

## Article

# 25 Years of EU Forest Policy—An Analysis

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**Abstract:** A comparison between the most relevant forest-focused and forest-related EU policies from the time periods of the three EU forest(ry) strategies of 1998, 2013 and 2021 has revealed an overall rise in the number of forest-related policies that is mainly rooted in the environmental policy sector. Next to the increasing number of policies, a growing preference for regulations over directives as policy instruments was identified. New policy fields that have gained increasing importance over the last 25 years, most prominently climate, energy and bioeconomy policy, create and define additional demands on forests through their cross-cutting relations with other policy sectors. At the same time, multi-issue strategies that have recently been employed by the European Commission might turn out to be unable to solve the trade-offs that are produced by opposing policy goals.

**Keywords:** EU policy instruments; forest policy; forest-focused policies; forest-related policies; cross-sectoral policies

## 1. Introduction

Similar to the 1980s, when forest dieback was a major political concern across Europe, forests nowadays are gaining increasing visibility in the environmental debate and so is forest policy in the European Union (EU). Discussion has often revolved around the debate about whether or not there is a common EU forest policy and its level of fragmentation. Recent research has shown that there is a de facto EU forest policy, which is reflected in a variety of different sectoral policies [1,2]. Surprisingly, the question of a de jure forest policy seems to be still ambiguous. It has been a widespread opinion among EU member countries and some forest stakeholder organisations that a Union competence to rule on forestry issues is not anchored in the founding treaties [3,4]. Yet, with the forestry topic shifting from forest production to environmental priorities in the EU Green Deal and the new EU Forest Strategy 2030, there are arguments that forests are environmental assets that fall under the competence of the EU addressed by the treaties [5,6].

Indeed, while forest-focused policies, i.e., directly addressing the forestry domain and mainly involving forestry actors, mostly remain of a legally non-binding character, there is a great number of forest-related legally binding Union policy instruments (“hard law”) that have a direct influence on Member State (MS) forests (e.g., climate, energy, trade). The difference between forest-focused and forest-related policies is highlighted in Pülzl et al., 2013: “the former primarily address forests or forest management, with the motivation often, but not necessarily, stemming from the forest sector; the latter address forests and forest management but strive to achieve policy goals stemming from other policy domains,



Received: 6 December 2024

Revised: 22 January 2025

Accepted: 24 January 2025

Published: 30 January 2025

**Citation:** Gordeeva, E.; Wolfslehner, B.; Weber, N. 25 Years of EU Forest Policy—An Analysis. *Forests* **2025**, *16*, 256. <https://doi.org/10.3390/f16020256>

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such as rural development, nature conservation, renewable energy and climate policy” [7] (p. 11). This is further discussed in Weber, 2017 [8].

Environmental policy is an area of shared competences between the EU and the Member States. This means that all policies conducted within this domain are to follow the principles of conferral (under the principle of conferral, the Union shall act only within the limits of the competences conferred upon it by the Member States in the Treaties to attain the objectives set out therein. Competences not conferred upon the Union in the Treaties remain with the Member States), subsidiarity (under the principle of subsidiarity, in areas which do not fall within its exclusive competence, the Union shall act only if and in so far as the objectives of the proposed action cannot be sufficiently achieved by the Member States, either at central level or at regional and local level, but can rather, by reason of the scale or effects of the proposed action, be better achieved at Union level) and proportionality (under the principle of proportionality, the content and form of Union action shall not exceed what is necessary to achieve the objectives of the Treaties) (Art. 5 TEU). Yet, throughout the last decades, the number of forest-related policies seems to have experienced significant growth in both number and scope. By scope, we mean the choice of policy instrument that appears to have shifted from directives to regulations, which bind the MSs with regard to both substance and manner of implementation [9].

Given this observation, this work attempts to identify all relevant forest-focused and forest-related EU policies that have been adopted during three periods of time echoing the publication of the three EU forest(ry) Strategies of 1998, 2013 and 2021 with the aim of verifying whether an increase in the number of EU forest-related policies can be confirmed and whether regulations are becoming a preferred instrument of EU forest-related policy. The findings are discussed in light of possible effects on policy goal achievement and considerations of legitimacy. For this purpose, the work is divided into an analytical and an interpretational part, with a synoptic conclusion.

## 2. Materials and Methods

### 2.1. EU Forest Policy—An Overview

EU forest policy in its current form is a patchwork of different legally binding and non-binding policy instruments. Its core is addressed by the Forest Strategy 2021, which has the legal form of a Commission’s Communication. The Strategy constitutes a legally non-binding multi-sectoral strategic framework accompanied by references to other, often legally binding policies from related policy sectors. Among these sectors, the most relevant ones are the environment (including biodiversity as a separate policy domain) and agriculture. In recent years, the sectors of climate and energy policy have emerged in the forest-related political arena, while trade has been there since the beginning of the new millennium.

All areas of forest-related EU policies lie within former pillar I of the Maastricht Treaty 1992 (European Communities) and constitute an area of shared competences. This means that on the level of the EU, the policies are adopted under the ordinary legislative procedure, while both the EU and the Member States can legislate and adopt legally binding acts. The power to initiate EU policy lies with the Commission. In exercising its competences, the European Union needs to follow the principles of conferral, subsidiarity and proportionality. Even though the European Commission might be considered a unitary actor, it in fact consists of several departments, the so-called Directorates-Generals (DGs) with their respective areas of responsibility as well as a Secretariat-General that is in charge of internal coherence. All three Forest Strategies were created under the responsibility of the Directorate-General for Agriculture and Rural Development (DG AGRI).

Next to the Forest(ry) Strategies, Tables 1a, 2a and 3a highlight other strategies that we consider as having a high relevance for forests. They are differentiated by legal form

and DG that was responsible for its creation, which are displayed in the tables by means of different codes (see legend for Tables 1a, 2a and 3a). Forest-related instruments, in turn, are listed in Tables 1b, 2b and 3b. Here, a code indicates the policy area: agriculture, forestry, environment, energy, climate and trade. The shading indicates the legal form of the instrument: regulation, directive or decision (see legend for Tables 1b, 2b and 3b).

**Table 1.** (a) Major (forest-related) strategies and programmes, 1998. (b) Major (forest-related) policy instruments, 1998.

(a)			
Forest-Related Strategy		Legal Form	Forest-Related Measure
DG			
EU Forestry Strategy 1998	AGRI	Communication COM(1998) 649 final	Ensuring a good structure and competitiveness of EU forest industry Sustainable Forest Management
A European Community Biodiversity Strategy	ENVI	Communication COM(1998) 42 final	Conservation and sustainable use of biological diversity, incl. avoidance of genetic erosion in forestry Fully implement Natura 2000 network under Habitats and Birds Directives Forests as part of a natural landscape Forests: several measures under policy area 5
5th Environmental Action Programme		Council Resolution 93/C 138/01	Forest as part of the agricultural sector. Main objectives: - protect forest heritage against threat from acidification and fire; - improve the productivity of forests; - develop forest and forest-related activities, especially in rural areas; - promote afforestation on agricultural land
Common Agricultural Policy (CAP)	AGRI	Based on Regulations: No. 10934/97 No. 13380/97 No. 13111/97 No. 5102/98 No. 5733/98 No. 5939/98 ADD 1, 2 and 3 No. 6752/98 No. 7072/98 (According to: UK Parliament website, 1998 [10])	With regard to forestry: Forestry products as main focus, but also afforestation payment schemes described
Climate Change-towards an EU Post-Kyoto Strategy	ENVI	Communication COM(1998) 353 final	Forests as sinks for CO <sub>2</sub>
(b)			
Forest-Related Instrument		Legal Form	Forest-Related Measure
Domain			
Forestry measures in agriculture	AGR	Council Regulation (EEC) No 2080/92 (no longer in force)	Afforestation as major focus
The scheme to develop and optimally utilise woodlands in rural areas	AGR	COUNCIL REGULATION (EEC) No 1610/89 (no longer in force)	Includes a wide range of forestry measures to promote the economic, ecological and social functions of forests as part of the operational programmes

Table 1. Cont.

