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DO RIO DE JANEIRO



Clapton Elias Joe Jonsson

**Non-Wood Forest Products in International Trade:
An examination of the EU's legislative perspective**

Dissertação de Mestrado

Dissertation presented to the Programa de Pós-Graduação em Análise e Gestão de Políticas Internacionais (MAPI) of Instituto de Relações Internacionais of PUC-Rio in partial fulfillment of the requirements for the degree of Mestre.

Advisor: Prof. Carlos Frederico Coelho

Rio de Janeiro
November 2020



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To my parents, for their support
and encouragement.

Abstract

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This article attempts to examine European trade policy regarding non-wood forest products (NWFP) from the perspective of the EU legislature, with the hypothesis that there is little EU trade policy promoting NWFP production and imports from other countries to the EU. The examination was done by using document analysis as method to examine public records in the EUR-Lex database containing the keyword “non-wood forest products.” In its findings, the article presents relevant paragraphs containing the keyword together with contextual information and analysis. The article concludes that its hypothesis is correct in that there is little policy related to NWFP trade and NWFPs tend to be treated as simply another forest product, not as a particular type of forest product with merits of its own (such as environmental and socioeconomic benefits). The article ends with suggestions for policy and action to support international trade in NWFPs.

Keywords

Non-wood forest products; International trade; European Union.

Resumo

Jonsson, Clapton Elias Joe; Coelho, Carlos Frederico. **Produtos florestais não madeireiros no comércio internacional: uma análise da perspectiva legislativa da UE.** Rio de Janeiro, 2020. 48p. Dissertação de Mestrado – Instituto de Relações Internacionais, Pontifícia Universidade Católica do Rio de Janeiro.

Este artigo busca examinar a política comercial europeia em relação aos produtos florestais não madeireiros (non-wood forest products; NWFP) sob a perspectiva da legislatura da UE, com a hipótese de que há pouca política comercial da UE que promova a produção e as importações desses produtos de outros países para a UE. O exame foi feito usando a análise de documentos como método para examinar os registros públicos na base de dados EUR-Lex contendo a palavra-chave “non-wood forest products”. Em seus resultados, o artigo apresenta parágrafos relevantes contendo a palavra-chave juntamente com informações contextuais e análises. O artigo conclui que sua hipótese está correta no sentido de que há pouca política relacionada ao comércio de NWFPs e os NWFPs tendem a ser tratados simplesmente como outros produtos florestais, não como um tipo particular de produto florestal com méritos próprios (como benefícios ambientais e socioeconômicos). O artigo termina com sugestões de políticas e ações para apoiar o comércio internacional de NWFPs.

Palavras-chave

Produtos florestais não madeireiros; Comércio internacional; União Europeia.

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1. Introduction

During the last two years, European leaders have been paying increasing attention to fires raging in the Amazon and, consequently, to the cost of deforestation to our climate. A steadily rising preoccupation with climate change has become all the more noticeable since the 2015 Paris Agreement came into effect. Climate change is no more simply an item on the agenda of world leaders, but a priority policy concern in gatherings of the G5, G20 and Davos. Climate featured prominently in the recently concluded negotiations of the EU-Mercosul trade agreement.

Deforestation also has its proponents who see economic gain—be it from clearing land for cattle pasture and plantations, or from extracting minerals buried below ground—that is not offered to them elsewhere. An alternative source of income that prevents deforestation, while being sustainable and socially beneficial, is that of non-wood forest products (NWFP). These are products that forests provide naturally, which could be edible products (such as nuts, fruits and berries), extracts for medicinal purposes (such as herbs), or ingredients in cosmetic products (aromatic plants and oils). From the perspective of European leaders worried about the impact of deforestation on the climate, there should be a policy focus on the production and trade related to these products to counter deforestation. As Europe is one of the main destinations for NWFP exports, EU trade policy has a significant influence on their success.

The research for this article began under the assumption that there was little EU policy explicitly geared toward international production and/or trade in NWFPs. It set out to test this hypothesis by examining public documents from the EU's legislative branches and the contexts in which the term “non-wood forest products” appears. Two questions were asked regarding the texts examined: if it promotes NWFP production outside the EU, and if it promotes imports of NWFPs to the EU. What motivated the research was the idea that only after determining the extent of NWFPs' prevalence in existing policy could appropriate suggestions be made for future policy discussions.

After this introductory part, the article continues with a literature review where NWFPs and their relation to the EU and aspects of their global value chains are touched on. It also briefly covers aspects of content analysis, the method used

to conduct the research. This is followed by a description of the methodology employed and subsequently by a presentation of the findings with analysis. The article then enters on a discussion of the findings, where policy recommendations are put forward, and ends with a concluding section.

2. Literature review

2.1 Non-wood forest products and Europe

The European Union has in recent years intensified focus on policy related to creating a sustainable “bioeconomy” to face climate change (European Commission 2012, 2018). Bioeconomy is a broad concept that fits many types of approaches. Sillanpää and Ncibi point to the definitions of the European Union, the EU member Finland, and the OECD. The first-mentioned limits the concept to the agricultural and manufacturing sectors as actors but broadens their activity to include anything related to biological resources. Finland does not define the actors and specifies that the bioeconomy must include produce that relies on natural resources that are renewable, the objective being to reduce dependency on traditional finite fuel supplies while creating sustainable growth. The OECD sees the bioeconomy as nearly synonymous with biotechnology (2017:30–1). The bioeconomy, then, does not automatically translate into being good for the environment, even where it qualifies as renewable. An agricultural producer using renewable biomass such as plants, for example, might need to deforest in order to let the plants grow. Non-wood forest products (NWFP), and non-timber forest products (NTFP), are a category of biological products relying on sustainable production, usually through harvesting, which counters deforestation (forests need to be maintained for production to continue), contributing ecologically and environmentally, while also providing socioeconomic benefits to local populations (Gaoue et al. 2016; Mukul et al. 2010; Sakai et al. 2016).

The Food and Agriculture Organization’s (FAO) definition of NWFPs states that they “consist of goods of biological origin other than wood, derived from forests, other wooded land and trees outside forests.” Another similar term commonly used in the literature is Non-Timber Forest Products (NTFP). While the former term “excludes all woody raw materials,” such as “timber, chips, charcoal and fuelwood, as well as small woods such as tools, household equipment and carvings,” the latter “generally include fuelwood and small woods” (Dembner and Perlis 1999). The term NTFP is nevertheless frequently employed in the literature even where it refers to non-wood products, which can get confusing, as there is no consensus regarding whether wooden parts of plants (such as bark, branches, and

stems) should be included in the term. The FAO therefore recommends the use of the term NWFP to avoid inconsistencies (Shackleton, C. et al. 2011:4–5).

