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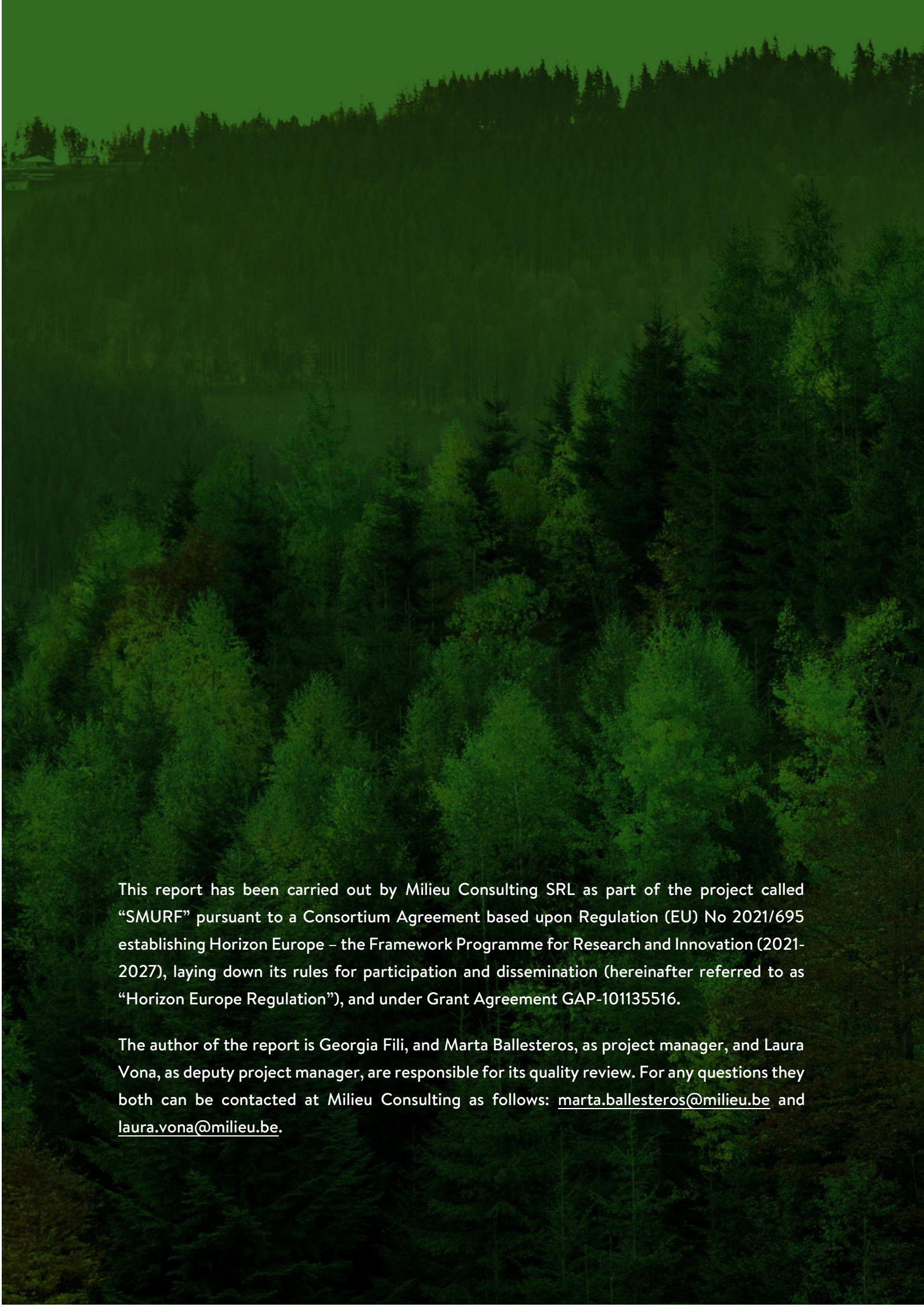
Legal and regulatory framework applicable to Small Forest Owners and Sustainable Forest Management

Country Fact Sheet
Cyprus

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THE FOREST OWNERS' PROJECT

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Legal and regulatory framework applicable to Small Forest Owners and Sustainable Forest Management (SMURF) - WP2

Executive Summary

Forest management in Cyprus is primarily regulated by Cypriot Forest Law, Law No. 25(I)/2012 and its Amendments. This Law focuses on the management and protection of public, community and private forests, as well as on the establishment of a national forest policy, the regulation of the use of forest products, the prevention and suppression of violations, and the creation of institutions, such as the Forest Advisory Board. However, the focus is placed on public forests and provisions on private forests are more limited.

The forest ownership structure in Cyprus is divided between public and private. Most of the Cypriot forests are public. The forest ownership structure is governed by a cadastral registration system. Public forests are geographically defined through collaboration between the Department of Forests and the Department of Cadastre and Land Surveying. Private forests de facto lack a specific forest registry, as the Register of Owners of Private Forests established under the law remains unused due to a lack of owner participation. Private forest land is instead recorded in the general land cadastre, often categorised as agricultural land, which creates gaps in the legal framework for sustainable forest management, enforcement, and monitoring of ownership obligations.

Under Cypriot law, forest owners have the right to form organisations to promote sustainable forest management, delegate forest management to the Department of Forests, and request technical support from the Director of the Department. Their obligations include maintaining sustainable management plans, keeping records of forest activities, and submitting data upon request. Forest managers, primarily the Director of the Department of Forests, are responsible for conserving and sustainably managing public and private forests, implementing forest management plans, preventing and suppressing wildfires, and ensuring compliance with regulations. Forest holders, such as forestry enterprises, must maintain records of transactions and provide data to authorities when required. These rights and obligations collectively aim to balance forest use with conservation.

Sustainable forest management (SFM) is not specifically defined in Cyprus. However, Cyprus has in practice taken the Helsinki definition into account through its set of Criteria and Indicators for Sustainable Forest Management. SFM is supported through policies such as the National Forest Policy and forest management plans, which aim to balance biodiversity conservation, climate adaptation, and sustainable resource use. However, certification programs like FSC and PEFC are not adopted in Cyprus, and no national contact points or offices for these systems are registered in the country.

In Cyprus, there are no financial incentives, subsidies, or tax benefits for private forest management or biodiversity conservation. Forest owners and enterprises can register under

existing provisions, but no specific taxes apply to forest ownership or forestry activities, limiting support for sustainable forest management. Regarding the forest land market, no specific legal requirements or restrictions have been established for the sale or purchase of private forest land. As regards public forest land, it belongs exclusively to the State and is not subject to sale.

Key recommendations in order to respond to the gaps in Cypriot legislation include setting specific biodiversity conservation and climate change adaptation targets, introducing financial incentives for sustainable forest management, and addressing gaps in forest land market legislation to prevent fragmentation. Improved monitoring and reporting frameworks, stronger enforcement mechanisms for private forests, and better integration of forest legislation with broader environmental policies are needed.

Introduction

This is a Horizon project with a strong research approach. The name of the project is 'Sustainable Management models and value chains for small Forests' known as SMURF with the reference HORIZON-CL6-2023-CIRCBIO-01.

The general objective is to provide an analysis of the legal and regulatory framework in EU Member States applicable to small forest owners (SFO) in their practices aiming to Sustainable Forest Management.

The specific project objectives are:

1. Prepare a report on the legal framework on SFO for most EU Member State.
2. Identify the basic legislation regulating SFO and the specific articles setting rights and obligations and *provide the links* to those basic and articles.
3. Define the rights and obligations for SFO in EU Member States.
4. Define the legal framework for the economic activity of SFO in EU Member States.
5. Identify the **main legal limitations or barriers** for SFO in EU Member States.
6. Identify **needs for legal reforms and propose specific legal improvements**, when considered necessary.
7. Prepare a comparative analysis of the legal framework SFO in the EU Member States.

These guidelines provide the basic information for the elaboration of the report on legal framework applicable to Small Forest owners/holders. It is complemented by a pilot report showing as a model to show the level of depth of the analysis.

When using the term "legal framework" we consider:

- The organizational model of forestry and the forest value chain.
- The institutional framework, identifying the distribution of competences among the different administration levels (European, national, regional and local) and administration sectors (agriculture and rural development, environment, industry, interior, economics and others).
- The regulatory framework, identifying laws and regulations that affect forestry and the forest value chain. The key articles that set basic rules for forestry will be explicitly referred and translated into English.

The analysis will be focused on factors that affect the participation of forest holdings in the market. There is a particular interest in identifying barriers, obstacles and measures or instruments that have had a significant positive impact in the present functioning of the forest markets.

The analysis will describe the nowadays situation of the framework, although a contextual and short reference of the origin and evolution of the framework when needed for a good understanding will be included.

The analysis will consider the national legislation and will only refer to the regional legislation as a way of example to confirm the national legal framework or to show that in some regions the situation may be rather different.

The analysis will take into consideration the forest sector legislation, but not only, because the main barriers and legal limitations might be derived from the inadequacy of other sectoral laws (societal, fiscal, real state and ownership, cadastral, insurances) or requirements in some pieces of national environmental legislation. It will refer to Nature or Biodiversity Conservation law and to the Environmental Impact Assessment legislation while it might also refer to relevant agriculture legislation.

1. Basic legal and regulatory framework applicable to small forest owners

1.1. Context to the legislation

Forests and woodlands in the Republic of Cyprus cover an area of 171,73 hectares in 2021, which corresponds to 19% of its territory being covered by forests.[1] These are constantly facing new challenges. The main threats facing Cyprus' forests are forest fires, biotic and abiotic factors, illegal logging and grazing, and building infrastructure for various types of development.

The Forestry Department of Ministry of Agriculture, Rural Development and Environment of Cyprus is responsible for the management of public and private forests, the implementation of the National Forestry Policy and the National Forestry Programme and, overall, the implementation of forestry legislation.

