

# Feedback on A Working Definition of European Wilderness and Wild Areas

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It is good to see an emphasis on the importance of natural processes in the definition. We found "*natural processes*" referred to in the protected area legislation of 19 countries in Europe, which along with 12 references to "*biocenosis*" (i.e. a living community of nature) is evidence of an understanding and a commitment to the characteristics of wild nature.

We also go along with the concept of a continuum as a useful way of understanding the spectrum of land use across Europe, and how it results in land of differing wild character. It is useful in understanding the range of protected areas that exist, and how they can be classified in the IUCN categories. We have argued that a balance in European landscapes would be for areas to exist within all possibilities of the continuum, and not just crowded around one or two categories at one end of the continuum, as is the case in Britain. The continuum also, as the document says, is the backdrop to a two-fold strategy for wilderness conservation, involving protection and restoration/rewilding. Importantly, the continuum is the context for seeing areas moved further along through restoration, of buffer zones promoted towards becoming parts of the core area, and transition zones becoming part of buffer zones.

The document is weak on defining biodiversity other than by an inference that it has a compositional attribute. Perhaps we suffer overly from the poor concept of biodiversity in Britain, as has become narrowly defined by the priorities and choices of our conservation industry. However, there is an opportunity to bring this concept alive in Europe through the context of wilderness and wild land, by basing it on the three core attributes of composition, structure, and function, a compelling approach recognized by Franklin and others in forest ecosystems (1) and expanded upon by Noss in his Indicators for Monitoring Biodiversity (2). Thus the three-dimensional structure of vegetation is central to the functioning of many natural ecosystems, and is inherent in wilderness without the need for manufacture or management. Three-dimensional structure to the full vertical range of capability of vegetation enhances habitat availability for a wide range of organisms and promotes nutrient cycling, seed dispersal, and germination.

There is some scope for interpretation that is worrying in the definition of "Rewilding" in Appendix I, in relation to allowing "*natural processes to occur (again), replacing human management and interference*"

By way of explanation, in the British context of conservation, free-ranging domestic livestock have been imbued with a role as *agents of nature* through a supposed de-domestication, and in contrast to the alternatives of mechanical methods of management, such that we are to believe that the former is natural through its comparison to the latter. This is a sleight of hand, such that it is common in these grazing projects to hear that grazing with livestock is

the most natural method of looking after the land, that it liberates the landscape, helping to generate a more naturalistic pattern of vegetation, and that it allows natural patterns of foraging to be expressed. On the latter, a number of these grazing projects track their livestock with GPS radio-collars, in a way that is analogous to methods often used to track truly wild animals. The illogic in this is revealed by the admission that livestock grazing is the chosen management method to look after protected landscapes because farming played a crucial role in shaping the habitats. It should be remembered that farming results in a simplified ecology that is widely lacking in native species that would fulfil its potential natural vegetation. This again relates to the compositional, structural and functional attributes of biodiversity.

The sleight of hand of imbuing domestic livestock as *agents of nature* characterises a number of grazing projects based in the Public Forest Estate in England. Thus Dunwich Forest in Suffolk is described by the Forestry Commission as currently undergoing a process of "*rewilding*", the long term plan being to recreate and regenerate the natural landscape that existed prior to the conifer plantations. In reality, after first felling the conifers, the northern area is being grazed by a herd of 28 Dartmoor ponies, with the aim being the creation of 320ha of wood pasture, a culturally managed landscape. It is considered that the development of the trees in this wood pasture will be dependent on regenerating broadleaves that were already seeding-in before the ponies were introduced. However, evidence from a long term study on woodland regeneration in the open in the presence of grazing is against this happening any time soon (3). Another study concluded that in homogeneous grassland, woodland regeneration is almost impossible, even with very low herbivore densities (4).

This *spontaneous outburst* of regeneration of open or scattered broad-leaf woodland in the presence of livestock grazing is the basis of Nature Development in the Netherlands where it originated. As the name suggests, it is not about protecting and conserving existing nature, but is a move to produce a "*new nature*" through a supposed de-domestication of livestock, or from back-bred domestic animals to produce *wild* surrogates, such as Heck cattle or Konick horse. That this development of "*new nature*" should have arisen in the Netherlands is hardly surprising, given it is one of the most intensively used and highly modified landscape areas in Europe. What is of course missing in this Nature Development approach are the native carnivores. While the Nature Developers may vary the number of herbivores, they seem incapable of understanding the role of predators in regulating the activity of herbivores, and especially the spatial variation of herbivore pressure that is induced by the physical presence of carnivores.

On the basis of the forgoing analysis, we strongly agree with the prohibition of livestock grazing in Core Areas that is clearly stated in *Livestock grazing* in the Criteria for wilderness, related to zones (Section 8, Appendix II).

The grazing exception for bona fide indigenous peoples of Nordic countries puts a spotlight on protected areas classified under IUCN Category VI "Protected Area with sustainable use of natural resources", which is the case for the Sami wilderness areas in Finland, and whether they are compatible with other aspects of the wilderness definition. It also begs the question of whether it is native species that are being grazed under this exception.