Europe is one of the main markets for NWFPs, with the EU accounting for almost half of all global imports (Wolfslehner, Prokofieva, and Mavsar 2019:35). However, the value of trade in NWFPs is likely underestimated. Trade in NWFPs increased from 1.1 billion € in 1995 to an estimated 2.28 billion € in 2015 (Forest Europe 2015; UN Economic Commission for Europe [UN-ECE] and FAO 2000), but the difference in values is not primarily due to varying trends in trade quantities but to the quality of regional data. This lack of reliable data demonstrates the low importance that is generally given to the sector, but also reinforces the impression that NWFP trade is not important, as the full value of European NWFP trade is not known (Lovrić et al. 2020). It has been argued that NWFPs are not given sufficient attention “because monitoring of their production, consumption and trade is inadequate and statistics are lacking or incomplete as a result of fragmented value chains, complex trade patterns and use outside the formal sector” (FAO 2017:12) and because of the costs involved in data collection, as well as “a non-homogenous nomenclature among the EU countries on NWFP categories” (Vidale, Da Re, and Lovrić 2014:5). This exacerbates the difficulty policy makers encounter in taking effective action to promote trade in NWFPs (Brack 2018:23).

The EU has no policy aimed specifically at NWFPs, nor does it have a common forest policy. Forest regulations are usually set on the national or subnational level, but the EU does have a common forest strategy, where NWFPs are mentioned, and it “can influence national forest policies through common political processes” (FAO 2017:4, 6, 58). Nevertheless, forest management and planning have traditionally tended to focus on wood products while considering non-wood products of lesser relevance (Calama Sainz et al. 2010:70; Huber et al. 2019:103–4). Although the majority of EU Member States’ policies related to forest management do mention NWFPs, particularly after the initial EU forest strategy came into effect in 1998, it is unclear to what degree such policy integrates with already existing legislation and how implementation is planned and carried out in practice. In the majority of European countries, there is either no adequate institutional capacity, or there is a paucity of resources, to effectively implement legislation governing the NWFP sector. Overlapping laws and mandates are an example of such challenges. Policy that addresses NWFPs as a whole is rare. Laws

and mandates usually address concerns that are specific to a local sector and NWFPs relevant to that particular economy (FAO 2017:65–6).

The EU is also bound by international agreements which might have a direct or indirect influence on trade in NWFPs. These include the Convention on Biological Diversity (CBD), which attempts to integrate international environmental law with international trade to protect biodiversity and promote sustainable use of biological resources; the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), which regulates trade in wild fauna and flora to avoid conservation threats and protect endangered species; and the International Tropical Timber Agreement (ITTA), which states as one of its objectives to promote the sustainable use of timber-producing forests (Burgener 2007:15, 17–8, 21–2, 25–6).

The European NWFP trade, like all international trade, is also bound by the rules of the World Trade Organization (WTO). The WTO has no pervasive environmental clause of its own but refers to MEAs (Multilateral Environmental Agreements) to which countries are parties, such as the Paris Agreement. That agreement allows for countries to design their own strategy to reach climate goals. In this context, NTFPs and NWFPs have received increased interest with the EU's bioeconomy strategy, a plan meant to achieve the union's environmental goals while simultaneously contributing to growth in transitioning to a "green" economy (European Commission 2018; FAO 2017:100–3; International Union of Forest Research Organizations [IUFRO] n.d.).

2.2 Global value chains

Studies of biodiverse value chains in Peru agree that adequate existing markets are important for small-producer initiatives and their success, and that restrictive access to markets, especially the European ones, is a significant obstacle (Blare and Donovan 2016; Tobin et al. 2016). While, in cases of broader market demand for NWFPs, opportunities might open up for small producers, such openings are hard to capitalize on without some type of intervention to assist producers in augmenting their capacity and enhance their value chains (Blare and Donovan 2016:8–10; Keča, Keča, and Rekola 2013:326; Sousa et al. 2016:168). One example of concerns raised by foreign buyers is the lack of product uniformity

between small producers, who do not have the means to adequately adapt production to foreign markets' expectations (Blare and Donovan 2016:10). In the case of Serbia, marketing capacity was one of the main obstacles to small producers in obtaining sustainable profits, especially when trying to expand their value chains to the EU market (Keča, Keča, and Rekola 2013). In some cases, particular local conditions, not necessarily restricted only to NWFP value chains, constitute the main obstacle. Corruption in Cameroon, for example, allow for arbitrary regulatory processes where small producers, who cannot afford bribes, are forced into informal markets where their opportunities are limited (Tieguhong et al. 2015).

In the case of Brazil and Brazil nut, Terborgh and Peres remind us of the fact that the nut is currently “the only major non-timber product of global commerce to be extracted from natural tropical forests,” but criticize the belief that it can continue to be extracted sustainably over a long period of time, pointing to its slow maturing process (which is why it has not been seriously considered for wider commercial purposes previously) and the fact that artificial Brazil nut plantations, with smaller trees, are already taking over and the need for wild-growing nuts will inevitably disappear (2017:4). Government policy has traditionally not been centered on NWFPs in Brazil, as these have been considered a minor activity that causes little impact on forests, in comparison with timber extraction (Klüppel et al. 2010:43).

Collectors of NWFPs or NTFPs are usually forest dwellers and communities that do not engage in high-level economic activity. Their produce is often sold directly to consumers in local markets or transferred to retailers. In various tropical areas, such collectors have been found to be in high demand among local communities, both for their own and commercial needs. As a result of this, the viability of commercial extraction of NWFPs to meet demands exogenous to the local communities could pose a threat to long-term sustainable production, potentially leading to the deterioration of the product (Saha and Sundriyal 2012:36). A Brazilian study found that high dependence on a few specific biodiversity products lead to worsening socioeconomic conditions for harvesters, in addition to vulnerable economic conditions related to the strong reliance on fluctuating market demands. By improving their harvesting methods, communities might actually contribute to such fluctuations (as supplies increase but demand stays the same), as well as amplifying the risk of negative ecological impacts. Harvesters are usually small producers with little or no collective organization, operating with few

resources and restricted infrastructure, which results in small quantities of produce. Combined with limited knowledge about the value chain's commercial workings, such as quality demands and how prices are set by end consumers and middle-hands, vulnerable economic conditions tend to persist (Silva, Gomes, and Albuquerque 2017:8–9). A study of forest communities in Nepal engaged in the harvesting of NWFPs and NTFPs found that wide-spanning cooperative organization, centered around community-based enterprises, could greatly enhance communities' opportunities and reduce their socioeconomic vulnerability (Pandit, Albano, and Kumar 2009).