1.2. Basic legal instruments

The legal system in Cyprus is based on the principles of legality, separation of powers, independence of the judiciary, and respect for and protection of fundamental human rights and freedoms. The sources of law in Cyprus are the following:

- The law of the European Union
- The Constitution of the Republic of Cyprus
- The European Union Law of the European Union
- Statutory Acts of the European Union
- Supreme Court case law
- Common Law - Principles of Surrender

The following laws and regulations relating to forests exist in the Cypriot legal system:

- Law No. 25(I)/2012, The Cypriot Forest Law
- Law No. 104(I)/2018, The Forest Law of 2018 (Amendment)
- Law No. 11(III)/2008, The International Tropical Timber Agreement (Enactment) Act 2008
- Law No. 125(I)/2010, The Law on the Implementation of the FLEGT (Forest Law Enforcement, Governance, and Trade) Voluntary Licensing Scheme for Timber Imports into the European Union 2010
- Law No. 139(I)/2013, The Law on the Control of Trade in Timber and Timber Products of 2013

[1] Eurostat Statistics

- RAA No. 132/2012, The Forestry Regulations of 2012 (Recognition of Private Forest Owners' Organisations)
- RAA No. 133/2012, The Forestry Regulations of 2012 (Permits, Use of Forest Roads, and Export of Forest Products)
- RAA No. 134/2012, The Forestry Regulations of 2012 (Disposal of Public Forest Land)
- RAA No. 346/2014, The Forestry Regulations of 2014, Amendment (Disposal of Public Forest Land)
- RAA No. 505/2014, The Forest Regulations of 2014, Amendment (Permits, Use of Forest Roads, and Export of Forest Products)
- RAA No. 103/2017, The Forest Regulations of 2017, Amendment (Permits, Use of Forest Roads, and Export of Forest Products)
- RAA No. 285/2003, The Forest Reproductive Material Production, Marketing and Control Regulations 2003
- RAA No. 202/2007, The Forest Reproductive Material (Production, Marketing and Control of Forest Reproductive Material Regulations 2007 (Amendment)

1.3. Basic Regulatory framework

- The Strategic Plan of the Forestry Department of the Ministry of Agriculture, Rural Development and Environment of Cyprus is covering the three-year period 2021-2023 and defines a Strategic Objective and six Activities, that relate to specific Actions leading to the implementation of the Objective.
- The Forest Policy Statement was approved by the Council of Ministers in 2013. It was adopted by a decree of the Minister of Agriculture, Rural Development and Environment in accordance with Article 9 of the Cypriot Forest Law. It is governed by 4 basic principles: the principle of sustainability, the principle of multipurpose forestry, the principle of integrated management of the forest ecosystem, and the principle of participatory decision-making. This Statement sets out 13 purposes. For each purpose, specific targets are set and for each target, a description of the current situation is provided, the target itself and the actions by which it will be achieved.
- Regarding the National Forestry Plan, it should be noted that according to the official information available on the website of the Forestry Department the process of preparing the new National Forestry Plan in Cyprus has been interrupted as a result of the severe financial crisis and recession. The Strategic Plan of the Forestry Department mentioned above under 1.3 performs the functions of the National Forestry Plan.

- Specific Sectoral Policies have been adopted to address individual issues in Cyprus, including the following:
    - Control of Invasive Trees in Natural Ecosystems in Cyprus: Strategy and Techniques (Guide)
    - Collection, Production and Disposal of Forest Reproductive Material by the Forestry Department (Guidelines).
    - Policy of the Forestry Department on the production and establishment of forest plants.

2. Governance and institutional framework

2.1. Distribution of competences between the State and Regional authorities.

- **According to the legal framework, what are the relevant competences and responsibilities regarding decisions on forest management and forest management practices at the different State levels (national, regional, municipal) in your country?** Please describe the situation stating the legislation and relevant provisions.

In Cyprus, the decentralisation of government activities at the regional level is achieved through the operation of District Administration Offices.[2] Cyprus is divided into six Administrative Districts as stated at Article 2 of the District Self-Government Organizations Law of 2022 (37(I)/2022) when defining the term district ("επαρχία"). Concerning local government, there are two forms of authorities, the Municipalities and the Communities, which are involved in the process of planning and implementing development programmes and projects. Following a Local Government Reform of the Municipalities Law of 2022 (52(I)/2022), 20 municipalities are established (Article 3 of Municipalities Law of 2022 (52(I)/2022)[3]. The responsibilities of the Municipalities include, among others, the protection and improvement of the environment of the Municipality, the construction, improvement and maintenance of parks and green spaces (Article 43 of Municipalities Law of 2022 (52(I)/2022). Some of the sources of municipal income are taxes, fees, charges, and contributions and government grants (Article 91(3)(d) and (e) of Municipalities Law of 2022 (52(I)/2022).

The legal framework that sets out the competencies and responsibilities regarding decisions on forest management and forest management practices at different state levels is Law 25(I)/2012.

At a national level, the **Director of the Department of Forests of the Ministry of Agriculture, Natural Resources and Environment** or any other person duly authorised by him/her is responsible for the implementation of the Cypriot Forest Law and the Regulations issued thereunder. In addition, the Law expressly states the powers and competences of the Director. More specifically, according to Article 4 of the Cypriot Forest Law, the Director: ensures the conservation, protection, sustainable management and development of the public forests of the Republic; promotes the conservation, protection, sustainable management and development of private forests in the Republic; ensures that the National Forest Policy and the National Forest Programme are adopted and implemented; prepares forest management plans and implement those that have been adopted; proposes the declaration of public forests, natural reserves, national forest parks, protective forests, forest parks, forest monuments, natural micro-reserves and community forests where it deems necessary; issues permits in accordance with this Law and the Regulations issued under it; ensures the correct application of the Community acquits in relation to forests and forestry; ensures that the consequences of offenses of the law are removed; plans and implements all necessary measures for the prevention and suppression of

[2] District Administration Offices website available at: https://www.moi.gov.cy/moi/da/dadmin.nsf/dmlhistory_en/dmlhistory_en?OpenDocument#

[3] Cypriot Ministry of Interior's website, available at: https://www.gov.cy/moi/20-neoi-dimoi/

forest fires; proceeds to the reconciliation of offenses under the law; conducts surveys, collects information and data, prepares programmes, reports and plans, and establishes and maintains databases and geographical information systems; maintains records of forest product traders, forestry enterprises and private forest owners; establishes any sampling surface or instrument on any land; and exercise the right of entry on private land for the purposes of the application of the law.

Regarding Natura 2000 network, the Director has the authority to manage the public forests located within the areas included in the Natura 2000 network, as set at the Article 20(1) of the Cypriot Forest Law.

With regard to forest management plans, these are implemented by the **Minister of Agriculture, Natural Resources and Environment**, as stipulated in Article 18(3) of the Cypriot Forest Law. The Minister may, after evaluating the Director's proposal, amend it as he/she considers appropriate and, in the case of Forest Management Plans, adopt them and in all other cases, submit a proposal to the Council of Ministers.

At a local level, the **Council of the Community** within the boundaries of which the community forest is situated shall conclude an agreement with the Director. Article 27 of the Cypriot Forest Law defines the content of this agreement, which includes the duration of the agreement; the rights and obligations of the Director and the community councils, including provisions for the distribution of any financial or other benefits that may arise from the management of the community forest and the consequences in the event of a breach of the agreement by any party; and the management plan for the area concerned.

A **Forest Advisory Body** shall be established under Article 5 of the Cypriot Forest Law, which shall advise the Council of Ministers and/or the Minister and/or the Director and/or the Forestry Extension Committee on forestry matters. This includes matters relating to: the declaration of public forests; the declaration of natural reserves, national forest parks, protective forests and forest parks; the declaration of forest monuments and natural micro-reserves; the declaration of community forests; the designation of part of a public forest as a public road; the adoption and amendment of the National Forest Policy and the National Forest Plan; and any other matters which may be referred to the said Board by the Minister or the Director or brought by the Board on its own motion.

Also, under Article 11 of the Cypriot Forest Law, and for the purpose of formulating proposals for the declaration of real property belonging to the Republic as a public forest, a **Forest Expansion Committee** shall be established.

2.2. Key representation organisations of the forest sector

Cypriot Forest Law sets a provision on the recognition of private forest owners' organisation. In particular, Article 30 of the Cypriot Forest Law provides that any group or association of private forest owners may be recognised as a private forest owners' organisation upon application to the Director of the Department of Forests. The Director may recognise any applicant as a private

forest owners' organisation if he confirms that: the applicant aims at the sustainable management of forests owned by the members of the organization; and the sustainable management is supported by a relevant management plan.

However, there is no legislative provision concerning organisations related to forest municipalities, forest industry, forest clusters, forest contractors, forest professionals, forest agents or rangers, forest sciences, forest certification, public enterprises, forest cooperatives, or any other forest organisation.

The Cyprus Forest Association (Φιλοδασικός Σύνδεσμος Κύπρου) is founded in Cyprus. It is a professional association representing forestry professionals in Cyprus that promotes knowledge sharing, forestry education, and best practices. The mission of Cyprus Forest Association as a link between the public, organised associations and the state, is to ensure that Cyprus' forests are adequately protected and spread further, improving the quality of life of Cyprus' citizens.

In practice, and regarding private forests, no organisation representing private forest owners collectively is found to exist in Cyprus, unlike in other European countries. This may be due to the small scale of private forests and their limited role in the overall forest sector in the country.

Private forest owners may be members of agricultural cooperatives or general associations, such as Pancyprian Union of Agriculture Scientists (Παγκύπρια Ένωση Γεωπόνων, ΠΑΓ) and Pancyprian Agricultural Payments Organisation (Παγκύπριος Οργανισμός Αγροτικών Πληρωμών, ΚΟΑΠ). This associations are platforms for agricultural professionals who could participate in the debate on forest ecosystem management and protection issues, although it should be noted that they are not exclusively dedicated to forestry purposes.

With regards to certification, there are two main certification systems within the EU: the Forest Stewardship Council (FSC) and the Programme for the Endorsement of Forest Certification (PEFC). For neither of these two systems any national contact points or offices are registered and can be identified in Cyprus.

3. Forest land ownership structure

- **According to State statistics, what is the ownership structure of the forest in your country (at State level)?** Please include relative and absolute data of forest ownership types, including average size of public and private forests and the number of area of forests in each size category)

3.1. Data on national forests ownership structure

In 2015, 53,735 hectares of Cypriot forests were private forests.[4] No more recent data were found.

There is no official data on the number of forest owners and forest holdings, nor a register covering all forest holdings.[5]

3.2. Definitions of forest ownership in your country

Please provide the definitions identified in the legislation applicable in your country, following the guidelines shared with you.

- **Forest owner**

According to Article 2 of the Cypriot Forest Law, "*Private Forest Owner" means any natural or legal person, including local government authorities and religious authorities, who is entitled to be registered as the owner of real property which may be classified as a forest or woodland".*

- **Forest holder**

According to Article 2 of the Cypriot Forest Law ""*Forestry enterprise" means any entity or association of persons, with or without legal personality, or company, operating a forest or forest land or a product derived from or produced by forest plants".*

- **Forest manager**

No definition of forest manager has been found in Cypriot legislation.