Forest-Related Instrument	Domain	Legal Form	Forest-Related Measure
Improving the processing and marketing conditions for forestry products	FOR	COUNCIL REGULATION (EEC) No 867/90 (no longer in force)	Development and rationalization of the marketing and processing of wood Investments relating to all working operations prior to the industrial sawing of wood at a sawing mill. Investments preferably for small and medium-sized undertakings with the aim of contributing to the economic development of the agricultural and rural environment
The Community Scheme for the Protection of Forests against Atmospheric Pollution	FOR	COUNCIL REGULATION (EEC) No 3528/86 (no longer in force)	Establishes a periodic inventory of damage caused to forests on the basis of common methods, in particular by atmospheric pollution Obligation for Member States to create a unitary-form report on forest health based on the above-mentioned inventory Research on atmospheric pollution in forests Committee on forest protection is set up Commission regulation (EC) No 1091/94 lays down rules for implementation
Protection of the Community's forests against fire	FOR	COUNCIL REGULATION (EEC) No 2158/9 (no longer in force)	Aims to reduce the number of forest fires outbreaks and reduce the extent of areas burned
EU Habitats Directive	ENV	Council directive 92/43/EEC	Reporting obligation under Art. 17 Conservation measures under Art. 6 Habitat types: Annex I Species: Annex II Natura 2000 network
Birds Directive	ENV	Council directive 79/409/EEC (no longer in force)	Regulations on conservation in, among other habitats, forests
Promotion of renewable energy sources (Altener Programme)	ENE	Council decision 93/500/EEC (no longer in force)	Biomass as renewable energy source, forests not mentioned specifically
Supplement to 5th EAP	AGR	DECISION 2179/98/EC	Forest-related priorities in relation to agriculture
Environmental Impact Assessment Directive	ENV	Council directive 85/337/EEC (no longer in force)	Afforestation in agriculture as project subject
Freedom of access to information on the environment	ENV	Council directive 90/313/EEC (no longer in force)	Ensures freedom of access to environmental information, forests not mentioned specifically

Table 1. Cont.

Forest-Related Instrument	Domain	Legal Form	Forest-Related Measure
European Forestry Information and Communication System (Efics)	FOR	Council regulation 1100/98 (no longer in force)	Improving the quality of national forest inventories, esp. with regard to comparable pan-European criteria Make efforts to investigate potential of GIS techniques Obtaining information and achieving better communication by setting up an EU database containing all relevant information about Community measures relating to forestry as well as basic information on Member States' national or subnational forest policies and programmes Carry out information gathering and analysis of the future development of the forestry sector with respect to trade, industry, employment and environmental issues.
Monitoring Community CO <sub>2</sub>	CLI	Council Decision 93/389/EEC (no longer in force)	References the Kyoto Protocol, forests not specifically mentioned
Committees		Council Decision 89/367/EEC	Council Decision 89/367/EEC sets up the Standing Forestry Committee
		Council Decision 98/235/EC (no longer in force)	Sets up advisory committees on forests, including cork—Council Decision 98/235/EC
		Council Decision 97/837/EC	Sets up advisory committees on forestry and forest-based industry—Council Decision 97/837/EC
Forest Propagation Material	AGR	COUNCIL DIRECTIVE 70/458/EEC (no longer in force)	In order to facilitate implementation of the proposed measures, a procedure should be provided for establishing close co-operation between Member States and the Commission within the Standing Committee on Seeds and Propagating Material for Agriculture, Horticulture and Forestry set up by the Council Decision of 14 June 1966

Table 2. (a) Major (forest-related) strategies and programmes in 2013. (b) Major (forest-related) policy instruments in 2013.

(a)			
Forest-Related Strategy	DG	Legal Form	Forest-Related Measure
EU Forest Strategy 2013	AGRI	Communication COM(2013) 659 final	Sustainable forest management Forests to contribute to bioeconomy Cascade principle
EU 2020 Biodiversity Strategy	ENVI	Communication COM(2011) 244 final	Introducing Forest Management Plans in line with Sustainable Forest Management for all forests that are publicly owned and for forest holdings above a certain size that receive funding under the EU Rural Development Policy Integrate biodiversity into forest management plans

Table 2. Cont.

Forest-Related Strategy		Legal Form	Forest-Related Measure
DG			
7th Environmental Action Programme		Decision No 1386/2013/EU	Priority objectives: <ul style="list-style-type: none"> <li>- Multi-functional forests</li> <li>- Forests as part of CAP and LULUCF</li> <li>- Forest management is sustainable, and forests, their biodiversity and the services they provide are protected and, as far as feasible, enhanced and the resilience of forests to climate change, fires, storms, pests and diseases is improved</li> </ul>
Common Agricultural Policy (CAP)	AGRI	Based on several regulations, forests/woodland addressed in: REGULATION (EU) No 1306/2013 REGULATION (EU) No 1307/2013 REGULATION (EU) No 1305/2013	Focus areas: <ul style="list-style-type: none"> <li>- Monitoring of land under agroforestry</li> <li>- Biodiversity and afforestation</li> <li>- Ecological focus areas in agriculture</li> <li>- Funding for forestry through Rural Development Fund</li> </ul>
Bioeconomy Strategy 2012	RTD	Staff working document	Forestry as one of the sources for primary production (incl. biomass for refineries) Forests as a means for carbon sequestration Jobs in forestry Forest-related research priorities under Horizon 2020
An EU Strategy on adaptation to climate change	NI	Communication COM(2013) 216 final	Providing funding to support capacity building and step up adaptation: forestry and tourism sector and desertification and forest fires as vulnerable areas
(b)			
Forest-Related Instrument		Legal Form	Forest-Related Measure
Domain			
Support through rural development fund	AGR	REGULATION (EU) No 1306/2013 & REGULATION (EU) No 1305/2013	Afforestation and creation of woodland
Rules for direct payments for farmers	AGR	REGULATION (EU) No 1307/2013	Ecological focus-areas in agriculture: afforestation or agro-forestry
EU Habitats Directive	ENV	Council directive 92/43/EEC	Reporting obligation under Art. 17 Conservation measures under Art. 6 Habitat types: Annex I Species: Annex II Natura 2000 network
Birds Directive	ENV	DIRECTIVE 2009/147/EC	Regulations on conservation in, among other habitats, forests Natura 2000 network

Table 2. Cont.