One of the foremost obstacles to trade in NWFPs is phytosanitary requirements. Although important to protect consumers' health, changes in requirements for specific products in larger export markets, such as the EU, can have wide-spread effect on the producers in developing countries. An often-cited example is when in the 1990s the EU limited the amount of aflatoxins allowed in Brazil nut imports. Being an important export industry, the Bolivian government soon created directives for such exports. While larger producers adapted to the new requirements, they inevitably hurt small producers—such as cooperatives and small communities—lacking the organizational capacity to smoothly adjust to such changes. Even where small producers do manage, it means extended bureaucratic processes and delays, draining small producers' already scarce resources (Burgener 2007:1, 42, 74; Laird, Wynberg, and McLain 2010:349). Certificates and extended bureaucracy can also lead to corruption. Not just in attaining the necessary papers for production; bribery along transportation routes within a country (for example, between states) is a problem, especially where complicated permits and licenses are required for moving goods between places (Laird, Wynberg, and McLain 2010:349–50).

Excessive regulation of a product, or an outright ban in order to avoid depletion, can result in trade assuming illegal form, making it harder to track and implement measures to promote sustainable harvesting. Excessive regulation tends to hurt small producers without the means to adapt. But too little regulation can also be hurtful as there are few means to establish a product's safety, thus making it more sensible to social influences. A product that is selling well can suddenly see its number dwindle due to, for example, bad press coverage, such as was the case

with the West African Griffonia herb, which left African suppliers with large stocks of unsellable products (Pierce and Bürgener 2010:332–4).

Another challenge that has appeared in global trade in NWFPs is the Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPS) of the WTO. An increasing amount of herbs are covered by intellectual property laws, especially in the medical and cosmetic sectors. The challenge extends to directives for regional labeling where prerequisites do not include cultural or traditional practices, effectively excluding small producers who have a history of harvesting a specific product, such as indigenous communities, from marketing themselves as selling “genuine” products (FAO 2017:5; Laird et al. 2010:353–4; Pierce and Bürgener 2010:336). It is not uncommon that laws and policy are incompatible with local conditions, such as cultural and traditional practices, or do not take into account conditions that affect problems at hand. In Brazil, for example, laws were enacted to forbid the felling of Brazil nut trees, which resulted in stockbreeders simply felling trees around them to allow for cattle pasture and leaving the isolated Brazil nut trees to die (Pierce and Bürgener 2010:330). A common problem is the lack of involvement of small producers, such as indigenous or local communities, in policy making. It is usually larger producers and enterprises that take part in such discussion, while smaller producers—on whose livelihood such policy can have a decisive impact—are excluded due to lack of resources or organizational capacity to attract governments’ attention (Laird et al. 2010:346–7; Pierce and Bürgener 2010:335).

2.3 Content analysis

Hsieh and Shannon define “qualitative content analysis” as “a research method for the subjective interpretation of the content of text data through the systematic classification process of coding and identifying themes or patterns” (2005:1278). Moreover, the use of a “summative approach to qualitative content analysis starts with identifying and quantifying certain words or content in text with the purpose of understanding the contextual use of the words or content” (2005:1284). The quantitative approach counts the appearances of certain words in textual content and is referred to as “manifest content analysis,” where interpretation of meaning attached to words and context is avoided. A summative

approach, on the contrary, attempts to interpret “latent content”—meaning beneath the surface (Bryman 2012:290; Hsieh and Shannon 2005:1284).

Content analysis is often defined as objective (in that “there is transparency in the procedures for assigning” meaning) and systematic (in that “the application of the rules is done in a consistent manner so that bias is again suppressed”) (Bryman 2012:289). Nevertheless, qualitative approaches to content analysis will always contain a degree of subjectiveness—be it in the selection of data, the representation of data, or the interpretation of it (Bowen 2009:29, 32; Bryman 2012:293, 297–8, 306). It is therefore important to be aware of one’s biases and pre-understandings with potential to influence the analysis (Erlingsson and Brysiewicz 2017:95). The intuitive nature of qualitative content analysis is frequently regarded as a limitation, but opinions differ. In the view of Erlingsson and Brysiewicz, “intuition is a great asset in qualitative analysis and not to be dismissed as ‘unscientific’. Intuition results from tacit knowledge. Just as tacit knowledge is a hallmark of great clinicians; it is also an invaluable tool in analysis work” (2017:97).

Content analysis is most commonly applied to interviews and media research (Bryman 2012:290; Erlingsson and Brysiewicz 2017:94). Document analysis is commonly used as a complementary approach for gathering background information or verifying statements in interview material, but can also be used as a stand-alone research method. A key advantage of documents, in contrast to interviews, is that they have been created without the researcher’s involvement (Bowen 2009:27, 29). Document analysis is similar to other qualitative approaches in that it “requires that data be examined and interpreted in order to elicit meaning, gain understanding, and develop empirical knowledge” (2009:27). It does this by “finding, selecting, appraising (making sense of), and synthesising data contained in documents” and then categorizing quotes or excerpts (2009:28).

Bowen stresses the importance of transparency in designing, conducting and presenting a study, by pointing to an example where the authors “failed to identify the documents analysed—even the nature or type of documents—and the analytical procedure employed” (2009:27, 29). A document’s purpose—why it was created and for whom—must be taken into account. Even official documents should never be considered accurate or truthful recordings of events: objectivity, in addition to sensitivity, is expected in selecting and analyzing data. Documents are,

on the other hand, “unobtrusive” and “stable,” removing concerns related to reflexivity (the researcher’s influence on what is being researched) and providing good replicability (2009:30–3).

3. Methodology & presentation

The research for this article used document analysis to examine public records from the EUR-Lex database. EUR-Lex “provides the official and most comprehensive access to EU legal documents” and includes: treaties; legal acts and preparatory documents from EU institutions; EU case-law; international agreements; EFTA documents; “references to and, for those Member States that agreed, also texts of national transposition measures;” and “references to national case-law related to EU law” (Publications Office of the European Union n.d.). Data selection was based on three criteria: (1) documents dated to 1990 or later; (2) documents in English, and; (3) documents containing the keywords “non-wood forest products,” “non-wood forest product,” or “nonwood forest products.”¹ The search in the EUR-Lex database was performed on September 7, 2020, and resulted in 42 results: 42 documents containing the keyword “non-wood forest products,” three documents containing the keyword “nonwood forest products” (all of them also containing the keyword “non-wood forest products”), and zero documents containing the term “non-wood forest product.” These documents were accessed as PDF files.