- **Forest contractor**

No definition of forest contractor has been found in Cypriot legislation.

- **Forest**

In Cypriot legislation, Article 2 of the Cypriot Forest Law, on Forests defines forests («δάσος») as "*an area greater than 0.3 hectares, with forest trees that are greater than 5 meters in height and have a ground cover of greater than 10%or with trees that at a matured stage have the capacity to meet these criteria and includes: (a) forest roads, fire protection zones and other small open spaces located within it; (b) reforested areas as well as burnt forest areas or areas which have temporarily*

[4] Food and Agriculture Organization of the United Nations, Global Forest Resources Assessment (FRA) 2020 Cyprus

[5] Cyprus did not respond to criteria 6.1 (tables 41 and 42) of State of European Forests SOEF-2020 (Forest Europe, 2021)

low vegetation due to human intervention or natural causes and are expected to recover but shall not include urban parks and gardens".

Furthermore, the notion of "Forest area" («δασώδης έκταση») refers according to Law to "*a surface of more than 0,3 hectares which cannot be classified as forest, but which has a ground cover of forest shrubs and trees of more than 10%".*

3.3. Forest ownership types in your country

- Please provide a **description of the types of forest ownership** (e.g. public forest, private forest) identified in the legislation applicable in your country. **Are there specific laws** for certain types of collective, communal, liminal or neighbourhood forests?

Article 2 of the Cypriot Forest Law, refers to three types of forests based on the type of ownership:

i. **Public forest**, defined as any forest or forest land or any other land that has been declared as such by the Council of Ministers, if it is deemed appropriate for the better protection and management of forests and for the protection of forest flora species or forest ecosystems of exceptional importance or rarity. Public forests are property of the State.

ii. **Communal forest**, any area designated as such by the Council of Ministers for the purpose of managing or developing the forest area for the benefit of the residents of the area, which may include one or more communities.

iii. **Private forest**, defined as any private land which may be designated as forest or woodland. As mentioned above under 3.2, According to the Article 2 of the Cypriot Forest Law, "Forest" means an area greater than 0.3 hectares, with forest trees that are more than 5 metres high and have a ground cover of more than 10% or with trees that at maturity have the potential to meet these criteria and includes; (a) forest roads, firebreaks and other small open spaces located therein, (b) reforested areas as well as burnt forest areas or areas which have temporarily low vegetation due to human intervention or natural causes and are expected to recover, but does not include urban parks and gardens; "wooded area" means an area of more than 0,3 hectares which cannot, however, be classified as forest, with a ground cover of forest shrubs and trees of more than 10%.

   The Cypriot law does not include any provision on the procedure for declaring a public forest as a private forest[6].

[6] Information confirmed through interview (Interview with Authority, 24.01.2025).

There are no specific laws for certain types of forests under Cypriot legislation.

- Are there well-established programs for forest land consolidation? Are there public bodies promoting or responsible for these programs?

According to the website of the Department of Forests of the Ministry of Agriculture, Natural Resources and Environment, the process of preparing the new National Forestry Programme has been interrupted as a result of the severe financial crisis and recession as well as the need to prepare a short-term strategic plan for the entire public sector as a general government policy for a more targeted allocation of resources and immediate measures to restart the economy. However, the Strategic Plan of the Forestry Department mentioned under section 1.3 performs the functions of the National Forestry Plan. The last Strategic Plan of the Forestry Department is covering the three-year period 2021-2023 and defines a Strategic Objective and six Activities, that relate to specific Actions leading to the implementation of the Objective.

3.4. Proof of ownership: Land registry and Cadastre

- How is ownership proved?

In Cyprus each District Land Registry Office maintains a Land Register for its respective District, Municipality, and Community. This register records all real property registrations and transfers, as required in Article 51(a) of Real Property (Possession, Registration and Valuation) Law Chapter 224. Pursuant to Article 51A, the Director of the Department of Cadastre and Land Surveying shall provide any person concerned, including the owner, with any information in connection with any entry in any register or other book maintained in each District Cadastral Office. Every certificate of registration shall be in such form and content as the Director of the Department of Cadastre and Land Surveying of Cyprus shall decide. As the Cypriot Forest Law expressly states (Article 2) that " real property" has the meaning given to this term in Article 2 of the Real Property Law, we should mutatis mutandis consider that ownership of forest land is proved by the certificate provided by the Director of the Department of Cadastre and Land Surveying.

Moreover, the Cypriot Forest Law sets in Article 4(I) that the Director of the Department of Forests of the Ministry of Agriculture, Natural Resources and Environment keeps records of owners of private forest. Furthermore, according to Article 63 of this Law, the Director shall maintain a Register of Owners of Private Forests and may require a private forest owner to register in that Register. Upon consultation with national authorities, it was stated that there has been no interest from any owner for registration in this Register[7]. In addition, according to Article 64(2), every private forest owner who has registered in the Private Forest Owners' Register shall also keep a register containing information on the area of forest land, production and sales of forest products for a period of at least 2 years from the end of each commercial transaction.

This register is distinct and does not coincide with the agricultural register nor is it necessarily harmonized with the ownership register, although in practice a forest landowner is obliged to

[7] Interview with Authority, 24.01.2025.

register in the general property/ownership register as well and there will therefore de facto be a coincidence of the private forest land registrations on both registers.

The provision of Article 3 of the RAA no 132/2012 (The Forest Regulations of 2012-Recognition of Private Forest Owners' Organisations) sets that in the case of an application for a permit to harvest timber and forest products, if the application concerns non-public land, a certificate from the relevant local authority within the jurisdiction where the land is located must be submitted with the application, which certifies that the land is owned by the applicant. This certificate could also be considered as proof of ownership.

It should also be noted that under the national legislation, in Cyprus the mechanism of Forest Inventories is identified, which aim to collect all the necessary data from the forests in order to rationally plan the management of the forests as well as to monitor the dynamic evolution of the stands. This mechanism could serve de facto as a proof of ownership of forest land.

- Is there a legal obligation to register **ownership/property**?

As mentioned above under 3.4, the Director of the Department of Forests of the Ministry of Agriculture, Natural Resources and Environment shall maintain a Register of Owners of Private Forests and may require a private forest owner to register in that Register under Article 63 of Cypriot Law on the Forests. The letter of the law does not imply a mandatory obligation to register, but only if this is required by the Director. However, Article 40 of the Cypriot Forest Law states that in case of a private forest owner who does not comply with any relevant recommendation of the Director, a fine of up to EUR 1000 is foreseen in case of conviction.

- Is there a registration fee?

The According to the website of the Department of Cadastre and Land Surveying, there are fees and rights based on the relevant Laws and Regulations concerning real property (a summary table of the fees and rights can be found here). For example, we can mention that in the case of registration of a title, in the case of donation between spouses and between up to the third degree of relatives, the value of the property being transferred is subject to a rate of one per ten thousand, or, in the case of a sale, the rate is applied to the sale price or the market value of the property being transferred, as applicable: for each euro up to the amount of EUR 85 000,00, the rate is three percent; for each euro beyond EUR 85 000,00 but not exceeding EUR 170 000,00, the rate is five percent; and for each euro beyond EUR 170 000,00, the rate is eight percent.

- **Is there an official register of forest owners and of forest holdings? Is it shared with agricultural registers? Is it harmonized with the general property/ownership register?**

The Cypriot Forest Law provides in Article 63 the keeping of a Register of Owners of Private Forests and the discretion, according to the letter of the Law, of the Director of the Department of Forests to require any owner of a private forest to register in the above-mentioned Register.

This Register is distinct and does not coincide with the Agricultural Register nor is it harmonized with the Ownership Register. However, forest landowners are required to register in the general

Ownership Register, which means that, in practice, private forest land registrations shall appear in both registers (Forest Land Register and the Ownership Register).

Upon consultation with national authorities, it was stated that there has been no interest from any owner for registration in this Register[8].

- Is the **Cadastre/register** well updated and reflecting real forest owners/holders?

Upon consultation with public authorities, it has been noted that in Cyprus there is a forest cadastre, which defines geographically, clearly on the ground, the boundaries of the public forest land. The first and official zoning of the public forest land was carried out in January 1941. Today, in the context of zoning the public land, the Forestry Department, in cooperation with the Department of Cadastre and Land Surveying, carry out jointly spatial surveying work to check and update the boundaries in accordance with the Land Plans in force. As a result of the above work, the distinct boundaries of the public forest land are depicted on the ground using the Forest Landmarks and also on the Land Plans in force. In addition, a digital file of geospatial data with these boundaries is maintained for use in computer software that processes geographic information. The above procedure ensures that the boundaries of the public forest land remain unchanged.

With regard to private forests, in accordance with Article 63 of Cypriot Forest Law, the Director of the Department of Forests shall maintain a Register of Owners of Private Forests. However, there has been no interest from any owner for registration in the relevant Register. Therefore, there is no specific official register (cadastre) of forest owners, nor is there any identification with the general cadastre, as private forests have been physically established on abandoned agricultural land and therefore in the general cadastre, private land occupied by forests is reported as agricultural land[9].

[8] Interview with Authority, 24.01.2025.

[9] The source of this reply is an interview conducted with a stakeholder (Interview with Authority, 24.01.2025).

4. Rights and obligations: forest owner/holder and forest contractor

4.1. Overview

- **According to the legal and regulatory framework what are the rights and obligations of forest owners/holders and forest managers in your country?**

With regard to **forest owners,** the following **rights** are identified in the Cypriot Forest Law:

- Any group or union of private forest owners may be recognized as a private forest owners' organisation upon application to the Director according to Article 30;
- A private forest owner or a recognized private forest owners' organisation may, by agreement with the Director, delegate the protection, management and development of such forests to the Director according to Article 31;
- The Director shall provide the necessary technical support that may be requested by a private forest owner or a recognized organisation of private forest owners according to Article 31.

With regard to **forest owners,** the following **obligations** are identified in the Cypriot Forest Law:

- Private forest owners or their organisations must aim for sustainable forest management supported by a relevant management plan (Article 30). Sustainable management aligns with the purpose of the Cyprus Forest Law, as described in Article 3.
- Every owner of a private forest who is registered in the Register provided in law shall keep a record, in written or electronic form, of the area of forest land, production and sales of forest products for a period of at least 2 years from the end of each commercial transaction according to Article 64(2);
- Every owner of a private forest shall submit to the Director, on request, information or data contained in the registers it is required to keep according to Article 64(3).

