

Report for AF&PA

**Trade and Environment
Program in Europe**

October 2000 Report

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“INFORMING THE SUSTAINABLE WOOD INDUSTRY”

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Technical Report for October 2000

Highlights and Commentary

Last month's report concentrated on the rapid uptake of PEFC certification in Europe, which has increased to around 23.5 million hectares over the last year. This month, to redress the balance, the focus is placed on the alternative FSC framework. FSC has gone a long way over recent years to answer its critics – for example by introducing greater balance between environmental and commercial interests in decision making, and by refining its accreditation procedures to meet ISO's international guidelines. However, recently released data on the current area of certified land suggests FSC is now suffering from the strategic error it made during its early development to alienate the private forestry community in Europe and North America. During 1998 and 1999, FSC certified forest area increased by over 6 million hectares per annum. This year the increase is likely to be little more than 3 million hectares. Large swathes of relatively well managed private forest in the developed world now seem effectively closed to further significant expansion of FSC certification as these areas concentrate on other certification programmes. The result is that FSC is having to focus more on state forest land, particularly in tropical areas and in Eastern Europe. Developing certification in these regions will be a long uphill struggle – so it seems likely that the rate of expansion of FSC certified forest will continue at a slower rate over the next few years.

Prospects for FSC on the market side also appear mixed. In Europe, although the FSC brand is still favoured by retailers, it has lost momentum as some of the largest buying organisations now seem willing to accept the PEFC alternative. The progress of the FSC brand appears to have been stronger in North America over recent months with the announcement by various high profile retailers of their commitment to FSC certification – although many of these also seem ready to accept alternatives.

Much now hinges on FSC's attitude to the developing debate on mutual recognition of forest certification schemes. As recent comments by the Purchasing Director of France's largest joinery firm, La Peyre, seem to suggest, European retailers are increasingly calling for FSC to work constructively towards mutual recognition with alternative certification schemes like PEFC and SFI. FSC now appears to have two clear policy options:

- FSC could decide not to participate in the mutual recognition process now being developed by organisations like the International Forest Industry Roundtable (IFIR) and PEFC. Instead it could retain its commitment to relatively high performance standards in line with the FSC Principles and Criteria, and continue to insist that it will recognise only those national initiatives developed according to FSC procedures. If so, then FSC seems set to play a less dominant – although still important - role in the debate. It would tend to be forced into a lower volume niche market for wood of high environmental pedigree. As such it could play a role in developing, for example, markets for lesser known tropical species – perhaps more in line with FSC's original intent.
- or FSC could take a leading role in the evolving mutual recognition debate. If FSC is serious about satisfying retailer demands for large commercial volumes of certified products, then this would appear to be the only realistic option. However, to adopt this approach, FSC would need to be more flexible in recognising alternative national forest certification frameworks.

At present, public pronouncements from the FSC and World Wide Fund for Nature (WWF) suggest that FSC leans much more towards the former approach. However more will be known after the next international mutual recognition workshop – at which FSC have been asked to speak – which is being held in Brussels at the end of November.

1 Meetings

1.1 IFIR Working Group Meeting on Mutual Recognition of Forest Certification Schemes

The International Forest Industry Roundtable (IFIR) Working Group met in Australia between 24 and 27 October to discuss the IFIR report finalised in June on the development of an "international mutual recognition framework system" for forest certification. The IFIR report had established a draft set of Principles for international mutual recognition of credible national (or regional/sub national) certification schemes, and made preliminary proposals regarding possible institutional frameworks. Since June the report

had been subject to independent review. The major recommendations coming out of the independent review were that:

- IFIR's Principles and Elements of credible forest management certification schemes should be reformatted into a single set of Criteria and Indicators (C&I) to be used as an objective benchmark for assessing the credibility of certification schemes. A draft set of Criteria and Indicators was prepared for discussion at the Australia meeting;
- there should be reduced emphasis in the international framework on full compliance with environmental management systems standards like ISO14001. This proposal is in recognition of those forest certification schemes designed for smaller owners that do not require full compliance with ISO14001 on grounds of cost;
- there should be increased emphasis on ISO's published guidelines for accreditation and certification bodies. This proposal reflects the importance of effective institutional frameworks to ensure certifiers are independent and competent;
- IFIR's mutual recognition framework should increase its emphasis on the contribution of forest certification to sustainable forestry on the ground. The framework should require certification schemes to evolve procedures to monitor and assess the impact of certification on forestry practices.