From these documents were extracted paragraphs containing the terms “non-wood forest products” and “nonwood forest products” (from here on referred to as “NWFP terms”). In the next section, “Findings,” paragraphs extracted according to this procedure are presented for 14 documents. While all 42 documents encountered in the search were examined, many of them contained identical language in regard to NWFPs. In these cases, the most recent document is presented, with a footnote indicating which the other related documents are and to when the oldest of them dates. For each document, title, date and CELEX² document number are indicated. Each paragraph in the document containing a NWFP term is presented, together with contextual information. Where less such information is deemed necessary to understand the context in which NWFP terms appear in relation to the research, sometimes simply the (sub)heading under which the paragraph appears is indicated.

¹ Initially, the keyword “NWFP” was also used in the search, but the results referred not to non-wood forest products, but to the North-West Frontier Province in Pakistan. Therefore, the search term was excluded from the research.

² CELEX is the document number code used within EUR-Lex and serves as a unique identifier in the database (Publications Office of the European Union n.d.).

Due to inconsistent use of page numbering in the examined documents, page references under “Findings” refer to the pages of the PDF file, which do not necessarily correspond to the pages indicated in the document itself.

Together with the cited paragraphs and contextual information, a short analysis is presented responding to the following questions: (1) “Does the paragraph, and the context in which it appears within the document examined, promote NWFP production in countries outside the EU?” and (2) “Does the paragraph, and the context in which it appears within the document examined, promote NWFP imports from countries outside the EU?”³ The analysis adopts a broader interpretation of the word “promote,” in the sense that it does not need to entail concrete policy, but could be in the form of a perceived attitude, stance, or opinion deemed favorable to foreign production and/or the importation of NWFPs.

As a quantitative inquiry, appearances of NWFP terms and the terms “trade,” “international trade,” and “global trade” were counted.⁴ Occurrences in documents’ titles, tables of contents, or footnotes were excluded from the count.

³ While it could be argued that analysis, which is by nature interpretive, should be presented separately from findings, to facilitate the reading process and respect the article’s size limit, analysis for each document is here presented under “Findings.” Findings and analyses are discussed in the section that follows them.

⁴ The terms “foreign trade,” “external trade,” and “overseas trade” were found to be non-existent in the examined documents.

4. Findings

In the 14 documents presented here, the keyword “non-wood forest products” appears 19 times, “trade” 125 times, “international trade” 17 times, and “global trade” one time. Neither of the three latter terms appear in the same paragraph as “non-wood forest products.” The term “non-wood forest products” (and “nonwood forest products”) appears together with “wood products” in 9 of the 17 paragraphs presented, and on its own in 8 of the paragraphs.

Non-wood forest products	Trade	International trade	Global trade
19	125	17	1

Figure 1: Occurrences of selected keywords in the documents presented.

For clarity, the term “non-wood forest products” (and “nonwood forest products”) will be highlighted in bold in the cited paragraphs.

Document title: *Call for proposals for RTD activities under the specific programme for research and technological development, including demonstration, in the field of cooperation with third countries and international organizations (1994-1998)*

Date: April 18, 1996

CELEX: C199611311⁵

Paragraph (1/1):

— non-food: wood, charcoal, **non-wood forest products**, cotton-based textiles, feed stuff (European Commission 1996:6)

Contextual information:

The document constitutes a “call for proposals” and states that “this call aims at facilitating the access of small and medium-sized farms and agro-industrial enterprises in developing countries to the market” (1996:5). As a specific topic, it lists “Transformation and use,” for which category, the document explains, “proposals should address foodstuffs, for man or for livestock, and non-food

⁵ This document has an older version that stopped being valid with the publication of this version (p. 10). The CELEX number of the older version is C199607520.

products resulting from the processing of a biological raw material” and that “biological raw materials which are covered by this call are defined in the regional priorities” (1996:5). Under the section “regional priorities” and subsection “Mediterranean,” “non-wood forest products” are included as a type of non-food product that could be included in proposals under the category “Transformation and use” (1996:5–6).

The “Mediterranean” subsection additionally says that “special attention should be paid to the impact of the Euro-Mediterranean Partnership Policy, in particular the establishment of a free trade zone before 2010” (1996:6). According to the European Commission, the referred-to partnership has as its “key objective” the “creation of a deep Euro-Mediterranean Free Trade Area, which aims at removing barriers to trade and investment between both the EU and Southern Mediterranean countries and between the Southern Mediterranean countries themselves” (2020).

Analysis:

The paragraph cited appears in a “call for proposals” and does mention NWFPs specifically, albeit together with wood products, in relation to reducing trade barriers. Although particular proposals emanating from this call have not been included in the research, the mention of NWFPs, and the context in which they appear, does indicate a positive attitude towards promoting imports of such products from outside the EU. It also indicates NWFPs as a particular type of product whose production should be encouraged in countries for which the project proposals are intended.

Document title: *COUNCIL RESOLUTION of 15 December 1998 on a forestry strategy for the European Union*

Date: February 26, 1999

CELEX: 31999Y0226(01)

Paragraph (1/1):

the promotion of the use of wood and **non-wood forest products** from sustainably managed forests as environmentally friendly products in line with the rules of the open market (Council of the European Union 1999:2)

Contextual information:

The document's opening paragraph acknowledges "the benefits of a Forestry Strategy for the European Union as set out in this Resolution based primarily on the general analysis and guidelines of the Communication of the Commission to the Council and the European Parliament" and identifies "substantial elements of this common Forestry Strategy," among them what is described in the cited paragraph (1999:1–2).

Analysis:

The part mentioning NWFPs does promote the production of those products (together with wood products), but as the forest strategy referred to in the text pertains to European forests, it cannot be said to promote NWFP imports from, or production in, countries outside the EU.

Document title: *Opinion of the Economic and Social Committee on 'The European Union's Forestry Strategy'*

Date: February 23, 2000

CELEX: 51999IE1138

Paragraph (1/1):

In the European Union 65 % of forest land is privately owned and there are 12 million individual forest owners. The crucial role of family forestry is not always given sufficient attention in the European debate on forestry. Coordination between individual forest owners is an important instrument for achieving a balance between supply and demand in the timber market. The Committee assumes that the application of EU competition rules will allow such coordination throughout the Member States. Forestry is economically important to many family forest owners. The economic importance of forests and for example, the effectiveness of timber markets have not been emphasised sufficiently in the forestry strategy. In addition, in many EU countries a few large multinational companies dominate the market. It is important to remember that economically viable forestry also helps to maintain diversity, as well as social and cultural sustainability. Sufficiently profitable forestry helps to ensure that all aspects of sustainable forestry are taken into account. This means that part of the price of wood as a raw material

is redirected back into maintaining the ecological and social balance of forests. **Non-wood forest products** such as cork, mushrooms and berries are also important sources of revenue. (European Economic and Social Committee 2000:3)

Contextual information:

The cited paragraph appears under the subheading “Future challenges to forestry in the EU.”