With regards to **forest holders**, the following **obligations** are identified in the Cypriot Forest Law:

- Every forest enterprise that is registered in the Register provided for in Article 62 shall keep a record, in written or electronic form, of all sales and purchases of forest products for a period of at least two years from the end of each commercial transaction, according to Article 64(1).
- Every forestry enterprise or forest product trader shall submit to the Director, upon request, information or data contained in the records they are required to keep according to Article 64(3).

With regard to **forest managers,** the following **right** is identified in the Cypriot Forest Law:

The Director of the Department of Forests of the Ministry of Agriculture, Natural Resources and Environment, who (as mentioned above, under 2.1) is considered to be the forest manager, shall exercise the right of entry onto private land for the purposes of the law according to Article 4(n) of the Cypriot Forest Law.

With regard to **forest managers,** the following **obligations** are identified in the Cypriot Forest Law:

The Director of the Department of Forests, who is considered as the forest manager, is obliged, according to Article 4 of the Cypriot Forest Law, to undertake the following actions:

- ensure the conservation, protection, sustainable management and development of the public forests;
- promote the conservation, protection, sustainable management and development of private forests;
- ensure that the National Forest Policy and the National Forest Programme are adopted and implemented;
- prepare forest management plans and implement those that have been adopted;
- propose the declaration of public forests, natural reserves, national forest parks, protective forests, forest parks, forest reserves, forest monuments, natural micro-reserves and community forests where it deems necessary;
- issue permits in accordance with the law and the regulations made thereunder;
- ensure the correct application of the Community acquits in relation to forests and forestry;
- ensure that the consequences of offenses are removed according to the law;
- plan and implement all necessary measures for the prevention and suppression of forest fires;
- proceed to the reconciliation of offenses according to the law;
- conduct surveys, collect data, information and data, prepare programme, reports and plans, and establish and maintain databases and geographical information systems;
- maintain records of forest product traders, forestry enterprises and private forest owners;
- establish any sampling surface or instrument on any area of land;
- exercises the right to enter private land for the purposes of the application of this Law.

4.2. Legal rights of the forest owner/holder

- **Right to financial support/tax exemptions/subsidies? What are the requirements?**

No such right is mentioned in Cypriot legislation.

- **Is there a right to decide about the forest management practices in their forest land?**

According to the Cypriot Forest Law (Article 30 and 31), any group or association of private forest owners may be recognized as a private forest owners' organization upon confirming that: they aim at the sustainable management of forests owned by the members of the association and the sustainable management is supported by a relevant management plan. Furthermore, and as mentioned under 4.1, the Director shall provide the necessary technical support that may be requested by a private forest owner or a recognized organisation of private forest owners according to Article 31. Since the Director is responsible under the wording of Article 4(b) for the conservation, protection, sustainable management and development of private forests in the Republic of Cyprus, it follows as a logical consequence that the Director has an obligation to provide the necessary technical support that may be requested by a private forest owner. And this is because Cypriot legislation equips the Director and the Department of Forests in general with the necessary expertise for the management of forests. This expertise must be put at the service of both public and private forests of Cyprus.

Hence, it can be concluded that there is a right of management for private owners' associations and only if they decide to do so they can assign this right to the Director of the Department of Forests of the Ministry of Agriculture, Natural Resources and Environment or any other person duly authorized by him/her.

- **Is there a right to harvest?**

No such right is mentioned in Cypriot legislation. The right to harvest timber and forest products is subject to an authorization scheme as set under Article 3 of the RAA no 133/2012 (see below under section 4.3).

4.3. Limitations to the rights of forest owner/holder

- **Is there a limitation to change the land use of the land (from forestry to agriculture and/or urbanization)?**

With regard to public forest land, according to Cypriot Forest Law, the change of use from forest land is allowed only in exceptional cases. Under Article 17 the opinion of the Forestry Advisory Board and considering the views of the Director of the Department of Planning and Zoning as essential and only for purposes of public interest a declaration of part of a public forest on a public road is permitted. Moreover, according to Article 37, agricultural activities are prohibited in public forests. However, according to Article 6 of RAA No. 134/2012, the Forestry Regulations of 2012, in exceptional cases and only for purposes of public interest, the Council of Ministers may decide to lease state forest land for agricultural purposes. As informed by national authorities these cases are minimal.

Unlike public forests, private forests are not systematically managed. However, there are some restrictions on land use change. According to Cypriot Forest Law, Article 23, the felling and transportation of forest trees growing in private forests is only allowed with the permission of the Director of the Department of Forests. In addition, according to Second Annex, Articles 1(b) and (d) of RAA 68/2023 amending the Cypriot Laws on the Environmental Impact Assessment of Certain Projects of 2018 and 2021, the projects for which information is submitted for a reasoned determination of whether an environmental assessment study is required include the following, than can concern private forests:

i. projects for the use of uncultivated land or semi-natural areas for intensive agricultural cultivation, which occupy an area of more than 5000 m^2 and which are carried out for commercial purposes,

ii. Initial afforestation and deforestation for the purpose of conversion to another type of land use, if it occupies an area of more than 3000 m^2 and if it is carried out for commercial purposes[10].

- **Is there a legal limitation to the right to harvest? Is there a ban on clear-cutting?**

The right to harvest timber and forest products is subject to an authorization scheme as set under Article 3 of the RAA no 133/2012. According to this provision an application for a permit shall contain a detailed description of the type of forest product concerned, its location, the quantity requested and the manner and time of harvesting. Moreover, it is provided that, where the application relates to land outside a public forest, a certificate from the relevant local authority within the jurisdiction of which the land is located shall be submitted together with the application, confirming that the land is owned by the applicant or that the applicant has obtained the consent of the owner for the grubbing up, felling, cutting, harvesting or extraction of the forest product. The permit issued shall specify the time within which the grubbing, felling, cutting, harvesting or extraction of the forest product shall take place.

Also, the following statement can be found on the Department of Forests's website: *To ensure through the adequate management of forests the continued production of all non-wood products when conditions require it and especially for the purpose of protecting biodiversity and/or the ecosystem, a complete ban on the harvest of products produced in Cyprus' forests or to limit harvesting to designated areas may be adopted. Products produced in Cyprus' forests, other than timber, are water, preys, mushrooms, herbs, Christmas trees and honey.*

- **Are there limitations to carry out non-forest activities in forest land (like mining, energy plants, etc.)?**

Cypriot Forest Law at the Article 24 stipulates that construction permit for Mine or Quarry development, under the provisions of the Town and Country Law, within a public forest, shall be

[10] The source of this reply is the legislation mentioned, further analysed/checked through an interview conducted with a stakeholder (Interview with Authority, 24.01.2025).

issued only after the views of the Director have been taken into account. The views of the Director are an essential factor in the decision-making process.

- **Are there specific limitations to carry out agricultural activities, like extensive grazing or temporary cultivation, on forest land?**

There is no such provision under the Cypriot legislation.

- **Is hunting right linked to ownership, right? Is it considered a forest activity, or does it have specific regulations?**

Hunting is not linked to ownership in the Cypriot legal framework, nor are there provisions on access to private forests for hunting purposes.[11] Hunting activities may be carried out only by persons holding a special and personal permit and only for a specific period and in specific zones. The Law on the Protection and Management of Wild Birds and Game of 2003 (152(I)/2003) states in Article 2(1)(c) that to prevent serious damage to forests, it is possible to impose restrictions on the hunting regulations.

- **Are there citizens' rights to collect wild products in forest land? Are they linked to the ownership right or not?**

There is no such provision under Cypriot law.

- **Are there rights to access (walking) on forest land? Are there specific regulations for public use of forest land, hiking, riding, biking, etc.?**

Under the Cypriot Forest Law and its associated regulations, there is no explicit provision granting a general right of access, such as walking on forest land, particularly in private forests. However, such a right can be considered inherent to the right of ownership of private forest land, mutatis mutandis. The owners of private forests, by virtue of their ownership, possess the right to access their land, including walking and other non-destructive activities. This right is exercised within the general limitations and restrictions imposed by the Law, which prohibits activities that could harm the forest, as for instance mentioned under the Articles 32-40. Such activities include lighting fires, unauthorized tree cutting, waste dumping, or causing environmental degradation, and these restrictions apply regardless of ownership. Additionally, Article 50 grants forest officers the power to enforce these rules and prevent illegal or harmful activities in forest areas.

In contrast, the situation in state forests is governed more explicitly. Public access for purposes such as walking, hiking, riding, or biking is generally permitted but subject to regulations that ensure sustainable use and protection of the forest environment. Specific provisions, such as those outlined in the RAA No. 505/2014, The Forest Regulations of 2014, Amendment (Permits, Use of Forest Roads, and Export of Forest Products), further govern organized events of biking races. According to Article 2(b), such events require prior approval from the Forest Department under strict conditions, including adherence to fire safety measures and prepayment of costs for

[11] Information confirmed by public authorities (Interview with Authority, 24.01.2025).

any additional fire protection measures required. Furthermore, the routes for such events must be designated and approved by the Director of the Forest Department, taking into account the organizer's input and the risks to forest protection. These events are further subject to time restrictions, as they are generally prohibited during the high-risk fire season. However, exceptional permits may be issued for the months of September, October, and May, provided the organizer demonstrates that scheduling the event outside these months was not possible and all fire safety requirements are met.

4.4. Forest owner/holder obligations and requirements.

- **Which requirements or obligations regarding forest management are imposed on owners?**

As mentioned above under 2.2, in order for a private forest owners' organisation to be officially recognized, the organisation shall demonstrate that it aims to sustainably manage the forests owned by its members and that sustainable management is supported by a relevant management plan. Verification of the aim is carried out by the Director of the Department of Forests as specified in Article 30 of the Cypriot Forest Law. This comes in full harmony with the ratio legis of the Cyprus Forest Law as set out in Article 3, according to which the purpose of the Law is, inter alia, the sustainable management and development of forests.

There is also a provision in Article 31 that a private forest owner or a recognized organization of private forest owners may, by agreement, delegate to the Director the protection, management and development of such forests. Such agreement shall include, inter alia, a management plan for the forest area.

- **Is there a tax** imposed on forest ownership?

No such specific tax provision can be found in Cyprus legislation.

- **What type of permits the forest owner needs** to manage their land?

The types of permits provided for in the law under Articles 23, 24 and 28 and also under the Articles 3 and 4 of the RAA No. 133/2012 (Permit for grubbing, felling and cutting of the top of the trunk of any tree or bush, planning permission for the development of a mine or quarry, permission to cut, collect or transport any forest product) are referred to public and community forests. There is no legislative provision for permits with regard to forest owners.