The IFIR Working Group agreed at the meeting to adopt the "Criteria and Indicators" format. A sub committee has been established to improve the organisation and content of the C&I. The final draft of the C&I will be presented to the next international seminar on mutual recognition to be held 28-29 November in Brussels (see 1.3 below).

1.2 ITTO Meeting, Yokohama, Japan, 30 October – 4 November

Early reports from the Yokohama meeting of the International Tropical Timber Organisation (ITTO) suggest that ITTO's secretariat is hoping to reinvigorate momentum towards sustainable forest management in the tropics. Speaking at the opening of the meeting, ITTO's Executive Director Dr Manoel Sobral Filho proposed six achievable, measurable, medium-term targets:

- the establishment of 20 additional demonstration areas for sustainable tropical forest management (ITTO has already established 35 of these areas in 18 tropical countries);
- the establishment of reduced-impact-logging training schools in each of the three tropical regions with the ability to train hundreds of logging professionals;
- the production of annual reports on the status of sustainable forest management at the national level applying the ITTO criteria and indicators for sustainable forest management;
- the assessment of sustainable forest management in 500 forest management units using the ITTO criteria and indicators;
- the development of guidelines for the rehabilitation of degraded tropical forests and a project program in place to rehabilitate 1 million hectares;
- the expansion of ITTO-sponsored transboundary conservation reserves to a worldwide area of 15 million hectares.

Also at the opening session, the government of Indonesia requested ITTO's help to strengthen the capacity of its members to address illegal logging and the undocumented timber trade. This issue is of central importance to Indonesia where some reports suggest that up to 50 million m³ of wood are illegally extracted each year. In a statement to the meeting, Indonesia's Junior Minister of Forestry said that, unless addressed, illegal logging would jeopardise all current efforts to promote sustainable forest management in Indonesia and elsewhere.

1.3 Future meetings

Two further relevant meetings will be held over the coming weeks:

- A second international seminar on mutual recognition of forest certification schemes, to follow-up the first seminar arranged by the PEFC in June 2000, will be held in Brussels on 29 November. The seminar is being hosted by the Confederation of European Paper Industries (CEPI).
- The FSC are holding their 2nd Annual Conference 9 -13 November. The focus of the meeting will be a discussion of three issues: indigenous people, community forestry, and workers' rights.

2 Forest certification developments

2.1 An update on the Forest Stewardship Council (FSC)

2.1.1 FSC certified forest area

The most recently released FSC data on certified forest area suggests that the scheme's rate of growth may be slowing. Between FSC's establishment in 1993 and the end of 1997, the area of certified forest increased relatively slowly to around 4 million hectares. The rate of growth accelerated over the next two years, with certified forest area hitting 10 million hectares by the end of 1998 and 17 million hectares by the end of 1999. However this year the area of FSC certified land looks set to rise by only around 3 million hectares to a total of 20 million hectares.

Closer analysis of the data (Tables 1 and 2) reveals that while a number of large forest areas have been newly certified over the last 12 months, these gains have been partly offset by the withdrawal of other areas from the FSC process. Significant areas of newly certified forest since August 1999 include:

- nearly 1 million hectares of United States forest land in various different ownerships – the most notable gains being Cass County Land Department (250,000 hectares), the Irving Woodlands Allagash Timberlands (230,000 hectares), and the New York State Dept. of Environmental Conservation (285,000 hectares).
- around 941,000 hectares of Forest Enterprise state forest plantations in the UK (mainly of exotic sitka spruce);
- around 330,000 hectares of industrial plantation in South Africa – including a large section of the Mondi forest together with plantations owned by SAPPI and the NCT co-operative;
- a further 140,000 hectares of Swedish industrial forests and around 1 million hectares of state forests (note the latter are not included in table 1 because certificates were being finalised as this report was being prepared);
- a further 278,000 hectares of Bolivia's tropical rain forest estate;
- around 200,000 hectares of Ukrainian government woodland;
- a 166,000 hectare tract of privately owned Croatian forest;
- 146,000 hectares of Fletcher Challenge forests in New Zealand;
- around 144,000 hectares of German state owned forests;
- and around 70,000 hectares and 75,000 hectares of community tropical forests in Guatemala and Mexico respectively.

Areas which have been withdrawn from the FSC certification program over the last 12 months include:

- 1.2 million hectares of natural woodland in Zambia;
- the 191,000 hectare JD Irving Black Brook District in Eastern Canada;
- 16,000 hectares of natural tropical forest in Paraguay

Although western Europe is still host to the largest area of FSC certified forest, the rate of growth has slowed particularly significantly in this region since August 1999. This reflects the region's focus on the alternative Pan European Forest Certification (PEFC) scheme which has, over the same period, certified 23.5 million hectares. The scope for further large scale FSC certification in Western Europe seems limited, now that the industrial and state forests of both Sweden and the UK are nearly 100% certified. However there may be greater scope for further growth of FSC certification in the relatively large tracts of state owned forest in Eastern Europe – particularly as these countries are now seeing rapid expansion of wood processing plants to supply relatively low cost finished and semi-finished products to retailers in Western Europe.

FSC is also increasingly focusing efforts on promoting forest certification in areas of the developing world. Countries where the FSC is making reasonable headway include:

- Brazil – the Governor of the state of Acre has announced that the forest of Antimari covering 66,000 hectares will work towards FSC forest certification. The forest will mainly supply certified timber to local markets. In the longer term, the Acre government is also aiming for 25% of the state's forests to be certified – a total of nearly 4 million hectares. The State of Acre has also made commitments to the purchase of certified timber and is a member of the Brazilian WWF Forest and Trade Network "Compradores de Madeira Certificada".
- Bolivia is the first tropical country to have developed a set of FSC endorsed certification standards. It already has 719,000 hectares of FSC certified forest. However the strength of regulatory control required for FSC certification in Bolivia has forced the industry to severely curtail production of the valuable mahogany species and instead focus on lesser known tropical wood. Bolivia's marketing efforts are focused on expanding sales of FSC certified products manufactured from lesser known

- species, particularly in N. America and Europe.
- Malaysia has been busy developing an independent national forest certification scheme for some time, but has also been involved in negotiation with FSC towards eventual mutual recognition. Although recognition from FSC still seems some way off, officials from the Malaysian National Timber Certification Council are meeting with FSC in December to discuss the possible establishment of an FSC National Working Group.
 - Indonesia's LEI forest certification scheme has for the last two years been operating on a pilot basis under an official Memorandum of Understanding with FSC designed to provide the foundation for eventual mutual recognition between the two schemes. At present, FSC and LEI certifiers are working together on forestry auditing in Indonesia
 - Ghana has developed independently a forest certification standard drawing to some extent on the FSC Principles and Criteria. Although no formal announcements of links between FSC and the Ghanaian certification scheme have been made, the Chairman of the Ghanaian standards setting body became FSC's official contact person in Ghana during June this year – hinting at closer co-operation in the future.