On that latter point, we also strongly agree on the stricture in the Criteria under *Restoration/rewilding* that wildlife reintroductions and re-stockings are made using indigenous species only.

There are many examples of restrictions on activities in the legislation for strictly protected areas across Europe that this wilderness definition is supportive of. A snapshot of those restrictions is given in the Appendix below.

NOTE: the Section numbering in Appendix II is faulty (1-13, then 9-14)

(1) Franklin, J. F and others (1981) Ecological characteristics of old-growth Douglas-fir forests. USDA Forest Service General Technical Report PNW-1 18. Pacific North-west Forest and Range Experiment Station, Portland, Oregon.

[http://www.fs.fed.us/pnw/publications/pnw\\_gtr118/pnw\\_gtr118a.pdf](http://www.fs.fed.us/pnw/publications/pnw_gtr118/pnw_gtr118a.pdf)

(2) Noss, R.F. (1990) Indicators for Monitoring Biodiversity: A Hierarchical Approach. Conservation Biology 4:355-364

(3) Kuiters, A.T. & Slim, P.A (2003) Tree colonisation of abandoned arable land after 27 years of horse-grazing: the role of bramble as a facilitator of oak wood regeneration. Forest Ecology and Management 181:239–251

(4) Van Uytvanck, J and others (2008) Restoration of woodpasture on former agricultural land: The importance of safe sites and time gaps before grazing for tree seedlings. Biological Conservation 141:78-88

<http://www.inbo.be/docupload/3597.pdf>

## Appendix - EUROPEAN COUNTRIES WITH STRICTLY PROTECTED AREAS IN LEGISLATION

Albania - Strict nature reserve  
No cutting of trees and shrubs, hunting and fishing, grazing, livestock, extraction of minerals and peat  
Armenia – State Reserve  
No logging, hunting and fishing, cattle grazing, exploitation of water resources  
Azerbaijan - State Reserve  
No collection of firewood, hunting and fishing, use of pastures for economic purposes, use of ground and underground waters for agricultural, industrial, hydro-energy, water transport and other economic purposes  
Belarus – Reserve  
Fully withdrawn from economic turnover  
Bulgaria - Reserve  
All activities are prohibited in the reserves  
Croatia - Strict Reserve

No economic and other activities  
Czech Republic – National nature reserve  
Prohibited to alter the preserved natural environment in contradiction with the detailed conditions of protection of the national nature reserve.  
Denmark – Conservation order  
conservation order may contain such provisions, including injunctions and prohibitions of land use that are deemed necessary for the conservation objectives to be achieved  
Estonia - Strict Nature Reserve  
All human activities prohibited  
France – Integral State Biological Reserve  
prohibit or subject to special conditions the activities likely to jeopardize the achievement of the objectives

Georgia – State Reserve  
 No destruction and modifying of natural ecosystems, exploitation or disturbance of any natural resources

Greece – Absolute nature protection area  
 Any activity prohibited

Italy – State nature reserve  
 natural environment is preserved in its entirety

Latvia - Strict Nature Reserve  
 All natural resources are completely excluded from economic and other activities

Liechtenstein – Forest reserves  
 undisturbed, dynamic development be left in which all human activities are undesirable

Lithuania – Strict state reserve  
 termination of economic activities to ensure the unaffected course of natural processes

Macedonia – Strict Natural Reserve  
 protection, with no deliberate influence whatsoever on the natural processes in the habitat or on the species populations

Montenegro – Strict and Special Nature Reserves  
 Prohibited actions and activities that may violate the properties that were declared a protected natural resource (Picking and destroying plants, disturbing, capturing and killing of animals, introduction of new biological species, land-improvement works, various forms of economic and other use, etc.).

Moldova - Scientific Reserve  
 No grazing, hunting, fishing, prospecting and extraction of natural resources

Norway – Nature reserve  
 absolute protection from all activity, projects and access or passage

Portugal – Integral reserve  
 full protection areas, called reserves integrals, with the aim of maintaining the natural processes in a dynamic and evolving state, without the development of human activities

Romania - Scientific Reserve  
 any human activity is prohibited

Russia – State natural reserve  
 No economic use of specially protected natural complexes and objects

Serbia – Strict and Special Nature Reserve  
 Forbidden to perform actions and activities and perform activities that may damage the properties for which they are declared protected natural right (picking and destroying plants harassment, capture and killing of animals, introduction of new biological species, amelioration works, various forms of commercial and other use and etc.).

Slovakia – nature reserve  
 No clear-cutting, trapping, killing or hunting animals, grazing animals

Slovenia - Strict Nature Reserve  
 No interventions or pursue the activities that undermine the preservation of the protected area

Spain

Asturias – Intergal Nature Reserve  
 no exploitation of resources

Catalonia – Intergal nature Reserve  
 preserve from any human intervention all natural systems and their evolution

Navarre - Integral Reserve  
 All activities are prohibited

Svarlbad – nature reserve  
 totally protected

Sweden – reserves  
 No logging, hunting and fishing

Switzerland – National Park Core Area  
 protected from all human intervention

Turkey – Nature conservation areas  
 absolute protection

Ukraine – State reserve  
 No economic and other activities contrary to the intended use of the reserve