Forest-Related Instrument		Legal Form	Forest-Related Measure
Domain			
Environmental Liability Directive	ENV	DIRECTIVE 2004/35/CE	Prevention and remediation of environmental damage involving forest habitats (see Commission Guidelines on a common understanding of environmental damage under the Environmental Liability Directive (C(2021)1860 final), in particular paragraphs 15, 18 and 90)
Environmental Crime Directive	ENV	DIRECTIVE 2008/99/EC	Criminalises certain conduct that involves damage to protected forests (Art. 3h)
Strategic Impact Assessment Directive	ENV	DIRECTIVE 2001/42/EC	Art. 3.2.a An environmental assessment shall be carried out for all plans and programmes, incl. forestry
Environmental Impact Assessment Directive	ENV	Directive 2011/92/EU	Plans and programmes on the environment, links through Strategic Impact Assessment Directive
Freedom of access to information on the environment	ENV	Directive 2003/4/EC	Right to access to environmental information held by or for public authorities, incl. forestry
EU Timber Regulation	TRA	REGULATION (EU) No 995/2010	Outlines the obligations of operators who place timber and timber products on the market to counter the trade of illegally harvested timber and timber products. Linkages with FLEGT
Forest Law Enforcement Governance and Trade Regulation (FLEGT)	TRA	COUNCIL REGULATION (EC) No 2173/2005	Establishes a Community set of rules for the import of certain timber products for the purposes of implementing the FLEGT licensing scheme aimed at combating illegal logging and related trade
Renewable Energy Directive I (RED I)	ENE	DIRECTIVE 2009/28/EC (no longer in force)	Forest biomass as source of energy; definition of forest biomass; Member States to adopt National renewable energy action plans
LULUCF	CLI	REGULATION (EU) No 525/2013 (no longer in force)	Mechanism for monitoring and reporting greenhouse gas emissions and for reporting other information at the national and Union level relevant to climate change
		DECISION No 529/2013/EU	Accounting rules on greenhouse gas emissions and removals
Invasive species regulation	AGR	Regulation (EU) 1143/2014	Information on the species considered invasive, the spread of these species, surveillance system, measures to inform the public about the presence of such species, permits relating to species considered to be invasive
Forest Propagation Material	AGR	COUNCIL DIRECTIVE 2002/55/EC	The Commission shall be assisted by the Standing Committee on Seeds and Propagating Material for Agriculture, Horticulture and Forestry set up by Article 1 of Council Decision 66/399/EEC
Marketing of forest reproductive material	AGR	COUNCIL DIRECTIVE 1999/105/EC	Regulates the marketing and the production for marketing purposes of forest reproductive material within the EU

**Table 3.** (a) Major (forest-related) strategies and programmes in 2023. (b) Major (forest-related) policy instruments in 2023.

			(a)
Forest-Related Strategy		Legal Form	Forest-Related Measure
DG			
EU Forest Strategy for 2030	AGRI	Communication COM(2021) 572 final	Bioeconomy and bioenergy, cascade principle and circular economy Forest conservation Monitoring, reporting and data collection Forest-related research and innovation Re-structuring of EU forest governance framework Several references to legally binding documents
EU Biodiversity Strategy for 2030	ENVI	Communication COM(2020) 380 final	An overall target to protect at least 30% of the EU land area under effective management regime, out of which 10% of the EU land should be put under strict legal protection. Forest ecosystems are meant to contribute to this target, esp. in relation to primary and old-growth forests Proposes the Nature Restoration Law Sets out a pledge to plant at least 3 billion additional trees by 2030 The share of forest areas covered by forest management plans (FMPs) should cover all managed public forests and an increased number of private forests
The European Green Deal	SG	Communication COM(2019) 640 final	Commission will promote forest-related interventions in the future CAP (2023–2027) in relation to the European Green Deal objectives: in particular the set-up of ecosystem services payment schemes and roll-out of carbon farming practices, and in other EU financial instruments (e.g., Cohesion Policy, LIFE, Horizon Europe, EU cross-border cooperation programs (Interreg)) Intends to strengthen the Environmental Crime Directive
8th Environmental Action Programme		Decision COM(2020) 652 final	Article 2.2: Priority objectives: (a) Enhancement of the removal of greenhouse gases by natural sinks (b) Reduction of the vulnerability of the environment towards climate change (c) Transition towards circular economy (d) Protecting, preserving and restoring biodiversity (e) Promoting environmental aspects of sustainability in, e.g., buildings
Common Agricultural Policy (CAP)/New CAP 2023–27	AGRI	Regulation (EU) 2021/2115 Regulation (EU) 2021/2116 Regulation (EU) 2021/2117	Strategic plans for the Member States Payment schemes under the new CAP Horizontal regulation



Table 3. Cont.

Forest-Related Strategy		Legal Form	Forest-Related Measure
DG			
Bioeconomy Strategy	RTD	Communication COM(2018) 673 final	Forestry as part of five objectives of Strategy: ensuring food and nutrition security; managing natural resources sustainably; reducing dependence on non-renewable, unsustainable resources whether sourced domestically or from abroad; mitigating and adapting to climate change; strengthening European competitiveness and creating jobs
2030 Climate Target Plan	CLIMA	Communication COM/2020/562 final	Forests as carbon sinks and sources of energy production
2030 Climate and Energy Framework	NI	Communication COM/2014/015 final	Sustainable forest management; forests as producers of biomass
(b)			
Forest-Related Instrument		Legal Form	Forest-Related Measure
Domain			
Nature Restoration Law	ENV	Regulation COM(2022) 304 final (proposal for a from 22 June 2022)	Links to New Forest Strategy for 2030, the Biodiversity Strategy for 2030, the Habitats Directive and the Birds Directive Article 10 Restoration of forest ecosystems: Member States shall put in place the restoration measures necessary to enhance biodiversity of forest ecosystems, in addition to the areas that are subject to restoration measures pursuant to Article 4(1), (2) and (3). Member States shall achieve an increasing trend at national level of each of the following indicators in forest ecosystems, as further set out in Annex VI, measured in the period from the date of entry into force of this Regulation until 31 December 2030, and every three years thereafter, until the satisfactory levels identified in accordance with Article 11(3) are reached: (a) standing deadwood; (b) lying deadwood; (c) share of forests with uneven-aged structure; (d) forest connectivity; (e) common forest bird index; (f) stock of organic carbon.
CAP Strategic Plans	AGR	Regulation (EU) No 2021/2115	Member State obligation to create CAP Strategic Plans
CAP horizontal regulation	AGR	Regulation (EU) 2021/2116	Art. 25(b): monitoring of agricultural land—agro-forestry Art. 84: With regard to forest areas, however, the administrative penalties referred to in the first subparagraph shall not apply where no support is claimed for the area concerned in accordance with Articles 70 and 71 of Regulation (EU) 2021/2115

Table 3. Cont.

Forest-Related Instrument		Legal Form	Forest-Related Measure
Domain			
EU Habitats Directive	ENV	Council directive 92/43/EEC	Reporting obligation under Art. 17 Conservation measures under Art. 6 Habitat types: Annex I Species: Annex II Natura 2000 network
Birds Directive	ENV	DIRECTIVE 2009/147/EC	Regulations on conservation in, among other habitats, forests Natura 2000 network
Taxonomy Regulation	ENV/ TRA	REGULATION (EU) 2020/852	Establishes criteria for determining whether an economic activity qualifies as environmentally friendly for the purposes of establishing the degree to which an investment is environmentally friendly Forest-related aim: contribution to climate change mitigation and the protection and restoration of biodiversity and ecosystems
Environmental Liability Directive	ENV	DIRECTIVE 2004/35/CE	Prevention and remediation of environmental damage involving forest habitats (see Commission Guidelines on a common understanding of environmental damage under the Environmental Liability Directive (C(2021)1860 final), in particular paragraphs 15, 18 and 90)
Environmental Crime Directive	ENV	DIRECTIVE 2008/99/EC	Criminalises certain conduct that involves damage to protected forests (Art. 3h)
Strategic Impact Assessment Directive	ENV	DIRECTIVE 2001/42/EC	An environmental assessment shall be carried out for all plans and programmes, incl. forestry
Environmental Impact Assessment Directive	ENV	DIRECTIVE 2014/52/EU	Plans and programmes on the environment, links through Strategic Impact Assessment Directive
Freedom of access to information on the environment	ENV	Directive 2003/4/EC	Right to access to environmental information held by or for public authorities, incl. forestry
Forest Law Enforcement Governance and Trade Regulation (FLEGT)	TRA	COUNCIL REGULATION (EC) No 2173/2005	Establishes a Community set of rules for the import of certain timber products for the purposes of implementing the FLEGT licensing scheme aimed at combating illegal logging and related trade
Renewable Energy Directive II (RED II)	ENE	DIRECTIVE (EU) 2018/2001	Reporting obligations in form of National Energy and Climate Plans; definition of forest biomass

Table 3. Cont.