- **How is the control of forest harvest determined? Is there an obligation to mark every tree to be cut or retained?**

Upon review of the Cypriot legislation, no such provision has been identified, and it must therefore be concluded that such an obligation does not exist.

- **Are there technical, administrative or economic specifications on the forest products market? Are forest harvest contracts legally defined for public or private forests, or for some specific types?**

Article 3(1) of the RAA No. 133/2012, The Forestry Regulations of 2012 (Permits, Use of Forest Roads, and Export of Forest Products) mandates that harvesting (cutting, uprooting, collection, or export) of any forest products, including wood, requires an official permit issued by the Director of the Department of Forests. The permit request shall include details such as the type, quantity, and location of the forest product to be harvested. In the case of wood transport, Article 4 requires a separate transport permit that must specify the route, time, and methods for moving the wood or other products. The above mentioned provisions refer to public forests.

- **Is there an obligation to prevent forest fires or other risks?**

There is a provision in the Cypriot Law regarding the suppression of wildfires in private forests. Article 47 sets out the provisions relating to the suppression of fires on private property. According to this article, the Director shall, if necessary for the protection of a public forest, suppress a fire on private property that endangers a public forest. It shall be held that private property also includes the concept of private forest.

The planning and implementation of any measures deemed to be necessary to prevent forest fires and which consider possible impact on forest functions and on biodiversity and forest landscape is the responsibility of the Director according to Article 46 of the Cypriot Forest Law.

With regard to forest fires, which are one of the main threats to forests in Cyprus, according to Article 46 of the Forest Law, the person responsible for the prevention and suppression of forest fires is the Director of the Department of Forests. The Director is in particular responsible for the planning and implementation of any measures deemed necessary for the prevention of forest fires and which take into account the possible impact on forest functions and in particular on biodiversity and the forest landscape and also for the suppression of any forest fire in the Republic of Cyprus.

Upon consultation of the public authorities, it is concluded that with regards to public forests, following a fire, a post-fire management plan for the burnt area is prepared, which includes all necessary restoration activities, so that over time all functions of the forest are restored. However, this does not apply to private forests, nor is there a legal obligation to reforest after a forest fire[12].

No information was found on other risks.

- **Is fencing or the use of forest roads regulated?**

Article 2 of the Cypriot Forest Law defines a '*forest road* as *any road, ditch, path, bridge and small bridge over which a forest road passes and the parapets and parapets of any such bridge, and any*

[12] Interview with Authority, 24.01.2025.

ditch, embankment, ditch, ditch, stone road, retaining wall or road marker located or constructed within a public forest and not declared to be a public road'.

Article 65(1) and (2)(o) of the Cypriot Forest Law state that the Council of Ministers may make Regulations for the determination of any matter which requires or is capable of being determined. In particular, such Regulations may provide for the prohibition or regulation of the use of forest roads.

In addition, Article 37(g) and (i) enumerating the offenses committed in public forests mentions forest roads and specifically provides penalties for any person who trespasses, destroys or in any way damages or obstructs traffic on a forest road or drives a motor vehicle of any type off a forest road thereby causing damage to forest vegetation and/or soil.

- **Is there an obligation for forest owners and/or forest managers to be associated?**

As mentioned above under 2.2, the law under Article 30 states that any group or association of private forest owners may be recognized as a private forest owners' organization upon application to the Director. Therefore, there is the possibility, but not an obligation, for forest owners to be associated.

4.5. Forest manager/contractor obligations

- **Which requirements or obligations on forest management are legally imposed on forest managers/contractors**?

The Cypriot Forest Law explicitly defines in Article 4 the obligations of the Director of the Forestry Department within the scope of the management competences reserved to him/her. In particular, the Director is obliged to take the following actions:

a. ensure the conservation, protection, sustainable management and development of the public forests of the Republic;

b. promote the conservation, protection, sustainable management and development of private forests in the Republic;

c. ensure that the National Forest Policy and the National Forest Programme are adopted and implemented;

d. prepare forest management plans and implement those that have been adopted;

e. propose the declaration of public forests, natural reserves, national forest parks, protective forests, forest parks, forest monuments, natural micro-reserves and community forests where it deems necessary;

f. issue permits in accordance with this Law and the Regulations issued under it;

g. ensure the correct application of the Community acquits in relation to forests and forestry;

h. ensure that the consequences of offenses of the law are removed;

i. plans and implements all necessary measures for the prevention and suppression of forest fires;

j. proceed to the reconciliation of offenses under the law;

k. conduct surveys, collects information and data, prepares programmes, reports and plans, and establishes and maintains databases and geographical information systems;

l. maintain records of forest product traders, forestry enterprises and private forest owners; and

m. establish any sampling surface or instrument on any land.

Regarding the forest management plans, they shall be implemented by the Minister of Agriculture, Natural Resources and Environment or any other person duly authorized by him/her in accordance with the Article 18(3).

In regard to Natura 2000 network, Article 20(1) states that the Director of the Forestry Department has the authority to manage the state forests located within the areas included in the Natura 2000 network.

Additionally, during the consultation process for the adoption or revision of the National Forest Policy and the National Forest Plan, as regulated in Article 21(6), it is provided that the Minister of Agriculture, Natural Resources and Environment may, after evaluating the Director of the Forestry Department's proposal, amend it as he/she considers appropriate and, in the case of Forest Management Plans, adopt them and in all other cases, submit a proposal to the Council of Ministers.

- **What legal rights does the forest manager/contractor have in your country**?

Pursuant to Article 61 of the Cypriot Forest Law, the Director may acquire the right to access private land, in favor of an adjoining forest land, either by agreement with the owner, which shall determine the compensation to be paid, or compulsorily in accordance with the provisions of the Real Property Law.

- Is **there a requirement of a forest management plan**? Are there detailed prescriptions on that?

The Cypriot Forest Law requires the preparation and adoption of forest management plansaccording to Article 18 of the Cypriot Forest Law. As mentioned above, these plans shall be implemented by the Minister by means of a notification published in the Official Journal of the Republic.
Cypriot legislation sets out the requirements of forest management plans in detail.
Regarding the content of the above-mentioned Plans, Article 19 of the Law states that the management plans shall contain the following elements:

a. description and evaluation of all the elements of the area;

b. the aims and objectives of the management of the area;

c. proposals on the measures required to achieve the management objectives and aims, covering all forest functions and uses, including the conservation, restoration and protection of nature, biodiversity and rare or important species of flora and fauna, leisure, tourism, support for local communities, landscape improvement, soil and water protection, protection of forest from wildfires, harmful organisms and other degradation factors, afforestation, reforestation, forestry operations, timber, prey and other products; and

d. consideration of development plans prepared under the Town and Country Planning Law, as amended or replaced, or other plans prepared under any other Law.

- Is there an **obligation to register the responsibility** of forest manager/contractor?

    i. Is registration based on product income?

    ii. Is there a registration fee?

There are no such provisions in the Cypriot Forest Law.

- Is there a **tax imposed on the forest manager**? Is it based on income or hectares?

There is no such provision in the Cypriot Forest Law.

5. Forest Management plans

- Are forest management plans required in the legislation of your country?
  - ☒ Yes
  - ☐ No

  Specify where and the conditions as well as the amount of forest land with plans

As mentioned above under 4.5, the Cypriot Forest Law requires the preparation and adoption of forest management plans. A forest management plan may cover one or more public forests or areas.

Article 18 of the Cypriot Forest Law states that the Director of the Department of Forests shall ensure the preparation, adoption and implementation of forest management plans for each natural reserve, national forest park, protected forest and forest park and for all other public forests.

A special procedure for the elaboration or revision is provided for a forest management plan that meets one of the following conditions:

- relates to a natural reserve, national forest park, protective forest or forest park; or
- is expected to have a significant impact on the living conditions of affected persons; or
- significantly affects biodiversity and/or the natural environment in general; or
- covers an area of more than one hundred (100) hectares.

Such forest management plan shall be elaborated or revised in accordance with the procedure described under Article 18(5) and as elaborated below:

The Director shall send a copy of the draft forest management plan to all interested government departments or agencies and seek their views. He/she also shall hold at least one public presentation of the draft forest management plan, to which the affected local government authorities and non-governmental organizations are invited to participate.

Each forest management plan shall be based on data collected through mapping, inventory and other available data concerning forest resources and shall be consistent with the content of the National Forest Policy and the National Forest Plan: Provided that, at the stage of preparation of each forest management plan, the views of the competent departments, agencies, local government authorities and farmers' organizations shall be taken into account.

Data on the amount of forest land with plans can be found on the Cypriot Report of 2014 for the Global Forest Resources Assessment for the Food and Agriculture Organization of the United Nations. According to this report, the forest area under management plans cover 107,054 hectares, of which 41,399 hectares for production and 3.387 hectares for conservation. [13]

[13] Global Forest Resources Assessment, Food and Agriculture Organization of the United Nations, Country Report Cyprus, Rome, 2014, Page 71

Up to date, the following Forest Management Plans have been elaborated in Cyprus according to the website of the Department of Forests:

- Management Plan of the forests of Limassol, Ayios Mamas and Akapnous
- Management Plan of the Mahaira National Forest Park
- Management Plan of the Paphos Forest
- Management Plan of the Rizoelia National Forest Park and the Alona and Melissia Forests
- Management Plan of the Stavrovouniou Forest.

- Are there other type of plans required, such as:
  - ☐ Technical Plan
  - ☐ Financial Plan
  - ☐ Exploitation Plan
  - ☐ Fire prevention Plan
  - ☐ Hunting Plan
- Please indicate the **minimum size of forest requiring a forest management plan**.

In order for a forest management plan to be elaborated or revised in accordance with the procedures and formalities prescribed by Law, it must cover an area exceeding 100 hectares as set at the Article 18(4)(d). These formalities are the following: the Director shall send a copy of the draft forest management plan to all concerned government departments or agencies and solicit their views, which shall be submitted no later than one month, and organize at least one public presentation of the forest management plan, in which affected local authorities and non-governmental organizations are invited to participate.

- On **which legal basis are they required? Are they legally binding or only guidelines**?

There is no general rule requiring a minimum forest size in order to adopt a management plan. However, and as mentioned above a minimum size of 100 hectares is required so that certain legal formalities can be met. According to Article 18(4)(d). These formalities are that the Director shall send a copy of the draft forest management plan to all concerned government departments or agencies and request their views, which must be submitted within one month at the latest; and organise at least one public presentation of the draft forest management plan, to which the affected local government authorities and non-governmental organisations are invited to participate. It shall be noted that this obligation relates to the specific approval procedure and not to the approval/adoption of a management plan per se.

