in a long-term time horizon. The Member States' forest inventories which could be repeated in 10-20 years and other forest monitoring programmes may provide information on the changes. Forestry measures are designed and implemented based on information and experiences gained through long lasting, 100-150 year-long forest management model experiences managed by Member States' forestry institutes and universities.

68. For the sake of proportionality, 2007-2013 CMEF included a set of common output indicators which ensure aggregation and comparison across RDP and which are designed to be relevant in a significant majority of cases. To illustrate specificities, additional indicators can be used by MS when appropriate.

The indicator 'area supported' for preventive action will be collected in the 2014-2020 CMES. This will fill in the gap identified in the 2007-2013 CMEF.

69. The observations demonstrate that, due to the complexity and an existing cross-connection of different actions, in many cases, it is not meaningful to break down the result indicators to a too detailed level. For this reason the Commission has chosen in the monitoring and evaluation framework for the 2014-2020 programming period to assess the results at the focus area level.

70. This indicator is one of the elements of the evaluation system. The new evaluation system should be considered globally.

71. The Commission has acknowledged that in the context of the RDPs, the mid-term evaluation had limited added value. Hence the requirement of doing a mid-term evaluation has been abolished for the programming period 2014-2020.

72. See replies to 69 and 71.

73. Although the average burnt area in the EU is not increasing, often yearly fire damages are concentrated in very few countries. These countries vary from year to year (e.g. Portugal & Spain 2003, Portugal 2005, Italy & Greece 2007, Spain 2012, etc.) Each year, extreme fire danger due to local hot and dry weather coupled with strong winds, may occur in specific regions. Specific

countries may thus face in given years extreme fire activity, driven by predominant meteorological fire danger conditions in areas of the Mediterranean basin or elsewhere in Europe.

At a Member State level, the observed differences in trends are often due to extreme fire danger conditions occurred at given years within the time series examined, as it is evident when analysing the data on a yearly basis against meteorological fire danger indicators.⁸

74. The Commission considers that there is a significant experience in relation to the nature of preventive measures including knowledge on their efficiency and effectiveness per programme area. A number of forest disaster prevention projects and programmes have been supported by EU funds and several studies and research projects have been conducted during the last 20 years.

CONCLUSIONS AND RECOMMENDATIONS

76. The Commission considers that in general forest disaster prevention measures successfully contributed to the objectives of the rural development programmes. Concrete results have been achieved and fewer occurrences of fire took place. Moreover, lessons have been learned which are applied in relation to the 2014-2020 period, especially as regards the scope of the measure and improved guidance.

78. The Rural Development Regulation⁹ provides that preventive actions against fires should cover areas classified by Member States as high and medium fire risk according to their protection plans. These forest protection plans and the Member States national or sub-national forest programmes or equivalent instruments provided appropriate base for targeting and prioritisation during selection.

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Recommendation 1

The Member States should:

Second indent: The Commission considers that Natura 2000 forests represent high environmental values and produce important and various ecosystem services. Furthermore, several Natura 2000 provisions apply to all forest across the EU, both within and outside Natura 2000 sites and in this respect, the role of forests outside Natura 2000 is also very relevant.

The Commission should:

First indent: The Commission is currently implementing the recommendation.

⁸ San-Miguel-Ayanz, J., Moreno, J.M., Camia, A. (2013) Analysis of large fires in European Mediterranean landscapes: Lessons learned and perspectives. *Forest Ecology and Management*, 294, pp. 11-22

⁹ Council Regulation (EC) No 1698/2005)

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Second indent: The Commission accepts the recommendation.

The Commission will examine with national competent authorities the possibility of the appropriate level of action in the field of common basic criteria to differentiate forest areas to be classified as low, medium and high fire risk.

79. As part of the sustainable forest management practices, forest roads (or other investments) built primarily for prevention purposes against fires can also be used for preventive actions against other risks as well as for the restoration and remedy works, recreation or economic purposes. The creation of an appropriate network of forest roads not only contributes to a better protection of forests against fire, but also to making sustainable economic valuation of forest resources in many regions. Often, these actions need to be done in order to avoid complete loss of socio-economic interest of forest areas which may lead to their abandonment and ultimately to an increased fire risk.

As regards the new programming period, guidance fiches have been prepared in order to ensure that the Member States / Regions use the measure correctly. Moreover, the Members States / Regions will have to specify their needs and reasons better, if they wish to expand the density of their road systems.

Recommendation 2

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First indent: The Commission considers that the new Rural Development Regulation includes a revised measure concerning forest protection and restoration. The new measure can provide support for actions related to prevention and restoration of damage to forests from forest fires and natural disasters and catastrophic events and may also provide support for preventive actions concerning pests and diseases under the condition that the risk of a relevant disaster occurrence is supported by scientific evidence and acknowledged by scientific public organisations.

Third indent: It is the Commission opinion that a number of environmental safeguards are already available with regard to the supported actions. For example in Natura 2000 the protection regime under Article 6.2 and 6.3 of Habitats Directive¹ guarantees that any significant deterioration of those areas is being avoided. In other areas environmental impact assessments will also contribute to preventing environmental counter-effects. Finally, for all actions to be co-financed by EU funds, a certificate of good environmental practice or sustainable forest management could be required from the competent national authorities as a pre-condition to EU co-financing.

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The attention of the Member States/Regions was drawn that in the event of uncertainties concerning the purpose of the actions, there are other measures specially targeted to increase the economic value of the forests.

80. Under the share management, the Commission adopts the national or regional RDPs, while the implementation and ensuring of the cost effectiveness and efficiency of the support are under the responsibility of the Member States and their Management Authorities.

As regards the use of manual work instead of machinery, sometimes such choices can be linked to the characteristics of the terrain (orography, environmental aspects etc.) and should be seen in a wider rural development context.

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First indent: The Commission considers that, when standard costs are applied in the programmes, the Member States/Regions shall ensure that the relevant calculations are adequate and accurate and established in advance in a fair, equitable and verifiable manner. An independent body should be designated to make the calculations for all the standard costs or to confirm the adequacy of the calculations.

Second indent: A guidance document on controls and penalties in rural development is being prepared and discussed with the Member States. The Annex I of this document contains a checklist for the Member States for the assessment of the reasonableness of the costs.

81. A careful balance needs to be made between the costs of the monitoring and evaluation and their potential benefits. Especially, in the case of measuring preventive actions it is difficult to establish the causality chain. Moreover, the effectiveness of particular forestry interventions can be assessed only after several years or even decades.

As regards the period 2014-2020, improvements have been introduced. For instance, a new 'area supported' indicator for preventive actions will be collected in the CMES. Moreover, in order to get valuable evaluation results, an enhanced Annual Implementation Report is foreseen in 2019. In the framework of this report, an evaluation of the RDP will be carried out and first results on the efficiency of the RDP will be provided.

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The Commission accepts the recommendation.

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