Forest-Related Instrument		Legal Form	Forest-Related Measure
Domain			
LULUCF	CLI	REGULATION (EU) 2018/841	Sets out the commitments of Member States for the land use, land use change and forestry (LULUCF) sector that contribute to achieving the objectives of the Paris Agreement and meeting the greenhouse gas emission reduction target of the Union for the period from 2021 to 2030. Lays down the rules for the accounting of emissions and removals from LULUCF and for checking the compliance of Member States with those commitments: National Forestry Accounting Plans
Governance of the Energy Union	ENE	REGULATION (EU) 2018/1999	Obligation for MSs to create 10 year NECPs (National Energy and Climate plans); forests as biomass (definition in Red II)
Climate Action	CLI		
Forest Accounts	FOR	COM(2022) 329 final, Proposal for a Regulation from 11.07.2022	Several reporting requirements
European Deforestation Regulation (EUDR)	TRA	REGULATION (EU) 2023/1115, repealing Regulation (EU) No 995/2010	Operators are required to collect the geographic coordinates of the land where the commodities they place on the EU market were produced. This strict traceability is meant to ensure that only deforestation-free products (according to the laws of the country of origin) enter the EU market—and that enforcement authorities in Member States have the necessary means to control that this is the case (Commission website). Linkages with FLEGT; repeals EU Timber Regulation
Invasive species regulation	AGR	Regulation (EU) 1143/2014	Information on the species considered invasive, the spread of these species, surveillance system, measures to inform the public about the presence of such species, permits relating to species considered to be invasive
Forest Propagation Material	AGR	COUNCIL DIRECTIVE 2002/55/EC	The Commission shall be assisted by the Standing Committee on Seeds and Propagating Material for Agriculture, Horticulture and Forestry set up by Article 1 of Council Decision 66/399/EEC
Marketing of forest reproductive material	AGR	COUNCIL DIRECTIVE 1999/105/EC	Regulates the marketing and the production for marketing purposes of forest reproductive material within the EU

Decisions are binding in their entirety. In case a decision has an addressee (since the Lisbon Treaty, a decision does not necessarily need to have one)—e.g., one or several Member States, a specific company—it applies only to those to whom it is addressed. Regulations are the strictest form of EU policy and apply to all Member States directly upon being published in the official journal in both substance and manner. Directives are also legally binding to all Member States, yet only regarding substance, since the manner of implementation is free [9].

## 2.2. Material Selection and Analysis

To achieve the goals of this analysis, three sets of documents were created and analysed. The core of each set is constituted by one of the three EU Forest(ry) Strategies of 1998, 2013 and 2021, around which all related strategies and policy instruments that were considered relevant to the purpose of this analysis were grouped. The selected document sets were compiled, and each document was analysed with regard to its content, legal and technical characteristics. The document analysis was carried out by the authors without making use of any computer-aided evaluation software. The relevance of the documents was determined by whether or not forests are mentioned in the policy documents and/or are directly affected by them. The documents needed to be official legal acts representing pieces of European Union policy. The documents were selected using a snowballing system, starting with the policies mentioned in the Forest Strategies, as well as expert knowledge of the authors. The major tool for the document search applied was EUR-Lex (<https://eur-lex.europa.eu/homepage.html>). Given the exploratory character of this analysis, it might be the case that certain documents were not included in the compilation. The authors are aware of the presence of a considerable number of soft policies as well as other provisions that affect the forests of the EU's Member States. However, to keep the dataset manageable, those instruments were not included in the analysis.

## 3. Analysis and Results

Comparing the framework of forest-related policies that were in force in 1998 (Table 1a,b) with those of the years 2013 (Table 2a,b) and 2023 (Table 3a,b), a number of observations can be made. There has, indeed, been an increase in the overall amount of forest-related strategies and instruments. The number of strategies that are relevant for MS forest policies has doubled since 1998. The overall number of forest-related instruments has increased from 14 in 1998 to 20 in 2023, and the number of environmental instruments has experienced a significant increase from 4 instruments in 1998 to 9 instruments in 2023 (Table 4).

**Table 4.** Overview of forest-related policies per year.

Year	Strategies	Instruments	Of These: Environmental Policy Instruments
1998	4	14 (Legislation on the establishment of Committees is left out from the counting)	4
2013	6	16	7
2023	8	20 (1 proposal)	9 (Taxonomy regulation not unequivocally environmental)

Legend for Tables 1a, 2a and 3a:

DG Agriculture	AGRI
DG Environment	ENVI
DG Research and Innovation	RTD
DG Climate	CLIMA
Secretariat-General	SG
DG not identified	NI

## Legend for Tables 1b, 2b and 3b:

Domain (1st column to the left)	
Agriculture	AGR
Environment	ENV
Forestry	FOR
Energy	ENE
Climate	CLI
Trade	TRA
Legal form (middle column)	
Regulation	
Decision	
Directive	

In 1998, next to the forest-focused Forestry Strategy [11], forests were subject of the Biodiversity Strategy [12], the Common Agricultural Policy (CAP) (based on several regulations) and the Climate Strategy [13]. The 5th Environmental Action Programme was in force in the form of a Council Resolution [14], which is non-legally binding. In 2013, the Forest Strategy [15] was accompanied by the Biodiversity Strategy [16], the CAP (forests addressed in REGULATION (EU) No 1306/2013, REGULATION (EU) No 1307/2013 and REGULATION (EU) No 1305/2013) and the Climate Strategy [17]. A bioeconomy strategy in the form of a staff working document of the European Commission has made its way to the EU forest policy complex, while the 7th Environmental Action Programme has evolved to become legally binding in the form of a Decision [18]. In 2023, the Forest Strategy [19] was complemented by even more policies. Next to the Biodiversity Strategy [20] and the CAP (Regulation (EU) 2021/2115, Regulation (EU) 2021/2116 and Regulation (EU) 2021/2117), the Climate Strategy was divided into two parts: the Climate Target Plan [21] and the Climate and Energy Framework [22]. The Bioeconomy Strategy has gained form to evolve into a Commission's Communication [23]. A new, multi-sectoral and multi-issue strategy has emerged—the Green Deal [24].

Out of the 9 environmental instruments we observe in 2013, 4 instruments from 1998 are repeated in both the 2013 and the 2023 strategies—EU Habitats Directive [25], EU Birds Directive [26], Environmental Impact Assessment Directive [27]—amended since 1998, and the Freedom of access on information on the Environment Directive [28], also amended since 1998. New environmental policies that appear on our list in 2013 (Table 3b) are the Environmental Liability Directive [29], Environmental Crime Directive [30] and the Strategic Impact Assessment Directive [31]—all these directives are in force today.