- **Who has the responsibility for the implementation of forest management plans**? Please, include national, regional, and local levels as appropriate. Please distinguish between state and private ownership. Please distinguish between different protection status.

According to Article 18 of the Cypriot Forest Law, the forest management plans of the **public forests** are officially entering into force by the Minister of Agriculture, Natural Resources and

Environment by means of a notification published in the Official Journal of the Republic of Cyprus. However, it is the Director that shall ensure the preparation, adoption and implementation of forest management plans.

As for the **community forests**, the council of the community within the boundaries of which the community forest is situated shall conclude an agreement with the Director of the Department of Forests for the management of the community forest. This agreement shall include the management plan for the community forest. The Director shall carry out audits to ensure the implementation of the above-mentioned agreement and therefore the implementation of the community forest according to Article 27 of the Law.

Regarding the **private forests**, in the context of the delegation of the management of private forests to the Director of the Department of Forests, the owner of a private forest or a recognized organization of private forest owners shall establish an agreement with the Director regarding the protection, management and development of such forests by the Director. The management plan for a private forest shall be part of the referred agreement in accordance to Article 31(2)(a).

- Are forest **management plans being enforced**?

No information on the enforcement of the forest management plans are provided.

- Is there an obligation to maintain a **Forest Book** (linked or related to the Farm Book of the Common Agricultural Policy (CAP)?

Upon research, no such obligation has been identified.

- **How often do forest management plans need to be updated**? Who is responsible for the update?

There is no provision in law for a specific time frame for the review of management plans.

According to Article 18(6) https://www.cylaw.org/nomoi/enop/ind/2012_1_25/section-sce39a87a8-00a7-7226-eb9e-c2117d624d0c.htmlof the Cypriot Forest Law, forest management plans shall be revised when deemed necessary. The Director shall ensure the preparation, adoption and implementation of forest management plans.

- Are specific mechanisms put in place to guarantee that national legislation is in line with European guidelines and **criteria on forest management plans** (i.e. Natura 2000 Forest Management Plans?

Cyprus is preparing reports in the context of the State of Europe's Forests assessment, which is coordinated by the Forest Europe initiative (Ministerial Conference on the Protection of Forests in Europe) and the United Nations Economic Commission for Europe.

These reports are usually prepared every 4- 5 years in view of the Ministerial Conferences on the Protection of Forests in Europe, where they are presented. They are divided into two forms: the

Quantitative Report, and the Qualitative Report as stated at the website of the Department of Forests.

- Are there any specific requirements for the **forest management plans** in terms of content, structure or criteria? If yes, please elaborate.

Article 18 of the Cypriot Forest Law defines a minimum content regarding management plans. Each forest management plan is based on data collected through mapping, inventory and other available data concerning forest resources and is consistent with the content of the National Forest Policy and the National Forest Plan.

Provided that, at the stage of preparation of each forest management plan, the views of the competent departments, agencies, local government authorities and farmers' organizations shall be taken into account.

Each forest management plan shall describe and evaluate all the elements of the area; define the objectives and management goals of the area; propose the measures required to achieve the management goals and objectives, covering all forest functions and uses, including the conservation, restoration and protection of nature, biodiversity and rare or important species of flora and fauna, recreation, tourism, support for local communities, landscape improvement, soil and water protection, protection of the forest from fires, harmful organisms and other degradation factors, afforestation, reforestation, forestry operations, production of timber, game and other products; and take into account development plans prepared under the Town and Country Planning Act, as amended or replaced from time to time, or other plans prepared under any other Law.

- Are there any **supporting mechanism for the management plans**? If yes, please elaborate.

No such mechanisms could be identified.

- Are **there impact assessment required** in your country in relation to the adoption of the forest management plans? What mechanisms are in place in your country to ensure that forest management plans are developed to ensure sustainable forest management practices? If yes, please elaborate.

No impact assessment is required according to Cypriot legislation, in relation to the adoption of the forest management plans.

With regard to the mechanisms in place to ensure that forest management plans are developed in order to achieve sustainable forest management practices, the following two mechanisms are in place according to Article 18(5):

- The Director of the Department of Forests sends a copy of the draft forest management plan to all interested government departments or agencies and seeks their views, which must be submitted no later than one month;

- The Director shall also organise at least one public presentation of the draft forest management plan, to which the affected local government authorities and non-governmental organisations shall be invited to participate.

- Are the **Natura 2000 sites plans already implemented and well-coordinated or integrated** with forest management plans? Are traditional forest activities recognized in those plans? Are there guidelines for small forest owners and managers on what they can and can't do?

With regard to the public forests located within the areas included in the Nature 2000 network, the Director of the Department of Forests has the competency of their management in accordance with the Article 20 of the Cypriot Forest Law.

For the public forests or part thereof, for which a management plan has been prepared and adopted, the management guidelines and other proposed measures contained therein shall be incorporated into the forest management plan of the affected public forest according to Article 20(2)(a).

The forest management plans for Nature 2000 network areas, after the process of sending a draft forest management plan to all concerned government departments or agencies and seeking their views, and after organizing a public presentation of the draft forest management plan, in which the affected local government authorities and non-governmental organizations are invited to participate, shall be submitted to the competent Scientific Committee as stated in Article 20(2).

6. Sustainable forest management.

6.1. Sustainable forest management definition and forestry practices

- Is sustainable forest management (SFM) defined in your country?

  ☐ Yes

  ☒ No

While Cyprus does not have a specific national definition of Sustainable Forest Management within its legislation, the country aligns with the Pan-European definition established by the Forest Europe Initiative.

According to the Helsinki Resolution, SFM is: "*the stewardship and use of forests and forest lands in a way, and at a rate, that maintains their biodiversity, productivity, regeneration capacity, vitality and their potential to fulfill, now and in the future, relevant ecological, economic and social functions, at local, national, and global levels, and that does not cause damage to other ecosystems*". [14]

Cyprus has taken this definition into account through its set of Criteria and Indicators for Sustainable Forest Management. The Department of Forests has elaborated and prepared this set of Criteria and Indicators for Sustainable Forest Management, based on the Improved Pan-European Criteria and Indicators, as prepared and adopted by the Forest Europe Initiative (Ministerial Conference on the Protection of Forests in Europe) in 2002.

- Does the definition of SFM include specific objectives?

  ☐ Yes

  ☒ No

While Cyprus does not have a specific national definition of Sustainable Forest Management (SFM) within its legislation, the country aligns with the Pan-European definition established by the Forest Europe Initiative. Cyprus has taken this definition into account through its set of Criteria and Indicators for Sustainable Forest Management. Within the document outlined these Criteria and Indicators for Sustainable Management of Cyprus Forests, it is mentioned that the National Forest Programme was prepared by the Department of Forests. This National Forest Programme outlines specific objectives for sustainable forest management, focusing on forest protection and development, sustainable management, and maximizing social benefits through multiple uses. These objectives guide Cyprus's approach to sustainable forest management, ensuring alignment with international standards and addressing national priorities.

- Does your country have specific guidelines **on Sustainable Forest Management**? If yes, are those mentioned in the legislation?

  ☐ Yes, they can be found here:

  ☒ No

  ☑Other sources defining or implementing Sustainable Forest Management

[14] Forest Europe website

While Cyprus does not have specific guidelines on Sustainable Forest Management enshrined in its legislation, the country has developed a comprehensive framework to promote Sustainable Forest Management through other means. The Department of Forests has formulated a set of Criteria and Indicators for Sustainable Forest Management in Cyprus, aligning with the Improved Pan-European Indicators adopted by the Forest Europe Initiative in 2002.

These criteria and indicators serve as a national framework for assessing and monitoring the sustainability of forest management practices in Cyprus. They encompass various aspects of forest conservation, including biodiversity, health and vitality, productive functions, and socio-economic benefits.

More detailed information can be found at the document titled "Criteria and Indicators for the Sustainable Management of the Cyprus Forests" which is available through the Department of Forests' official website.

Does your country have a **Forest Strategy and/or Forest Management Policy** setting policy priorities that implement a SFM approach?

☒ Yes, they can be found here: FOREST POLICY STATEMENT, FORESTRY DEPARTMENT, MINISTRY OF AGRICULTURE, NATURAL RESOURCES AND ENVIRONMENT, Nicosia, 2013

☐ No

- Other sources setting the Forest strategy/policy

- **Which requirements/obligations** result from the legally binding requirement for SFM?

1. For forest owners

As above-mentioned under Article 30 of Cypriot Forest Law, for a forest owners' organisation to be recognised, its members have the obligation to demonstrate that they are aiming to manage the forests sustainably and sustainable management must be supported by a relevant management plan. Otherwise, their application shall be rejected.

2. For forest managers

The Director as the manager of the forests according to Article 4 of the Cypriot Forest Law shall ensure the sustainable management and development of the public forests and shall also promote the sustainable management and development of the private forests.

Within this context, the Director has the obligation under Article 8 to ensure the preparation, adoption and implementation of the National Forest Policy on the sustainable management and development of forests and woodlands in Cyprus.

- Are **specific criteria and/or indicators** to determine whether SFM is being achieved? Where are they described (see table below)?

The Department of Forests has elaborated and prepared a set of Criteria and Indicators for Sustainable Forest Management in Cyprus, based on the Improved Pan-European Criteria and

Indicators, as prepared and adopted by the Forest Europe Initiative (Ministerial Conference on the Protection of Forests in Europe) in 2002. These criteria are: the conservation of forest resources and their contribution to the global cycle of carbon; the management of forest ecosystem, health, and vitality; the conservation and enhancement of forest productive functions; the conservation, maintenance and enrichment of forest ecosystem biodiversity; the conservation and enhancement of protective functions in forest management (mainly soil and water); the conservation of other socio-economic functions and conditions.

- Are some **forest managers implementing sustainable forest management practices voluntarily**? If yes, how are these voluntary management practices taking place? Through citizen initiatives, local initiatives, or other ways? Please explain how forest managers ensure that forest management practices are sustainable.

Upon research, no such information could be identified.

- Which mechanism are put in place to support the implementation of SFM? Which measures are in place to monitor implementation of the SFM?

Apart from the Criteria and Indicators for the Sustainable Management of Forests and the preparation of Forest Management Plans, in Cyprus the mechanism of Forest Inventories is identified, which aim to collect all the necessary data from the forests in order to rationally plan the management of the forests as well as to monitor the dynamic evolution of the stands.