Analysis:

The document points out that “sufficiently profitable forestry helps to ensure that all aspects of sustainable forestry are taken into account,” but simply refers to NWFPs as “important sources of revenue”. With this quote in mind, it could be argued that it (if only vaguely) promotes NWFP activity within Europe (the document being related to the EU’s forestry strategy), but it says nothing that could be seen as promoting production in places outside Europe or importation of NWFPs to the EU.

Document title: *COMMUNICATION FROM THE COMMISSION TO THE COUNCIL on the compendium providing policy guidelines in specific areas or sectors of cooperation to be approved by the Community within the ACP-EC Council of Ministers*

Date: July 5, 2000

CELEX: 52000DC0424

Paragraph (1/1):

Improve the efficiency of utilisation and processing of wood and **non-wood forest products**, through equitable and comprehensive approaches, and support measures to increase the share of tropical timber and timber products from sustainable sources within the overall production of this sector (European Commission 2000:14)

Contextual information:

The document says that the “present compendium of texts on co-operation strategies is intended to provide detailed reference texts as regards objectives,

policy orientations and operational guidelines in specific areas or sectors of co-operation” (2000:8).

Under the subsection “Forestry,” it states that “forests play an important role in ensuring the environmental, social and economic sustainability in many developing countries” and that “addressing underlying causes of forest degradation and deforestation implies being active in other sectors indirectly having impacts on forests (good governance, land use planning, poverty, trade and marketing, environment, macro-economic policies, etc.)” (2000:13). Under the same subsection, the document states that “co-operation in this sector shall give priority to activities to,” among other things, what is described in the cited paragraph (2000:14).

Analysis:

The document does say that trade is one of the sectors in which the EU needs to be active in order to address “underlying causes of forest degradation and deforestation,” but a palpable connection between this statement and strengthening imports of NWFPs is not made. The intent to “improve the efficiency of utilisation and processing of wood and non-wood forest products” does however seem to promote NWFP production in developing countries (to which the text refers).

Document title: *Commission staff working document - Annex to the Communication on the implementation of the EU Forestry Strategy*

Date: March 10, 2005

CELEX: 52005SC0333

Paragraph (1/1):

Besides wood, forests produce many other products, such as cork, resins, medicinal plants, mushrooms and berries. Cork is one of the most important **non-wood forest products** in the European Union, with approximately 1.7 million ha of cork oak forests accounting for 80% of the worldwide production of cork. In addition, almost 100% of the manufactured output of cork originates in the EU. (European Commission 2005:5)

Contextual information:

The cited paragraph appears under the topic “The forest sector is one of the most important economic sectors within the EU.”

Analysis:

The cited paragraph simply refers to cork as one of the EU’s most important NWFPs. It makes no statement that could be taken to promote imports of NWFPs, nor promote production of such products outside or within Europe.

Document title: *REGULATION (EC) No 2494/2000 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 7 November 2000 on measures to promote the conservation and sustainable management of tropical forests and other forests in developing countries*

Date: December 28, 2005

CELEX: 02000R2494-20051228⁶

Paragraph (1/3):

promoting the production and use of wood and **non-wood forest products** from sustainably managed resources (European Parliament and Council of the European Union 2005:4)

Contextual information:

Article 1 of the regulation states that the “[European] Community shall provide financial assistance and appropriate expertise to promote the conservation and sustainable management of tropical forests and other forests in developing countries, so as to meet the economic, social and environmental demands placed on forests at local, national and global levels” (2005:3). Article 3 lists activities “to be carried out under this Regulation,” where the cited paragraph is included (2005:4).

Paragraph (2/3):

sustainable forest management and utilisation to provide economic, social and environmental benefits and including, inter alia, forest certification— taking account of the different management conditions for small and large forest

⁶ There are earlier documents, related to this one, employing similar or identical language in reference to non-wood forest products. The earliest related document dates back to March 29, 1999. The documents are either amendments (number 52000PC0054), proposals (numbers 51999PC0041 and 51999AP0237), regulation (number 32000R2494), resolutions (number 51999AP0237), or express a common position (number 52000AG0014).

areas— and environmentally sound harvesting of both wood and **non-wood forest products** and natural and assisted forest regeneration (2005:4–5)

Contextual information:

Article 4 states that “activities to be carried out under this Regulation shall address in particular ... development of appropriate national and international forest policy frameworks based on realistic valuation of forests, which include land use planning, equitable trade in sustainably produced forest products, legal and fiscal measures, institution building, support to the private sector and support to self-development of forest-dependent people to shape their own social, economic and cultural development. These shall take into account other sectoral policies which have an impact on forests and the interests and customary rights of forest-dependent people” (2005:4). Activities should also “address in particular,” among other aspects, the content of the cited paragraph (2005:4).

Paragraph (3/3):

economic viability of sustainable forest management through more efficient utilisation of forest products and technical improvements of downstream activities related to the forest sector such as small and medium scale processing and marketing of wood and **nonwood forest products**, the sustainable use of wood as an energy source and the promotion of alternatives to agricultural practices based on forest clearing (2005:5)

Contextual information:

The cited paragraph appears in the same context as the one previously cited, as aspects that activities should “address in particular” (2005:4).

Analysis:

Although not mentioning specific policy to accomplish such goal, the first paragraph cited in this document explicitly mentions “promoting the production and use of” NWFPs (together with wooden products). The document is aimed at tropical forests and “forests in developing countries” specifically, but makes no statement in support of promoting imports of products. The second paragraph cited in the document mentions NWFPs (together with wood products) in direct relation to

“sustainable forest management and utilisation to provide economic, social and environmental benefits,” which promotes NWFP production, but says nothing of promoting imports of products stemming from that production. In the same manner, the third paragraph cited mentions “economic viability of sustainable forest management through ... technical improvements of downstream activities ... such as small and medium scale processing and marketing” of NWFPs (together with wood products), which promotes the production of NWFPs but not necessarily the importation of them.

Document title: *Opinion of the European Economic and Social Committee on the ‘Communication from the Commission to the Council and the European Parliament — Reporting on the implementation of the EU Forestry Strategy’*

Date: February 3, 2006

CELEX: 52005AE1252

Paragraph (1/1):

The employment effect of forestry is not limited to the wood-processing sector, but extends also to **non-wood forest products** and other biological products from forests. **Non-wood forest products**, such as cork, mushrooms and berries, as well as green tourism and hunting-related activities, are significant sources of income. New jobs and sources of income can also be created by developing the environmental and recreational services provided by forests. (European Economic and Social Committee 2006:5)

Contextual information:

The cited paragraph appears under the subheading “Competitiveness of the EU forestry sector and promoting employment in forestry” (2006:5).