The two new environmental instruments that can be found on the 2023 list (Table 4) have the form of a regulation. These instruments are the Taxonomy Regulation [32], a regulation that cannot be unequivocally assigned to the environmental domain due to its strong connection with finance, and the Nature Restoration Law [33] (adopted by EU Parliament on 27 February 2024, final document not yet available, but the proposal for a regulation from 22 June 2022). The Taxonomy Regulation establishes criteria for determining whether an economic activity qualifies as environmentally friendly for the purpose of environmentally friendly investment. The forest-related aim of this policy is to contribute to climate change mitigation and the protection and restoration of biodiversity and ecosystems. The Nature Restoration Law is a multi-issue legally binding instrument that links the non-legally binding New Forest Strategy for 2030 and the Biodiversity Strategy for 2030

to the legally binding Habitats Directive and the Birds Directive. These cross-linkages to other policies and a high degree of centralization that result from the chosen legal form of a regulation differentiate the Nature Restoration Law from its environmental predecessors, which all dealt with one specific issue and had the legal form of a directive.

Another observation relevant for discussion is the availability of forest-focused instruments in 1998: the regulation on improving the processing and marketing conditions for forestry products [34], which deals with investments relating to the operations of felling, dismembering, stripping, cutting up, storage, protective treatment and drying of indigenous woods and to all working operations prior to the industrial sawing of wood at a sawmill; the regulation on forest fires [35]; the Community Scheme for the Protection of Forests against Atmospheric Pollution [36] on the obligation to create periodic inventories on forest health using common methods and the European Forestry Information and Communication System (EFICS) [37] aimed at improving the quality of national forest inventories and investigating the potential of GIS techniques. All these instruments have the form of a regulation, which is common for policy outcomes in the agricultural sector, where many of the forest policy initiatives have been subsumed.

In 2013, no forest-focused instruments could be identified (Table 3b), but there were three new environmental instruments as well as two trade-focused instruments—the Timber Regulation [38] outlining the obligations of operators for placing timber and timber products on the EU market, as well as the related FLEGT [39] establishing rules for the import of certain timber products for the purposes of implementing the FLEGT licensing scheme aimed at combating illegal logging and related trade. An important tool of the FLEGT is the Voluntary Partnership Agreements (VPA), which are concluded between the EU and a third country to ensure the legality of imported timber. Legality in that case is determined by compliance with the laws of the exporting country.

Climate and energy policy also began to play an important role in EU forest-related policy as of 2013. The Renewable Energy Directive (RED) I [40] identifies forest biomass as a source of energy and obliges the MSs to adopt National renewable energy action plans. In contrast, in 1998, the Altener Programme [41] identified biomass as a source of energy, while forests were not specifically mentioned. It has evolved into RED II [42], where the use of bioenergy from primary sources is seen as more critical and subject to sustainability criteria.

The land use, land use change and forestry (LULUCF) regulation included in the 2013 list (Table 3b) consists of a mechanism for monitoring and reporting greenhouse gas emissions and for reporting other information at national and Union level relevant to climate change [43] and a decision determining accounting rules on greenhouse gas emissions and removals [44]. In 1998, CO<sub>2</sub> emissions in the European Community were monitored by means of Council Decision 93/389/EEC, which referenced the Kyoto protocol. Here, however, forests were not specifically mentioned. The LULUCF regulation was amended by its later version [45], which determines the commitments of the Member States for the LULUCF sector that contribute to achieving the objectives of the Paris Agreement and would meet the greenhouse gas emission reduction target of the Union for the period from 2021 to 2030. This regulation also lays down the rules for the accounting of emissions and removals from LULUCF and for checking the compliance of Member States with those commitments by means of National Forestry Accounting Plans. The Governance of the Energy Union and Climate Action [46]—a newcomer to this topic—obliges the Member States to create 10-year National Energy and Climate Plans (NECPs) and creates a joint policy of energy and climate issues.

In 2023, a forest-focused reporting requirement comes back into the legal framework of EU forest-related policy—the COM(2022) 329 final, currently still in the form of a proposal

for a regulation. The European Deforestation Regulation (EUDR) [47] entered into force in 2023, eventually repealing the EU Timber Regulation and addressing deforestation caused by the production of six further commodities, e.g., coffee and cocoa. Initially, its application was planned at the end of 2024. However, due to concerns from EU and non-EU Member States, producers and industry, the EU parliament and the Council agreed to postpone the requirement to fulfil the new regulation by one year. The EUDR arose from the EU Commission's perception that the proof of legality of timber that is placed on the European market, as was foreseen in the Timber Regulation, was not enough to address the problem of deforestation. Therefore, the new instrument sought to add the requirement of the producers to provide geo-localization data as a proof of deforestation-free origins of the commodities placed on the EU market as well as the requirement of the operators to provide a due diligence statement consisting of a considerable number of documents (Art. 3; Art. 8, Art. 9).

#### 4. Discussion

As follows from the comparison of forest-focused and forest-related legal acts 1998, 2013 and 2023, an overall increase in the number of forest-related strategies and instruments can be observed. Among the new policy areas (in relation to 1998) are climate, energy and bioeconomy as well as trade. The number of environmental forest-related instruments has doubled since 1998. The overall focus in forest-related policy has shifted from a resource-perspective to a more holistic view on forests, including their ecological value. This shift is mirrored in the name of the strategies, which changed from Forestry Strategy in 1998 to Forest Strategy for the ones that followed.

The newcomer strategies of the latest forest policy setting (Table 3a), most strikingly driven by the European Green Deal, are of a multi-sectoral and multi-issue nature. The fact that the Green Deal was coordinated by the Secretariat-General of the EU Commission confirms its aspiration to produce cross-sectoral policies, as well as the importance the Commission attributes to it. Indeed, finding new approaches to environmental regulation has been on the Commission's table since the late 1990s [48]. Among the key ideas in this regard were cross-sectoral strategies [49] and soft policy instruments combined with market-based instruments [50] that would better address the problems of legitimacy of the EU (e.g., [51] or see [52] for further discussion on that matter) resulting from democratic deficit. Following Beetham and Lord, 1998: "Political authority is legitimate [53] to the extent that: 1 It is acquired and exercised according to established rules (legality); 2 The rules are justifiable according to socially accepted beliefs about (i) the rightful source of authority, and (ii) the proper ends and standards of government (normative justifiability); 3 positions of authority are confirmed by the express consent or affirmation of appropriate subordinates, and by recognition from other legitimate authorities (legitimation)" ([53], p. 3). As summarized by Eriksen and Fossum, 2002: "[54] suffers from deficiencies in representation, representativeness, accountability, transparency and support. The problem is not merely that of the establishment of an additional layer of governance, further removed from the peoples of Europe. It is also that this process contributes to the transformation of the Member States, so that each Member State can no longer claim to be the source of its own legitimacy (Beetham and Lord, 1998" ([53], p. 401).