The Forestry Department also adopts and implements measures, most of which are recurrent, aimed at adapting forest stands to climate change and reducing emissions and increasing greenhouse gas absorption. These measures can be grouped under three main pillars, as set out in the Forest Policy Statement:

1. Protecting forests from forest fires.
2. Adaptation of forests to climate change and enhancing the contribution of forests to climate change mitigation and the improvement of forests and greenery.
3. Improving and expanding forests.

Such measures are the following:

- The protection of Forests from illegal logging: on the implementation of Law 139(I)/2013, the placing of firewood on the domestic market is now controlled and penalties are provided for any unauthorized or illegal logging and/or placing of domestic timber on the market without a permit.
- Asbestos mine reclamation and reforestation as well as in cooperation with the Competent Authority (Mines Department) rehabilitation of abandoned quarries
- Protection of forests and improvement of their structure and resilience to climate change through the Rural Development Programme 2014- 2020

- Production in forest nurseries of drought tolerant plants (e.g. olive, carob, rope) to be used in afforestation or reforestation operations
- Participation of the Department of Forests in co-funded projects, the aim of which is the development of management tools that will aim at the protection, conservation and further upgrading of protected forest habitats.

In particular, the most recent Rural Development Programme 2014-2020 was prepared by the three cooperating competent authorities, namely: the Rural Development Programme Managing Authority 2014-2020, the Cyprus Rural Payments Organisation and the Department of Forests and was approved by the European Commission on December 3, 2015. The Measure 8.5 of the Programme includes the three (3) following Actions: The Measure includes the implementation of thinning in dense stands of afforestation/reforestation aimed at:

- Improving the structure of forests created by afforestation and/or reforestation.
- It will also help to adapt forest stands to climate change and reduce emissions and increase greenhouse gas removals.
- The implementation of targeted thinning is also expected to improve stability and resilience to other externalities as well as damage to forest ecosystems from drought, average temperature increases and prolonged heat waves (as a result of climate change).

All the above-mentioned information can be found at the website of the Department of Forests of the Ministry of Agriculture, Rural Development and Environment of Cyprus.

- Which forest management practices are required or prohibited by law in your forest/country? Please check below the proposed forest management practices and add supplementary ones if missing (Please include explanation of the legal requirements of the relevant techniques).

  ☐ Closer to nature silviculture practices
  ☒ Clear-cutting

According to Article 23 of the Cypriot Forest Law, the cutting of the top of the trunk of any tree or shrub growing on land outside the public forests is only permitted after a permit has been issued by the Director of the Department of Forests.

This provision shall apply to certain species when its diameter at a height of 130 cm above the ground is greater than 15 cm, to certain species when its diameter at a height of 130 cm above the ground is greater than 40 cm, to species included in the Christmas tree population, trees of the species Olive (Olea europaea), when the diameter of the trunk at a height of 130 cm above the ground is greater than 50 cm, and of trees belonging to the species Phoenix dactylifera L. (Phoenix dactylifera L, Washingtonia filifera), where the diameter of the bark of the trunk at a height of 130 cm above the ground is greater than 40 cm.

The transport of round-wood from any tree or shrub, including Christmas trees, shall be permitted only after a licence has been issued by the Director in accordance with the provisions of the Forest Law.

☐ Shelterwood system

☒ Selective logging

Likewise, as is the case for cutting, logging is also subject to a licensing system in accordance with Article 23 of the Cypriot Forest Law. Thus, logging is only allowed after a licence has been issued by the Director of the Department of Forests.

This provision shall apply to certain species when its diameter at a height of 130 cm above the ground is greater than 15 cm, to certain species when its diameter at a height of 130 centimetres above the ground is greater than 40 cm, to species included in the Christmas tree population, trees of the species Olive (Olea europaea), when the diameter of the trunk at a height of 130 cm above the ground is greater than 50 cm, and of trees belonging to the species Phoenix dactylifera L. (Phoenix dactylifera L, Washingtonia filifera), where the diameter of the bark of the trunk at a height of 130 cm above the ground is greater than 40 cm.

The transport of roundwood from any tree or shrub, including Christmas trees, shall be permitted only after a licence has been issued by the Director in accordance with the provisions of the Law.

☐ Afforestation and reforestation to enlarge forest areas

☐ Controlled burn

☐ Mandatory salvage logging

☐ Other

- Are there limitations on the management models to be applied, like clear-cuttings or their sizes? **Is there a ban on clear-cutting linked to SFM?**

According to Cypriot legislation any person, who is not authorized and acts without a permit issued by the Director of the Department of Forests and who in a public forest clears the forest, is guilty of an offense and, upon conviction, shall be liable to a term of imprisonment not exceeding 1 year or a fine not exceeding EUR 5 000,00 or both of these penalties, according to Article 37(a).

- Is there a **defined/legal target for forest land to be managed for conservation and species protection objectives in your country or region**?

The Cypriot Forest Law aims, inter alia, at the conservation, protection, sustainable management and development of forests and woodlands in the Republic of Cyprus.

Article 2 defines "forest purpose" as any purpose or act related to the creation, conservation, protection, forestry, management and development of forests or forest land.

However, the Law does not provide a more detailed and precise legal target for this purpose.

- Are there **forest owner obligations** related to **forest restoration** after harvest?

There is no such obligation under Cypriot law, nor can any relevant provisions be identified in the strategic plan or the forest policy statement.

6.2. "Closer-to-nature" guidelines and practices

(This section relates to the Commission Guidelines on Closer to nature forest management but also Commission guidance on payment schemes for forest ecosystem services, both aiming to provide information and guidance for sustainable forest management)

- Has your country incorporated the **newly published Commission guidelines** in their legal or regulatory framework?

Cyprus has not incorporated the recently published Commission guidelines into its legal or regulatory framework. Upon consultation of the website of the Department of Forests, no relevant actions are identified.

- Has your country **recognized under law/regulatory measure a closer-to-nature approach** in forest management? If yes, please provide the source where this is explained and elaborate below.

  ☒ Yes: in the Strategy that can be found here: https://www.cylaw.org/nomoi/enop/non-ind/2012_1_25/full.html
  ☐ No

In Cypriot legislation, and more specifically Article 15 of Cypriot Forest Law states that the Council of Ministers may declare any area of public forest as a natural stock, where the forest, which retains its naturalness, has not been significantly or permanently disturbed by human intervention and contains one or more representative or important forest ecosystems, plant communities, animal communities or other natural elements, and where human presence and activity is kept to a minimum in order to ensure the unhindered functioning of natural processes.

Accordingly, any area of public forest may be declared a national forest park where the forest, which retains to a significant extend its naturalness, contains important elements of biodiversity or genetic resources or landscapes and/or geomorphology, and is managed for the purpose of protecting and conserving the ecological processes and the significant natural elements it contains.

Those provisions can lead us to the conclusion that Cyprus has to some extend recognised under law measure a closer-to-nature approach in forest management.

- Does your country have legislation/measures setting **specific biodiversity targets/management objectives** for sustainable forest management at a national or regional level?

  ☐ Yes, at national level – they can be found here:
  ☐ Yes, at regional level – they can be found here:
  ☒ No

  Please describe them and elaborate:

6.3. Climate change and Forest carbon absorption

- Does your country have legislation/measures setting specific climate change targets or objectives for sustainable forest management at a national or regional level?

The majority of the measures that the Cypriot Department of Forests adopts and implements, are recurrent and aim to adapt forest stands (natural and artificial) to climate change and to reduce emissions and increase the absorption of greenhouse gases.

7. Forest land market

NOTE: The key objective is to identify and present information on the basic legal framework regulating market of forest land and inheritance processes.

- Are there specific legal requirements or limitations when selling and buying forest land?

No such specific legal requirements or limitations when selling and buying forest land are established. There are no special legal requirements or limitations when selling and buying private forest land. As regards public forest land, it belongs exclusively to the State and is not subject to sale. [15]

- Are there **limitations to divide** the land by selling or inheritances?

No such specific limitations to divide the land by selling or inheritances are established.

- Are there institutions/**bodies providing information** related to the forest land market?

No such institutions/bodies are established.

- Are there institutions/**bodies contributing to dynamize that market,** like forest land banks or advisory bodies (similar to the CAP advisory bodies) and others? Is there regular information on the amount of forest land transferred and the prices of transmissions? (Information on this market is usually missing)

No such institutions/bodies are established.

However, there is the provision of the Article 24 of the Administrative Regulatory Act 134/2012 for assessing the value of both public and private forest land for exchange purposes. This assessment is carried out by the Director of the Department of Cadastre and Land Surveying.

- Are there **regulations of forest land leasing**? Are they common with agricultural land or independent and with specific requirements?

Administrative Regulatory Act 134/2012 sets out detailed regulations for the leasing or other disposal of public forest land for different purposes. This Act is independent and exclusively dedicated to public forest land. There is a specific provision on leasing or disposal of public forest land for agricultural purposes.

- Are there obligations **and/or access to insurances for forest land or forest activities**?

No such provisions regarding obligations and/or access to insurances for forest land or forest activities are established.

- Are there specific regulations providing, **facilitating or limiting access to financial credits** for forest activities or mortgages on forest land?

No such regulation providing, facilitating or limiting access to financial credits for forest activities or mortgages on forest land were identifies under Cypriot legislation.

[15] Information provided by public authorities (Interview with Authority, 24.01.2025).

8. Forest companies, Forest incentives and taxation.

Forest Companies

- Is there a **register of forest industries**? Is there a **register of forest contractors**?

According to Article 62 of the Cypriot Forest Law, the Director of the Department of Forests of the Ministry of Agriculture, Natural Resources and Environment may set up a Register of Forest Enterprises and Forest Product Traders and require a forest enterprise or forest product trader to register there.

- Is there any specific **regulation on forest ownership, forest cooperatives or other types of forest companies, or are they all regulated under the** Company Law?

The regulations on ownership of private forests, private forest owners' organisations and forestry enterprises and forest product traders are part of the Cypriot Forest Law.

- Do **small forest owners have access to the status of forest companies**?

Cypriot legislation does not distinguish between big and small forest owners. There is also no explicit exclusion of forest owners from the status of forest companies. Therefore, we can conclude that small forest owners have access to the status of forest companies under Cypriot legislation.

Forest incentives and taxation

In Cyprus there are no incentives for the management of private forests related to tax breaks, discounts, bonuses or non-financial benefits.[16]

- Are there **effective subsidies** for forest owners and managers to implement SFM? And/or to carry out biodiversity conservation measures? If it does exist, please compare the total amount paid at national level in the last 3 years with available information with the amount defined as necessary at the Prioritised Actions Framework.