Analysis:

The cited paragraph calls NWFPs “significant sources of income” within European forestry but, as the document deals with the EU Forest Strategy, there is no mention of promoting NWFPs of countries external to the EU.

Document title: *European Parliament resolution on the implementation of a European Union forestry strategy*

Date: November 29, 2006

CELEX: C2006/290E/04⁷

Paragraph (1/1):

Calls on the Commission to support the Member States' efforts to mobilise wood resources in forests and to overcome the structural disadvantages of smaller forestry undertakings in relation to the utilisation and marketing of their forestry products, in order to ensure the Community's long-term self-supply with regard to wood and wood products; considers, in particular, that certain obstacles to the use of wood should be removed and consideration should be given to the rules and standards governing research and development in relation to innovative uses of wood and measures to boost the skills profile; emphasises the sources of income, only partly used hitherto, offered by **non-wood forest products** such as cork, mushrooms and berries and the provision of services such as nature tourism and hunting, whereby game management plays a role which should not be neglected in the context of income diversification in some of the Member States within the meaning of Article 33, indents 4, 5, 7, 9, 10 and 11 of Regulation (EC) No 1257/1999 (European Parliament 2006:7)

Contextual information:

The paragraph appears under the subsection “Strategy element 8: Promoting competitiveness, employment and income in the forest-based sector” (2006:7).

Analysis:

The European Parliament calls for support for “Member States' efforts to mobilise wood resources in forests and to overcome the structural disadvantages of smaller forestry undertakings” and “emphasises the sources of income, only partly used hitherto, offered by non-wood forest products.” However, as the document is

⁷ There is an identical document published with CELEX number 52006IP0068. According to the database EUR-Lex, the older document was marked according to “date of vote” (February 16, 2006), while the document presented here was labeled according to “date of publication.” The documents are identical in content.

related to the EU's forest strategy, it only encourages European NWFP activity, making no mention of foreign NWFPs.

Document title: *European Parliament resolution of 11 May 2011 on the Commission Green Paper on forest protection and information in the EU: preparing forests for climate change (2010/2106(INI))*

Date: December 7, 2012

CELEX: 52011IP0226

Paragraph (1/1):

Calls on the Commission to proceed with the drafting of a White Paper on Forest Protection in the EU, taking into account the results of the public consultation on the Green Paper, the widely perceived need to be prepared for climate change, the policy options study and the adaptation options study; considers that the White Paper, in addition to confirming the contribution of forests to the economy through wood and **non-wood forest products** and services, should focus on maintaining and increasing European forests, as they help European societies to mitigate climate change and adapt to its effects; considers further that a higher level of protection must be ensured for high-quality habitats and protective forests with functions in (European Parliament 2012:8)

Contextual information:

The “Green Paper” referred to mentions “non-wood” in the following context:

In addition to wood products, **non-wood** goods and services provide, in some European regions, more revenue than wood sales. Innovative methods for the valuation of non marketed forest products and services have been investigated by the Commission. Biodiversity protection, recreation, carbon sequestration and watershed services are the most important non-market services but are generally unrewarded due to the fact that they often have the status of public goods. (European Commission 2010:7)

Analysis:

Beyond “confirming the contribution of forests to the economy through wood and non-wood forest products and services,” the document says little about increasing production or trade.

Document title: *A new EU Forest Strategy: for forests and the forest-based sector*⁸

Date: September 20, 2013

CELEX: 52013SC0342

Paragraph (1/1):

Forest-based industries: Industries downstream from forests, principally woodprocessing but also others based on e.g. **non-wood forest products** (cork, resin, et al.). It includes woodworking, pulp & paper manufacture and converting, and printing (European Commission 2013a:94)

Contextual information:

The cited paragraph appears in “Annex 1: Definitions” and gives a definition of the term “forest-based industries” (2013a:94).

Analysis:

Nothing more than a definition of “forest-based industries” meant for the EU Forest Strategy, where NWFPs are included in addition to wood products.

Document title: *A new EU Forest Strategy: for forests and the forest-based sector*⁹

Date: September 20, 2013

CELEX: 52013DC0659

Paragraph (1/1):

Thus, forest-based biomass, together with **non-wood forest products**, which are gaining market interest, provide opportunities to maintain or create jobs and diversify income in a low-carbon, green economy. (European Commission 2013b:8)

Contextual information:

⁸ Labeled as a “staff working document” (p. 1).

⁹ Labeled as a “communication” (p. 1).

The cited paragraph appears under the subheading “Fostering the competitiveness and sustainability of the EU’s Forest-based Industries, bio-energy and the wider green economy” (2013b:7). Under the subheading “Strategic orientations” it is stated that the “Commission will, together with Member States and stakeholders ... Facilitate access to third markets for EU Forest-based Industry products and raw materials via bilateral trade agreements, and by improving information on import conditions and raw material exports” (2013b:8).

Analysis:

The paragraph referring to NWFPs includes such products within the broader category “forest-based biomass,” which in turn is said to “provide opportunities to maintain or create jobs and diversify income in a low-carbon, green economy.” Keeping in mind that the document is related to the EU’s forest strategy, it could be interpreted as promoting European NWFP activity. In the same manner, the “strategic orientation” to “facilitate access to third markets for EU Forest-based Industry products and raw materials” could be interpreted as encouraging NWFP exports, together with other forest products, to countries outside the EU. The document seems inclined towards promoting EU production and exports, not the contrary.

Document title: *European Parliament resolution of 28 April 2015 on ‘A new EU Forest Strategy: for forests and the forest-based sector’ (2014/2223(INI))*

Date: September 21, 2016

CELEX: 52015IP0109

Paragraph (1/2):

Highlights the importance of other forest-related activities, e.g. the harvesting of **non-wood forest products** such as mushrooms or soft fruit, as well as grazing and beekeeping (European Parliament 2016:4)

Contextual information:

The cited paragraph appears under the heading “General — the importance of forests, forestry and forest-based sector for the economy and society” (2016:2). The first paragraph of that heading says that the European Parliament “welcomes

the Commission communication on a new EU forest strategy and the accompanying working documents, and stresses that an EU forest strategy must focus on the sustainable management of forests and their multifunctional role from the economic, social and environmental viewpoints and must ensure better coordination and communication of Community policies directly or indirectly linked to forestry; points out, in this context, that an increasing number of European policy initiatives in areas such as economic and employment policy, energy policy and environmental and climate policy require a greater contribution from the forestry sector” (2016:2).