Yet, despite initial enthusiasm and obvious advantages in terms of legitimacy, those so-called "New Modes of Governance" were either applied to a minor extent [50] or remained on the level of rhetoric, as in relation to the Environmental Action Programmes (EAP) [48]. The latter became more regulatory over the years to evolve into legally binding pieces of policy as of the 7th EAP. However, cross-sectoral, vaguely formulated strategies did become more prominent and seemed to have evolved into a new standard of praxis in

environmental policy. According to de Sadeleer, 2012, “subsidiarity signals a shift away from detailed harmonization and towards a more flexible regulatory style characterized by vague objectives leaving ample room for manoeuvre” ([55], p. 66). A cross-sectoral [56] and multi-level [57] style of policy strategies appeared as a promising way forward to incorporate the different pillars of the sustainable development concept into one policy and increase horizontal and vertical coherence as a result.

Yet, practice has proven that those integrated strategies have not been able to produce satisfactory results as governance processes beyond a rhetorical meaning [49], including for forest policy [58]. According to Nordbeck and Steurer, 2015, among the key problems of integrated sustainable development (SD) strategies was their inability to “translate a general vision into a concise, multi-sectoral policy program” ([49], p. 748). results on SD strategies studies can be regarded as equivalent to those of the newest Forest Strategy as well as the Green Deal, because they are cross-sectoral strategies constructed around the SD division into environmental, social and economic domains and share common characteristics of broad, imprecise, legally non-binding policies of a visionary rather than concrete application manner. As further argued by the authors, SD strategies across Europe were too vaguely formulated, and the related programmes too broad to become politically relevant solutions to concrete problems. While SD strategies succeed in raising “awareness of sectoral interdependencies [. . .], they did not help resolve sectoral turf battles but concealed them, inter alia, by employing win-win rhetoric that made it difficult to tackle trade-offs strategically” ([49], p. 748).

The trade-offs within the analysed strategies were identified both in relation to inter-strategy conflicts and intra-strategy conflicts. The demands on forests as providers of ecosystem functions, guardians of biodiversity and carbon sinks are combined with forests as sources of energy and producers of biomass. This is often done in one and the same strategy (e.g., Green Deal, Forest Strategy). Sectoral strategies, e.g., the Climate Target Plan, also incorporate these contradictions. Therefore, forests are expected to be carbon sinks and sources of energy production at the same time. In the Climate and Energy Plan, these demands receive company in terms of “forests as producers of biomass”. A similar situation was observed to occur in the International Forest Regime Complex [59], where synergies were found only between generally formulated, content-poor institutional elements, whereas concrete regime goals were always met with conflictive relations both between and within institutions [60]. This finding supports the observation with regard to complex international regimes and their resulting (in)effectiveness [61–63].

Attempts to merge different, often opposing, goals into one policy instrument results in contradictions within the policies themselves and between other policy sectors and consequential vertical and horizontal incoherences [1], which is particularly striking with regard to climate policy that has evolved to become an omnipresent reference in virtually all policy sectors [64]. One could suggest that the trade-offs resulting from contradicting goals in relation to one policy area may take different forms. They can either result in empty formula [65], i.e., strategies with no practical outcomes as described above, or lead to compromises that do not touch the core of the trade-offs (e.g., dislocating resourcing problems). In the worst case, they can even create negative effects and perverse incentives, i.e., an incentive that is contradictory to another policy objective [2,7]. For instance, biofuel policy was found to be potentially harmful to biodiversity objectives [66], while the European Union Timber Regulation (EUTR) was found to potentially violate article XI of the General Agreement on Tariffs and Trade (GATT) [67].

Promoting bioeconomy as a means to achieve a carbon neutral society, while limiting resource availability from forests, is another form of a trade-off. Avoiding addressing such trade-offs or burying them under multiple layers of governance is likely to hamper a



concise contribution to overarching political programmes and may lead to more ideological, instead of evidence-based, discourses. It is the identification of synergies that can make policies move towards a common direction (e.g., harness climate adaptation and mitigation with substitution effects through wood construction) [2].

Another issue considered is the lack of binding conditions for sectoral policies [49]. This shortcoming was possibly recognized by the Commission by suggesting the Nature Restoration ‘Law’. Indeed, being designed as a regulation and linking the Forest Strategy to the Biodiversity Strategy and the legally binding Habitats and Birds directives, the Nature Restoration Regulation seems to aim at substantially strengthening the environmental domain within the SD nexus. Here, however, the problem with the obligation to adhere to the principles of subsidiarity and proportionality might arise, since the environment is an area of shared competences between the EU and the Member States. As argued by de Sadeleer, 2012: “[. . .]subsidiarity comes much more to the fore in the environmental field than in other policies such as the internal market” ([55], p. 64).

The new forest-related instruments of recent years (in reference to the 2023 policy setting) have the form of a regulation. The trend towards increased EU regulation that seems to be forming runs contrary to the envisaged development of EU policy towards market-based and soft policy instruments that has been previously anticipated by some observers (e.g., [6,68]). In addition to the possible legal and legitimacy problems, overregulation may simply result in “implementation fatigue”. Indeed, an increasing number of legally binding EU policies will require the MSs to increase their administrative capacities to actually implement those policies [2]. If this does not happen (e.g., as found in the Natura 2000 cases [69]), implementation delays or gaps and a decrease in acceptance of EU activities in the field can be the result. The protest of forest owners and farmers against the EUDR in 2023 can be taken as an example. These gaps, in turn, may lead to the need for new legislation being adopted to address these gaps, which hampers and delays the implementation of the underlying objectives.

Summing up, the analysis observed an increasing regulation trend in the EU in forest-related policies that is mainly rooted in the environmental policy sector. New fields such as climate and energy policy emerge and gain in importance, mainly because of their intermingling with other policy sectors, which creates and defines additional demands on forests and the forest-based sector that can be expected to intensify in the coming years. Interestingly, cross-sectoral strategies have not been found to be able to resolve those conflicts so far because they increase the complexity of policy making without sorting out the trade-offs of conflicting objectives.

## 5. Conclusions

This work aimed at correlating the major forest-focused and forest-related EU policies that were adopted during the time periods of the coming into force of the three EU forest(ry) Strategies of 1998, 2013 and 2021. In doing so, we attempted to verify whether an increase in the number of forest-related EU policies can be observed and whether regulations are becoming a preferred instrument of EU forest-related policy. The results were brought into context and discussed in light of available information.

Three pairs of lists (programmes, strategies and instruments) for each of the Forest Strategy periods were created and analysed, and the respective documents are listed in the Annex. The analysis of the selected programmes, strategies and instruments has confirmed an overall increase in forest-related policies in the EU, mainly rooted in the environmental policy sector. A growing preference for regulations over directives as policy instruments was identified. This was found to cause increasing debates on subsidiary and shared

competences, and hence implementation domains between the European Commission and the Member States.

An overall shift in focus of forest-related policy from a resource perspective to an increasingly ecology-centred view on forests could be confirmed. Another key development we observed was the preference for cross-sectoral, multi-issue strategies by the Commission. Such a policy set-up does, however, not automatically solve the trade-offs at hand as they are (co-)produced by opposing policy goals, while vague formulations in these strategies are unable to effectively resolve these problems. New policy fields have gained increasing importance over the last 25 years, most prominently climate, energy and bioeconomy. These are creating and defining additional demands on forests and forest management that can be expected to intensify in the coming years. Finding ways to dovetail classical and emerging policy instruments and their implementation will be crucial to responding coherently to acute and systemic challenges in forest policy.

**Author Contributions:** Conceptualization, E.G., B.W. and N.W.; methodology, E.G., B.W. and N.W.; validation, E.G., B.W. and N.W.; formal analysis, E.G.; investigation, E.G.; data curation, E.G.; writing—original draft preparation, E.G.; writing—review and editing, E.G., B.W. and N.W.; visualization, E.G. All authors have read and agreed to the published version of the manuscript.