No specific subsidies for forest owners and managers are foreseen.

- What taxes are applicable to Forest companies and forest owners?

There is no such provision in Cypriot law.

[16] Information provided by public authorities (Interview with Authority, 24.01.2025).

9. Enforcement: Forest control and penalties.

- Are there specific measures in place to enforce compliance with the legal requirements on forest management?

  Please list only the legislative measures including the responsible body that are specific to forest management requirements.

Measures to enforce compliance with the legal requirements for forest management are provided by Cypriot Forest Law.

The Law defines a number of offenses which may carry a penalty of imprisonment or a fine, or both of these penalties. More specifically, the offenses prescribed by law are the following: offenses relating to fires (Article 32), offenses relating to illegal logging, cutting or damaging forest product and illegal transportation of round-wood (Article 33), offenses relating to the possession of illegally obtained forest product (Article 34), offenses relating to the sale of illegally obtained forest product (Article 35), offenses relating to the illegal entry of animals (Article 36), offenses relating to the placing or abandonment of vehicles or machinery in a public forest (Article 38), offenses relating to the interference with or destruction of a sampling surface or data (Article 39), and offenses relating to the falsification of signs or documents (Article 41).

The Cypriot Forest Law, also, sets out a list of actions which, when carried out without permit, also carry a penalty of imprisonment or a fine or both. These actions are in accordance with Article 37 of the Law the following: Clearing, digging, cultivating, planting, seeding, filling, or excavating land or depositing or disposing of any material; erecting any building, fence, stall, kiln, sign, advertisement or poster or any other permanent or temporary structure; drilling boreholes, digging wells, digging water ditches, laying pipes, constructing sluices, erecting water tanks, diverting or otherwise using any water therein, or owning or using, for any purpose, any land or forest building located in a state forest, intervening, destroying or in any way causing damage to any forest building; interfering, cutting off, destroying or in any way causing damage to any forest telephone; interfering, destroying or in any way causing damage to or obstructing traffic on a forest road, dumping, depositing or accumulating any skim, litter, sewer water or any other hazardous toxic liquid or substance, driving a motor vehicle of any type off a forest road thereby causing damage to forest vegetation and/or soil or intentionally or negligently causing by any means or act any damage or degradation to any part, function, or value of a public forest.

To enforce compliance with the forestry law, Article 40 of the Cypriot Forest Law classifies the following breach of the legislation on the part of a forest product trader or a private forest owner as an offense punishable by a fine: not complying with any indication of the Director regarding registration in the Register of forestry enterprises and forest product traders or the Register of Owners of Private Forests owners, or not providing the Director with any information or not assisting the Director with respect to the record keeping obligation.

There is also provision for the control of trafficking in public forests in Article 44. Particularly, it is provided that the Minister may regulate or prohibit the entry- (a) into a designated area of a public forest where the entry of any person is likely to endanger the conservation of the public forest or biodiversity, and (b) into sampling plots established for experimental purposes in any area. Any person who violates this regulation or prohibition is guilty of an offense and, upon conviction, is liable to a term of imprisonment or a fine or both of these penalties.

In order to ensure the orderly performance of the duties of persons performing duties of a forest officer in the Department of Forests, Article 51 of the Cypriot Forest Law provides that any person who assaults or obstructs any forest officer or member of the police in the performance of any duty shall be guilty of an offense and a penalty of imprisonment or a fine, or both, may be imposed on conviction.

The Cypriot Forest Law also provides in Article 54 that in case of an offense committed by a legal entity or by a person acting on behalf of a legal entity and proven that the offense was committed with the consent, connivance or approval or with the assistance or negligence of a director, manager, secretary or any other individual who appears to be acting in such capacity, such individual shall also be guilty of the offense committed by the legal entity.

Additionally, violation of the rules issued by the Director for the purpose of protection, conservation and proper management of any natural reserve, national forest park, protected forest, forest park, forest monument, natural micro-reserve and forest recreation area may impose a penalty or a fine or both of these penalties according to Article 66(1)(3).

Prosecutions for offenses in breach of the Forestry Law and Regulations issued under it, shall be brought in the name of the Director of the Department of Forests of the Ministry of Agriculture, Natural Resources and Environment in all Courts and in accordance with the instructions of the General Prosecutor of Cypriot Republic as set in Article 43.

10. Conclusions

10.1. Legal or regulatory barriers for SFM

- What are the main legal and regulatory barriers and enablers affecting the implementation of SFM in your country?

Firstly, the definition of sustainable forest management is absent and with it the precise objectives, which could lead to more awareness, not only for citizens, but also for forest sector workers, private forest owners, forest product traders, hunters and anyone else with a legitimate interest.

Moreover, it can be said that the Cypriot Forest Law dating back to 2012, despite the 2018 amendment, is not in line with modern European tendencies in sustainable forest management. This also reflects on the fact that recent EU Guidelines on the issue have not been transposed into Cypriot law.

With regard to forest management practices, it can be observed that while they exist to some extent, they do not cover all forestry activities. Closer to nature silviculture practices, shelterwood system, afforestation and reforestation to enlarge forest areas, controlled burn, mandatory salvage logging, are some of the areas that could be further developed in accordance with sustainable forest management requirements.

Furthermore, the absence of effective subsidies for forest owners and managers to implement SFM can be seen as a regulatory barrier and affecting the implementation of sustainable forest management.

It should also be noted that difficulties can arise from the gap in legislation and regulations regarding measures that could set specific biodiversity targets/management objectives for sustainable forest management.

Lastly, it arises that there is no information on whether some forest managers are implementing sustainable forest management practices voluntarily. Recording such practices could enhance the sharing of good practices in the sector.

- Are there specific legal and regulatory barriers or challenges to implement a closer-to-nature approach in forest management in your country?

Although there is a certain degree of tendency in legislation and practice in Cyprus towards a close-to-nature approach in forest management, some legal and regulatory barriers or challenges are identified.

Regarding forest management practices, there are no established forest practices in Cyprus that are close to nature. This is a challenge that makes it difficult to take a closer-to-nature approach to forest management for both the managers and the owners of the forests.

Cyprus has not transposed the recent Commission guidelines into its legal or regulatory framework. Upon consultation of the website of the Department of Forests, no relevant actions are identified. And this should be considered as a major barrier and challenge to implement a closer-to-nature approach.

- What are the main legal drivers for implementing a closer-to-nature approach in forest management for relevant actors?

As mentioned above under 10.1, Cyprus has not incorporated into its legal system the recent guidelines of the European Union on a close-to-nature approach for forest management.
However, there is a provision in Cypriot legislation that can act as a legal driver for the implementation of a closer-to-nature approach to forest management.

Article 15 of the Cypriot Forest Law states that the Council of Ministers may declare any area of public forest as a natural stock, where the forest, which retains its naturalness, has not been significantly or permanently disturbed by human intervention and contains one or more representative or important forest ecosystems, plant communities, animal communities or other natural elements, and where human presence and activity is kept to a minimum in order to ensure the unhindered functioning of natural processes.

Accordingly, any area of public forest may be declared a national forest park where the forest, which retains to a significant extent its naturalness, contains important elements of biodiversity or genetic resources or landscapes and/or geomorphology, and is managed for the purpose of protecting and conserving the ecological processes and the significant natural elements it contains.

Those provisions can lead us to the conclusion that Cyprus has to some extent recognized under law measure a closer-to-nature approach in forest management.

10.2. Legal or regulatory gaps in national forest legislation

Please provide key conclusions based on the information referred to in previous sections.

- **Absence of specific biodiversity and climate change targets**

Cypriot legislation does not set specific biodiversity conservation targets or climate change adaptation objectives for sustainable forest management. While some measures are taken to apapt climate change, their scope and objectives are not explicitly defined in the legislation.

- **Absence of financial incentives**

There are no subsidies or financial incentives for forest owners or managers to implement sustainable forest management. This gap limits the ability of stakeholders to fund sustainable practices.

- **Gaps in forest land market legislation**

There are no specific legal requirements or limitation regarding selling, buying, or inheriting forest land. This absence of regulation can lead to fragmentation of forest land and inefficient management due to uncoordinated ownership patterns.

- **Lack of distinction between small and large forest owners**

Cypriot legislation does not distinguish between small and large forest owners in terms of their rights, responsibilities, or access to support. This one-size approach may not adequately address the unique challenges faced by small-scale forest owners.

- **Absence of monitoring and reporting framework**

There is no regular reporting on some important issues like the condition of the forest land, the market value of the forest land, the effectiveness of implemented sustainable forest management measures. This lack of transparency and data records limits informed decision-making and enforcement.

- **Insufficient focus on private forests**

The legal framework focuses on public forests, with less emphasis on the sustainable management and conservation of private forests, which may lead to inconsistencies in how forests are managed across ownership types.

- **Limited enforcement mechanisms for private forests**

Enforcement mechanisms, penalties, and compliance measures are well-developed for public forests but are less stringent or unclear for private forests, potential leading to unsustainable practices.

- **No provision for responsible body for forest land market**

There are no institutions specifically tasked with regulating or providing data on forest land markets. The only related provision is for land value assessment by the Department of Cadastre and Land Surveying.

- **Lack of integration with environmental policies**

Forest legislation does not appear to be fully integrated with other national environmental policies, such as those addressing water management, agriculture or urban planning, that are critical for a holistic sustainable forest management.

- **Absence of transposition of the recent European guidelines**

As mentioned above under 10.1, the latest European guidelines reflecting the latest trends in sustainable forest management have not been incorporated into Cypriot law.

National experts on forest legislation and references

- **Please provide the names and contacts of 3 to 5 experts in forest legislation in your country**,

  - Pantelitsa Sfiniadaki, P.Sfiniadaki@euc.ac.cy, +35722559574, Lecturer, Administrative Law with specialization in Environmental Law and Climate Change, European University Cyprus,
  - Savvas Iezekiel, director@fd.moa.gov.cy, +357 22 805511, Director of the Forestry Department, Ministry of Agriculture, Rural Development and Environment of Cyprus,
  - Savvas Antrea, sandrea@fd.moa.gov.cy, +35722805517, Senior Forest Conservator / Planning and European Affairs Section, Forestry Department, Ministry of Agriculture, Rural Development and Environment of Cyprus.

- Provide **key books or articles analysing the national and/or regional forest legislation** in your country, particularly if they compare it with other countries, if they analyse the effect in actual management of SFM.

No books or articles analysing the national and/or regional forest legislation in Cyprus have been found.

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