Paragraph (2/2):

Considers that, in view of the Commission’s list of priorities on growth, employment and investment, priority should also be given in implementing the new EU forest strategy to promoting the competitiveness and sustainability of the forest sector, supporting both rural and urban areas, expanding the knowledge basis, protecting forests and preserving their ecosystems, promoting coordination and communication, and increasing the sustainable use of wood and **non-wood forest products** (2016:10)

Contextual information:

Citation appears under the heading “General — the importance of forests, forestry and forest-based sector for the economy and society” (2016:2), subheading “Implementation and reporting” (2016:10).

Analysis:

The document includes two paragraphs where NWFPs are mentioned. The first “highlights the importance of other forest-related activities, e.g. the harvesting of non-wood forest products,” while the second says that “priority should also be given in implementing the new EU forest strategy to ... increasing the sustainable use of wood and non-wood forest products.” Both of these formulations could be read as supporting NWFP activities, but are limited to the European forestry sector as the statements are related to the EU’s forest strategy.

Document title: *DIRECTIVE (EU) 2018/2001 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 11 December 2018 on the promotion of the use of energy from renewable sources*

Date: December 21, 2018

CELEX: 32018L2001¹⁰

Paragraph 1/1:

Forests should be considered to be biodiverse in accordance with the sustainability criteria where they are primary forests in accordance with the definition used by the Food and Agriculture Organisation of the United Nations (FAO) in its Global Forest Resource Assessment, or where they are protected by national nature protection law. Areas where the collection of **non-wood forest products** occurs should be considered to be biodiverse forests, provided that the human impact is small. Other types of forest as defined by the FAO, such as modified natural forests, semi-natural forests and plantations, should not be considered to be primary (European Parliament and Council of the European Union 2018:15)

Contextual information:

The cited paragraph appears in the context of biofuel production and protection of biodiverse areas. The preceding paragraph states the following:

The production of agricultural raw material for biofuels, bioliquids and biomass fuels, and the incentives provided for in this Directive to promote their use, should not have the effect of encouraging the destruction of biodiverse lands. Such finite resources, recognised in various international instruments to be of universal value, should be preserved. It is therefore necessary to provide sustainability and greenhouse gas emissions saving criteria ensuring that biofuels, bioliquids and biomass fuels qualify for the

¹⁰ There are earlier documents, related to this one, employing similar or identical language in reference to non-wood forest products. The earliest related document dates back to June 5, 2009. The documents are either amendments (number 52018AP0009), directives (numbers 32009L0028, 32009L0030, 02009L0028-20130701, 02009L0028-20151005, PE 48 2018 INIT, and PE 48 2018 REV 1), or proposals (numbers 52016PC0767, 52016PC0767R(01), ST 15120 2016 REV 1 - 2016/0382 (OLP), ST 8697 2017 INIT - 2016/0382 (OLP), ST 8697 2017 REV 1 - 2016/0382 (COD), ST 8697 2017 REV 2 - 2016/0382 (COD), ST 8697 2017 REV 3 - 2016/0382 (COD), ST 8697 2017 REV 4 - 2016/0382 (COD), ST 8697 2017 REV 5 - 2016/0382 (COD), ST 15236 2017 INIT - 2016/0382 (COD), ST 5351 2018 INIT - 2016/0382 (COD), ST 8392 2018 INIT, and ST 14026 2018 INIT).

incentives only where it is guaranteed that agricultural raw material does not originate from biodiverse areas or, in the case of areas designated for nature protection purposes or for the protection of rare, threatened or endangered ecosystems or species, the relevant competent authority demonstrates that the production of the agricultural raw material does not interfere with such purposes. (2018:15)

Analysis:

The paragraph only mentions NWFPs in connection with biodiverse forest areas, from where biofuels and bioliquids cannot stem if they are to qualify for incentives under sustainability criteria. It is not concerned with the promotion of trade in NWFPs, but with protecting biodiversity.

Document title: *Evaluation of the 7th Environment Action Programme to 2020 "Living well, within the limits of our planet"*

Date: May 15, 2019

CELEX: 52019SC0181

Paragraph (1/1):

The use and management of forest resources varies greatly across Europe and depends on factors such as local social ownership and economic situations, history, traditions and government policies both within and outside the forest ecosystems, as well as available markets for wood and **non-wood forest products** and services. Europe' s forests thus reflect this variety of economic, social and environmental conditions in the region. (European Commission 2019:31)

Contextual information:

Report assessing the implementation of the EU forest strategy. The cited paragraph appears under the heading “PRIORITY OBJECTIVE 1: To protect, conserve and enhance the Union’s natural capital” (2019:6).

Analysis:

The cited paragraph says that the “use and management of forest resources varies greatly across Europe and depends on factors such as ... as available markets

for wood and non-wood forest products and services,” but makes no connection to strengthening production of said products or facilitating such imports from other countries.

5. Discussion & recommendations

Only two of the documents analyzed above can be said to promote NWFP activity and production in countries outside the EU, and only one can be said to promote imports of NWFPs (although not explicitly). There are formulations that can be taken to support increased production of NWFPs in connection with the EU's forest strategy, but that support is limited to Europe. The only document that (indirectly) supports strengthening NWFP importation to Europe dates back to 1996, and those that can be read as supporting NWFP production in non-EU countries are from 2000 and 2005. None of these documents are recent.

Where NWFPs are mentioned, it is often together with wood products, where they are simply considered a subcategory of “forest products”—not as a type of forest produce that merits attention on its own. Half of the documents presented in this article mentions “non-wood forest products” only in connection with “wood products”—the most common such formulation being “wood and non-wood forest products”—and nine of seventeen paragraphs follow this same pattern. The three documents that could be interpreted as promoting either foreign NWFP activities and/or imports mention NWFPs in this context. Potential policy emanating from such wording would most likely not target NWFPs in particular, but forest products in general (though produced in a sustainable manner in accordance with the criteria set out by the EU). The word “trade” appears 125 times in the documents presented, but never in the same paragraph as “non-wood forest products.”

Where attention is paid to NWFPs, be it as a particular kind of sustainable commercial activity or simply as another type of forest product, there are no concrete policy suggestions to explicitly promote trade in such products. The results of the analysis of the documents selected for this research show that little attention is paid to NWFPs as policy material in themselves, the focus being on forestry and forest products in general: “wood” and “non-wood” being treated equally where trade and commercial activity are concerned.

Considering the importance of NWFP activities as a sustainable commercial alternative to sectors reliant on deforestation, the EU should formulate policy that gives special—but not necessarily exclusive—attention to NWFP activity in countries where deforestation is a major threat to global climate goals, and highlights such activities as a separate category of commerce—not as just another

forest product—and a preferred way of decreasing deforestation while maintaining and growing a reliable source of income for forest regions. Such policy would constitute a formidable contribution to the EU’s climate targets and the UN’s Sustainable Development Goals.