**Funding:** This research received no external funding.

**Data Availability Statement:** The data presented in this study are publicly available and can be accessed by using the provided references.

**Conflicts of Interest:** The authors declare no conflict of interest.

## References

1. Aggestam, F.; Pülzl, H. Coordinating the Uncoordinated: The EU Forest Strategy. *Forests* **2018**, *9*, 125. [CrossRef]
2. Wolfslehner, B.; Pülzl, H.; Kleinschmit, D.; Aggestam, F.; Winkel, G.; Candel, J.; Eckerberg, K.; Feindt, P.; McDermott, C.; Secco, L.; et al. *European Forest Governance Post-2020. From Science to Policy 10*; European Forest Institute: Joensuu, Finland, 2020.
3. Weber, N.; Böhnke, P. Europäische Forstpolitik zwischen Mythos und Realität—European Forest Policy—Myth or Reality? *Forst Holz* **2007**, *62*, 29–31. (In German language).
4. Pülzl, H.; Wydra, D.; Hogl, K. Piecemeal Integration: Explaining and Understanding 60 Years of European Union Forest Policy-Making. *Forests* **2018**, *9*, 719. [CrossRef]
5. Onida, M. Forest and forestry policy between the EU and its Member States. *elni Rev.* **2020**, 16–24. [CrossRef]
6. Wydra, D. The Legal Context of European Forest Policy-Making. In *What Science Can Tell Us. European Governance: Issues at Stake and Way Forward*; Pülzl, H., Hogl, K., Kleinschmit, D., Wydra, D., Arts, B., Mayer, P., Palahi, M., Winkel, G., Wolfslehner, B., Eds.; EFI Publications: Joensuu, Finland, 2013.
7. Pülzl, H.; Hogl, K.; Kleinschmit, D.; Wydra, D.; Arts, B.; Mayer, P.; Palahi, M.; Winkel, G.; Wolfslehner, B. (Eds.) *European Forest Governance: Issues at Stake and the Way Forward. What Science Can Tell Us 2*; European Forest Institute: Joensuu, Finland, 2013.
8. Weber, N. Participation or involvement? Development of forest strategies on national and sub-national level in Germany. *For. Policy Econ.* **2017**, *89*, 98–104. [CrossRef]
9. Warleigh-Lack, A.; Drachenberg, R. Policy Making in the European Union. In *European Union Politics*, 3rd ed.; Cini, M., Pérez-Solórzano Borragán, N., Eds.; Oxford University Press: Oxford, UK, 2010; Chapter 13.
10. UK Parliament Website. Common Agricultural Policy. 1998. Available online: <https://api.parliament.uk/historic-hansard/commons/1998/may/21/common-agricultural-policy> (accessed on 15 June 2023).
11. COM. 649 Final, A Forestry Strategy for the European Union. 1998. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:51998DC0649> (accessed on 26 May 2023).
12. COM. 42 Final, A European Community Biodiversity Strategy. 1998. Available online: <https://eur-lex.europa.eu/legal-content/EN/HIS/?uri=celex:51998DC0042> (accessed on 26 May 2023).
13. COM. 353 Final, Climate Change—Towards an EU Post-Kyoto Strategy. 1998. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:51998DC0353&from=PT> (accessed on 26 May 2023).

14. Council Resolution 93/C 138/01, 5th Environmental Action Programme. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:C:1993:138:FULL> (accessed on 26 May 2023).
15. COM. 659 Final, A New EU Forest Strategy: For Forests and the Forest-Based Sector. 2013. Available online: [https://eur-lex.europa.eu/resource.html?uri=cellar:21b27c38-21fb-11e3-8d1c-01aa75ed71a1.0022.01/DOC\\_1&format=PDF](https://eur-lex.europa.eu/resource.html?uri=cellar:21b27c38-21fb-11e3-8d1c-01aa75ed71a1.0022.01/DOC_1&format=PDF) (accessed on 26 May 2023).
16. COM. 244 Final, EU 2020 Biodiversity Strategy. 2011. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52011DC0244> (accessed on 26 May 2023).
17. COM. 216 Final, An EU Strategy on Adaptation to Climate Change. 2013. Available online: <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2013:0216:FIN:EN:PDF> (accessed on 26 May 2023).
18. Decision No 1386/2013/EU, 7th Environmental Action Programme. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013D1386> (accessed on 26 May 2023).
19. COM. 572 Final, EU Forest Strategy for 2030. 2021. Available online: [https://eur-lex.europa.eu/resource.html?uri=cellar:0d918e07-e610-11eb-a1a5-01aa75ed71a1.0001.02/DOC\\_1&format=PDF](https://eur-lex.europa.eu/resource.html?uri=cellar:0d918e07-e610-11eb-a1a5-01aa75ed71a1.0001.02/DOC_1&format=PDF) (accessed on 11 April 2022).
20. COM. 380 Final, EU Biodiversity Strategy for 2030. 2020. Available online: [https://eur-lex.europa.eu/resource.html?uri=cellar:a3c806a6-9ab3-11ea-9d2d-01aa75ed71a1.0001.02/DOC\\_1&format=PDF](https://eur-lex.europa.eu/resource.html?uri=cellar:a3c806a6-9ab3-11ea-9d2d-01aa75ed71a1.0001.02/DOC_1&format=PDF) (accessed on 30 May 2023).
21. COM/2020/562 Final, 2030 Climate Target Plan. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020DC0562> (accessed on 30 May 2023).
22. COM/2014/015 Final, 2030 Climate and Energy Framework. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52014DC0015> (accessed on 30 May 2023).
23. COM. 283 Final, EU Bioeconomy Strategy Progress Report. 2022. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52022DC0283> (accessed on 30 May 2023).
24. COM. 640 Final, The European Green Deal. 2019. Available online: [https://eur-lex.europa.eu/resource.html?uri=cellar:b828d165-1c22-11ea-8c1f-01aa75ed71a1.0002.02/DOC\\_1&format=PDF](https://eur-lex.europa.eu/resource.html?uri=cellar:b828d165-1c22-11ea-8c1f-01aa75ed71a1.0002.02/DOC_1&format=PDF) (accessed on 30 May 2023).
25. Council Directive 92/43/EEC, EU Habitats Directive. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31992L0043> (accessed on 26 May 2023).
26. Directive 2009/147/EC, Birds Directive. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32009L0147> (accessed on 26 May 2023).
27. Directive 2014/52/EU, Environmental Impact Assessment Directive. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014L0052> (accessed on 26 May 2023).
28. Directive 2003/4/EC, Freedom of Access on Information on the Environment. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32003L0004> (accessed on 26 May 2023).
29. Directive 2004/35/CE, Environmental Liability Directive. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32004L0035> (accessed on 26 May 2023).
30. Directive 2008/99/EC, Environmental Crime Directive. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32008L0099> (accessed on 26 May 2023).
31. Directive 2001/42/EC, Strategic Impact Assessment Directive. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042> (accessed on 26 May 2023).
32. Regulation (EU) 2020/852, Taxonomy Regulation. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32020R0852> (accessed on 30 May 2023).
33. COM. 304 Final (Proposal for a Regulation), Nature Restoration Law. 2022. Available online: <https://environment.ec.europa.eu/system/files/2022-06/Proposal%20for%20a%20Regulation%20on%20nature%20restoration.pdf> (accessed on 30 May 2023).
34. Council Regulation (EEC) No 867/90, Improving the Processing and Marketing Conditions for Forestry Products. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31990R0867> (accessed on 26 May 2023).
35. Council Regulation (EEC) No 2158/9, Protection of the Community's Forests Against Fire. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31992R2158> (accessed on 26 May 2023).
36. Council Regulation (EEC) No 3528/86, The Community Scheme for the Protection of Forests Against Atmospheric Pollution. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31986R3528> (accessed on 26 May 2023).
37. Council Regulation 1100/98, European Forestry Information and Communication System (EFICS). Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31998R1100> (accessed on 26 May 2023).
38. Regulation (EU) No 995/2010, EU Timber Regulation. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32010R0995> (accessed on 26 May 2023).
39. Council Regulation (EC) No 2173/2005, Forest Law Enforcement Governance and Trade Regulation (FLEGT). Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32005R2173> (accessed on 26 May 2023).

