

World Bank's Turkey Forest Policy Note: All Analysis, No Action?



Background:

Turkey has some 21.7 million ha. of forest area, ranking 32nd in the world and covering 27.6% of its land area. However, some 43% of its forests are classed as degraded and in need of rehabilitation.

Accordingly, improving management of Turkey's forests can have significant impacts in Turkey and beyond, and the Turkey [Forest Policy Note](#) (FPN)ⁱ offers important information for understanding Turkey's forest

governance. Key points:

- **Deficient Laws:** Turkey's main forest legislation was framed over half a century ago and despite many amendments suffers from deficiencies including (a) lack of uniformity in the text due to repeated changes, (b) definition of forests at variance with FAO, (c) private sector largely being ignored, (d) insufficient importance given to NWFPs (Non-Wood Forest Products), and (e) overlap and conflict with other legislation. Other areas where the law can be improved relate to the application of SFM (Sustainable Forest Management), user rights for NWFPs, methods of sale for wood-based forest products and support for initiatives within the sector. Framework legislation on nature protection, and the national biodiversity strategy and action plan, still have to be adopted. The draft Nature Protection Law is not in line with the EU acquis.
- **Poor Forest Management:** The General Directorate of Forestry (GDF) is a centrally controlled organization that essentially sets its own targets, monitors its own performance, audits itself through an internal audit, and reports on itself to the Government and public. A simple benchmarking exercise comparing the GDF 2014 output with state owned forest organizations in Ireland, Poland, and Romania shows that it is the only loss-making (annual loss of US\$ 411.28 million) entity and the only entity not paying the state a dividend for the use of forest assets. The GDF budget is almost totally reliant (90%) on roundwood sales, and the trend is for this dependency to increase. GDF's reliance on forest product revenues and Treasury's contribution to make up the difference leaves the GDF overly exposed to budget fluctuations and timber markets.

- **Successful Projects (But Need a Policy Link):** Two World Bank watershed rehabilitation projects (co-financed with Turkey's government) and an FAO technical co-operation project (TCP) have been implemented so that Turkey has solid experience in watershed management practices. The Eastern Anatolia Watershed Rehabilitation project was implemented in 11 provinces (in 66 catchments) over a ten-year period (1993-2003). The Anatolia Watershed Rehabilitation project was implemented in 6 provinces. The project outcomes included the rehabilitation of degraded natural resources, particularly degraded forests and pastures in uplands, soil protection and erosion control in mountainous micro catchments, improvement of the livelihood of rural communities, and innovative income generating interventions. More specifics on how these projects worked would be useful in the policy discussion.

Forest Policy Needs:

The Turkey FPN provides significant information on Turkey's forest sector and the sectoral work being done by the United Nations and EU. As to what the World Bank is doing, apart from the two completed watershed rehabilitation projects, it provides only broad analysis/recommendations to improve the Turkish forest sector's managementⁱⁱ, without clarifying what the World Bank is doing or proposing to implement these. The Bank notes that the FPN "is not a forest policy *per se*, although it could serve as an input to a forest policy formulation process." The FPN analyze the status and policy needs of Turkey's forest sector as follows:

- **Some Reforms Underway:** Turkey is already addressing a range of regulatory and institutional reforms in the environment and forestry sectors and prioritizing investment programs in infrastructure, pollution mitigation, and afforestation. Measures to address these challenges are now becoming a priority for the Government.
- **Management Challenges:** Turkey and the GDF in particular will have to address a number of challenges around: a. Forest Resource Information; b. Forest Legislation; c. Improving Competitiveness; d. Enhanced Wood Supply; e. Sustainability of Forest Resources; and f. the Role of the State in Turkey's forests.
- **Climate Issues:** Turkey became a party to the Kyoto Protocol in 2009, but is not yet subject to emission reduction or limitation obligations. In the medium term, however, it will be important for Turkey to fully address the potential impacts of climate change in future afforestation and forest rehabilitation works through planting more drought-resistant species. There should be further studies to more fully understand the impacts at an ecosystem level so that mitigating measures can be developed and put in place thereby ensuring the ongoing provision of the complete range of environmental services from forests
- **Biodiversity Needs:** There is the potential to sustain and improve forest biodiversity, by expanding protected areas and the use of integrated management in forests outside protected

areas. The NFI (National Forest Inventory) will help in the monitoring and reporting of biodiversity within forests.

- **Road Impacts:** While there is awareness of the environmental impact of road construction, there is no EIA requirement and no national best practice environmental guidance. The general perception in the sector is that road standards are appropriate, but there is a need to improve construction techniques. (The FPN does not offer further specifics.)

Conclusion: Industry and Development Prioritized Over Environment and Sustainability

Given the importance and fragility of Turkey's forest ecosystemsⁱⁱⁱ, it is surprising that this FPN lacks emphasis on environment, conservation, and sustainability. Instead, the document focuses on industry and development, without regard for the extent to which these would speed up the exploitation of natural resources and biodiversity, deforestation, and pollution.

An effective FPN would address the Bank's plans for countering comprehensively the threats to Turkey's forests, including habitat alteration, fragmentation, and conversion/loss, along with over-exploitation/overgrazing, illegal logging, forest fires, and air pollution (all noted in Turkey's [NBSAP](#), pp. 13-14).

This is ironic since the Bank has undertaken serious [analysis](#) of forest village populations^{iv} and the need to improve their livelihoods and forest management. One also would hope to see a more serious commitment by the Bank to financing sectoral reform, given its prior investments in the sector and ongoing engagement with Turkey, as the 6th largest [IBRD borrower](#), receiving over \$1.5 billion in new commitments in FY2018. What is the point of a sectoral analysis that does not propose programs to address the problems it identifies?

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ⁱ World Bank Group. June 2017: Turkey Forest Policy Note. World Bank, Washington, DC. © World Bank; <https://openknowledge.worldbank.org/handle/10986/28564>. License: CC BY 3.0 IGO.

ⁱⁱ The WB focuses its recommendations for improving management of Turkey's forests on four areas: 1) information sharing, 2) community involvement, 3) administrative streamlining, and 4) improving of development techniques. We generally concur these are important to address and could form the basis of a Bank program, ideally in combination with addressing the sector's broader sustainability challenges.

ⁱⁱⁱ See Turkey's National Biodiversity Strategic Action Plan (1999) and AFD's review the Natural Resources and Biodiversity Sector in Turkey (June 2016).

^{iv} This found, inter alia, that the goods and services provided by forest ecosystems are important for the 7.1 million forest villagers (close to 9% of Turkey's population) who are dependent on forest ecosystems

for living (industrial wood production, fuelwood production, non-timber forest production, ecotourism, water production, etc.).