The literature demonstrates that European forest policy is normally set on national or subnational levels, but the EU can influence and set policy regarding international trade. This can either be through proposals or other means, such as dialog and cooperation with other countries. By treating NWFPs as a separate concern meriting special attention, it can influence the policy member states adhere to nationally. Imports of NWFPs do not necessarily have to constitute competition and provoke enmity among EU members. On the contrary, exports that come from other countries often differ decidedly from the type of NWFPs produced in European climate.

The FAO emphasizes that “innovative production and marketing concepts must be explored to render [NWFPs] a vital component of modern society” and that “care needs to be taken that steps towards a bioeconomy support the multipurpose use of forests rather than a single use, and sustainability must be assessed to avoid overexploitation of the resource” (2017:12). This extends not just to the EU’s internal market, but to cross-border trade. Concrete policy or action in this direction could take various forms, looking over taxation and tariffs being some of the obvious ones. Socioeconomic criteria could be used to decide which products to prioritize, giving attention to trade policy that could improve circumstances for small producers and tackle deforestation, while improving the ecological and environmental situation. As long as policy focuses on types of products, and not particular producers, it is allowed within the framework of the WTO. A clear link should be made in promoting NWFP policy between the benefits emanating from such an undertaking and the objectives of the EU’s bioeconomy strategy.

A precondition to be able to formulate effective policy is reliable and representative data. The literature is clear in stating that both European and global data on trade in NWFPs is lacking at best. Among reasons cited are high costs and non-homogenous or inconsistent terminology for NWFPs. Considering the undervaluation of NWFP activity just within Europe, developing more accurate statistics would most likely lead to increased attention being paid to NWFPs and, corollary, to the value of the data itself. Like the global trend, European NWFP

harvesters are usually concentrated to poorer communities, specifically to more recent member states in Eastern and Southern Europe. An investment in better data would be an investment by wealthier member states in less developed EU economies, thus not just contributing to the bioeconomy goals, but to a more equal and prosperous Union as a whole. From a cost perspective, financing the development of better data could be a smart move. Synchronized with international efforts, it would make a useful contribution to global trade statistics.

Burgener concludes that NWFPs “are probably not ideal for certification programmes as the products are often traded on a small scale in local markets and where they are traded internationally it is often for a specific industry and also on a relatively small scale” (2007:42). An opposing argument is that “the introduction of standards and certification schemes can help overcome perceptions that NWFPs lack quality, supply stability and traceability of origin” (FAO 2017:10). For certification to be helpful in promoting sustainability goals, assistance would be needed to help small producers to adapt to stricter requirements. An initiative such as the 1996 call for proposals, presented in the previous section, could be a sound step in that direction. Project proposals should be aimed at helping small producers adapt to stricter requirements. Phytosanitary regulation, although necessary, is a major obstacle to small producers who do not have the means to adapt to changing standards. The same kind of assistance would also be useful in this area.

Corruption is another obstacle in NWFP value chains and an example of policy that need not be specifically geared towards NWFPs. Beyond the EU’s own anti-corruption work, strengthening international efforts to combat corruption (see GRECO n.d.) would also help NWFP trade. The same goes for dialog and cooperation on a range of issues, as NWFPs are cross-sectoral and should “be recognized in other policy fields such as nature conservation, food, health, recreation, trade and industry” (FAO 2017:10).

Ultimately, in taking action—whether it is through policy, dialog, or cooperation—it is crucial to involve a wide range of stakeholders. Just as NWFPs should be recognized in various policy fields, stakeholders from various sectors must be included for initiatives to gain wide acceptance. For policy to be effective, it needs to be tailored to local conditions, taking into account small producers and their capacity. In looking to traditional practices, it is important to “ensure clear definition of rights, and harmonize policy with customary rights and informal

traditions,” as “informal institutions and unwritten traditions shape people’s collection practices, places, times and species and frequently have a stronger impact on the value chain than formal rules” (FAO 2017:11). It is likely that local communities will be discouraged from participation if such aspects are not taken into account. NWFP advocacy groups should be encouraged and integrated into the policy-making process, but as governments tend to prefer professionally organized trade groups, it is necessary to keep in mind that there are many types of organizing that do not focus solely on NWFPs, for example indigenous communities, that must also be included.

6. Conclusions

The article set out to investigate the hypothesis that EU policy paid little attention to international trade in NWFPs, in particular foreign production and imports into the EU, despite it being beneficial to the Europe's environmental agenda. It did so by examining public records pertaining to the EU's legislative branches that include the term "non-wood forest products" and analyzing the context, in relation to trade, in which the term appears. When analyzing the documents, the questions "Does the paragraph, and the context in which it appears within the document examined, promote NWFP production in countries outside the EU?" and "Does the paragraph, and the context in which it appears within the document examined, promote NWFP imports from countries outside the EU?" were asked. The analysis allowed for a broader interpretation of the word "promote," in the sense that it did not need to entail concrete policy, but could be in the form of a perceived attitude, stance, or opinion.

Only one document, of the 14 presented under "Findings," was interpreted as responding affirmatively to both questions. Two documents were deemed favorable to promoting production of NWFPs in countries outside the EU. Other documents did support NWFP production, but within the EU. Half the documents (including the three just mentioned) grouped non-wood products together with wood products, demonstrating that even where NWFPs benefit, it is usually not for their particular advantage (being "non-wood"), but for being a subcategory of "forest products."

The article found that the hypothesis that there is little EU policy geared toward international trade in NWFPs was correct. Not only did the research indicate a lack of policy, but a lack of discussion regarding the subject in general. This is noteworthy because such policy would fit well into the EU's bioeconomy strategy (its plan for transitioning to a "green" economy), help combat climate change and deforestation—two topics that are high on European leaders' agenda—and contribute significantly to the UN's Sustainable Development Goals. Policy to accomplish this could take various forms and the article sets forward several suggestions:

- Review tariffs and taxes related to NWFPs to incentivize trade. Emphasis could be given to products deemed important from a socioeconomic and environmental perspective.
- Improve classification and collection methods for data on NWFP trade. Accurate data is vital in formulating effective policy.
- Provide assistance for small producers to overcome common obstacles in adopting to global value chains, especially high phytosanitary standards and certification requirements.
- Support international anti-corruption efforts, such as combatting bribery in the various stages of global value chains.
- Involve a wide range of stakeholders from the wide range of sectors related to NWFP value chains, including small producers and local communities.

Finally, a suggestion for future research would be to examine documents that include related terms, like “non-timber forest products” (described in the literature review). Such investigations could cast additional light on the relationship between sustainable forest products and trade. Similar inquiries on national, and even subnational, levels could also make for useful contributions.

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