40. Directive 2009/28/EC, Renewable Energy Directive I. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32009L0028> (accessed on 26 May 2023).
41. Council Decision 93/500/EEC, Promotion of Renewable Energy Sources (Altener Programme). Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31993D0500> (accessed on 26 May 2023).
42. Directive (EU) 2018/2001, Renewable Energy Directive II. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018L2001> (accessed on 30 May 2023).
43. Regulation (EU) No 525/2013, Mechanism for Monitoring and Reporting Greenhouse Gas Emissions. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013R0525> (accessed on 30 May 2023).
44. Decision No 529/2013/EU, Accounting Rules on Greenhouse Gas Emissions and Removals. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013D0529> (accessed on 30 May 2023).
45. Regulation (EU) 2018/841, Regulation on the Land Use, Land Use Change and Forestry (LULUCF). Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018R0841> (accessed on 30 May 2023).
46. Regulation (EU) 2018/1999, Governance of the Energy Union and Climate Action. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018R1999> (accessed on 30 May 2023).
47. Regulation (EU) 2023/1115, The European Deforestation Regulation. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32023R1115> (accessed on 30 May 2023).
48. Rittbergen, B.; Richardson, J. Old Wine in New Bottles? The Commission and the Use of Environmental Policy Instruments. *Public Adm.* **2003**, *81*, 575–606. [\[CrossRef\]](#)
49. Nordbeck, R.; Steurer, R. Multi-sectoral strategies as dead ends of policy integration: Lessons to be learned from sustainable development. *Environ. Plan. C Gov. Policy* **2015**, *34*, 737–755. [\[CrossRef\]](#)
50. Héritier, A. *New Modes of Governance in Europe: Policy Making without Legislating?* Political Science Series; Institute for Advanced Studies: Vienna, Austria, 2002.
51. Radaelli, C. Policy Transfer in the European Union: Institutional Isomorphism as a Source of Legitimacy. *Governance* **2000**, *13*, 25–43. [\[CrossRef\]](#)
52. Smith, V.A. *Democracy in Europe: The EU and National Policies*; Oxford University Press: Oxford, UK, 2006.
53. Beetham, D.; Lord, C. *Legitimacy and the European Union*; Longman: London, UK; New York, NY, USA, 1998.
54. Eriksen, E.O.; Fossum, J.E. Democracy through Strong Publics in the European Union? *J. Common Mark. Stud.* **2002**, *40*, 401–424. [\[CrossRef\]](#)
55. De Sadeleer, N. Principle of Subsidiarity and the EU Environmental Policy. *J. Eur. Environ. Plan. Law* **2012**, *9*, 63–70. [\[CrossRef\]](#)
56. Steurer, R.; Martinuzzi, A. Towards a new pattern of strategy formation in the public sector: First experiences with national strategies for sustainable development in Europe. *Environ. Plan. C Gov. Policy* **2005**, *23*, 455–472. [\[CrossRef\]](#)
57. Howlett, M.; Rayner, J.; Goehler, D.; Heidbreder, E.; Perron-Welch, F.; Rukund, O.; Verkooijen, P.; Wildburger, C. Overcoming the challenges to integration: Embracing complexity in forest policy design through multi-level governance. In *Embracing Complexity: Meeting the Challenges of International Forest Governance*; Rayner, J., Buck, A., Katila, P., Eds.; IUFRO World Series; University of Oxford: Oxford, UK, 2011; Volume 28, pp. 93–110.
58. Winkel, G.; Sotirov, M. Whose integration is this? European forest policy between the gospel of coordination, institutional competition, and a new spirit of integration. *Environ. Plan. C Gov. Policy* **2016**, *34*, 496–514. [\[CrossRef\]](#)
59. Glück, P.; Angelsen, A.; Appelstrand, M.; Assembe-Mvondo, S.; Auld, G.; Hogl, K.; Humphreys, S.D.; Wildburger, C. Core components of the international forest regime complex. In *Embracing Complexity: Meeting the Challenges of International Forest Governance*; Rayner, J., Buck, A., Katila, P., Eds.; IUFRO World Series; University of Oxford: Oxford, UK, 2010; Volume 28, pp. 37–55.
60. Rodríguez Fernández-Blanco, C.; Burns, S.L.; Giessen, L. Mapping the fragmentation of the international forest regime complex: Institutional elements, conflicts and synergies. *Int. Environ. Agreem.* **2019**, *19*, 187–205. [\[CrossRef\]](#)
61. Wettestad, J. Designing Effective Environmental Regimes: The Conditional Keys. *Glob. Gov.* **2001**, *7*, 317–341. [\[CrossRef\]](#)
62. Grundmann, R. Ozone and climate governance: An implausible path dependence. *Comptes Rendus Geosci.* **2018**, *350*, 435–441. [\[CrossRef\]](#)
63. Gordeeva, E. The securitization of global environmental policy—an argument against. *Eur. J. Secur. Res.* **2022**, *7*, 5–20. [\[CrossRef\]](#)
64. Eberl, J.; Gordeeva, E.; Weber, N. The Policy Coherence Framework Approach in a Multi-Level Analysis of European, German and Thuringian Climate Policy with a Special Focus on Land Use, Land-Use Change and Forestry (LULUCF). *World* **2021**, *2*, 415–424. [\[CrossRef\]](#)
65. Krott, M. *Forest Policy Analysis*; Springer: Berlin/Heidelberg, Germany, 2005.
66. Eggers, J.; Tröltzsch, K.; Falcucci, A.; Maiorano, L.; Verburg, P.H.; Framstad, E.; Louette, G.; Maes, D.; Nagy, S.; Ozinga, W.; et al. Is biofuel policy harming biodiversity in Europe? *GCB Bioenergy* **2009**, *1*, 18–34. [\[CrossRef\]](#)

67. Geraets, D.; Natens, B. *The WTO Consistency of the European Union Timber Regulation*; Working Paper No. 120; Leuven Centre for Global Governance Studies: Leuven, Belgium, 2013.
68. Collier, U. The environmental dimension of deregulation. In *Deregulation in the European Union. Environmental Perspectives*; Collier, U., Ed.; Routledge: London, UK, 1998.
69. Geitzenauer, M.; Blondet, M.; De Koning, J.; Ferranti, F.; Sotirov, M.; Weiss, G.; Winkel, G. The challenge of financing the implementation of Natura 2000—Empirical evidence from six European Union Member States. *For. Policy Econ.* **2017**, *82*, 3–13. [[CrossRef](#)]

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