2.1.2 Status of FSC regional standards

In theory, FSC certification should be based on national (or regional/sub national) standards that have been developed through FSC National Initiatives designed to encourage broad stakeholder participation. In practice, in most areas of the world, FSC certification continues to rely on "interim" forest standards developed by FSC accredited certification bodies which are broadly in line with FSC's International Principles and Criteria for Good Forest Management. To date, the FSC has endorsed only 6 national standards in the United Kingdom, Sweden, Bolivia, Canada (Maritimes), Belgium, and Germany. However FSC claims to have established working groups to develop standards in a wide range of locations as follows: 3 more regional groups in Canada (Great Lakes/St. Lawrence, British Columbia, and Boreal); 7 regional groups in the United States (Northeast, Ozark-Oachita, Southeast, Mississippi Alluvial Valley, Southwest, Pacific Northwest, and Rocky Mountains); Mexico; Nicaragua; Colombia; Peru; Ecuador; Chile; 2 groups in Brazil (Amazon and Plantations); Ireland; Belgium; Denmark; Netherlands; Spain; Estonia; Latvia; Russia; Poland; Hungary; Romania; New Zealand; Papua New Guinea; Indonesia; Vietnam; Cameroon; Ghana; and Zimbabwe.

2.1.3 Refinement of FSC Accreditation Procedures

A criticism that has been levelled against FSC in the past is that the organisation operates outside ISO's international framework for accreditation and recognition of certification bodies. The FSC has sought to overcome this criticism through the progressive refinement of its accreditation procedures. Procedures for accreditation of certification bodies are set out in a 204 page "accreditation manual", first published in January 1998 and subject to regular revision. FSC claim that their accreditation procedures are now fully compliant with relevant ISO Guidelines. FSC has also applied for membership of the International Accreditation Forum (IAF), a body which aims eventually to harmonise accreditation procedures for quality assurance certification. FSC has so far been unable to join as IAF rules only allow members from the formal ISO framework. IAF is currently engaged in a review of its membership guidelines which may result in an opportunity for FSC to join. However, FSC is now a member of ISEAL (International Social and Environmental Accreditation and Labelling Alliance) which works to attain credibility for the accreditation activities of its members and to pursue continuing improvement to those services. Further information on ISEAL is available at www.isealliance.org

2.1.4 Administration

FSC is currently undergoing re-organisation with the aim of ensuring the organisation can take a "leadership role" in the overall certification debate. Some decision making powers are being decentralised to FSC National Initiatives, while the secretariat's skeletal staff is being expanded to include a second Executive Director to focus on administration and fundraising. Someone may also be hired to specialise in small forest owners and businesses.

2.2 Germany

Both PEFC and FSC certification are proceeding apace in Germany. In Lower Saxony, declarations of commitment to PEFC certification have been signed which cover Land (state) forests totalling 325,000 hectares, Federal forests totalling 46,000 hectares, and Municipal forests covering 2,700 hectares. Similar declarations have also been signed by private forest owners including FBG Egestorf-Hanstedt (6,500

hectares) and FBG Grafschaft Hoya (6,700 hectares).

Meanwhile, in mid-September, SaarForst-Betrieb became the third German State Forest Company to qualify for an FSC certificate. The certificate covers around 39,000 hectares. FSC certificates were also awarded in mid-September to the 4150 hectare municipal forest of the Bavarian city of Lohr, and further certificates are anticipated for two municipal forests in the State of Brandenburg; Templin covering 3350 hectares, and Lychen covering 1,023 hectares.

2.3 Italy

With only limited forest resources of its own and a furniture manufacturing sector which is a major player on international markets, Italy is one of Europe's largest wood importing nation's. Until recently, forest certification had hardly impacted on the Italian forest products sector. Interest however is now on the rise, partly driven by the WWF's efforts to establish a WWF "Forest and Trade Network" in the country, and by pressure from Italy's major European export markets for certified wood.

At present Italy has only one FSC certified forest of around 11,000 hectares, a natural state owned forest in the northern part of the country. A working group is in the early stages of developing FSC certification standards for northern Italy.

Italy is now also developing a PEFC forest certification scheme. PEFC documentation has been translated into Italian and the process has been initiated to establish a PEFC Board. The process is being led by FEDER-FORESTE, the national organisation representing woodland owners and forest municipalities.

ISO14001 certification is proving popular in Italy, although not so much in the wood sector. By May of this year, 410 ISO14001 certificates had been issued, of which only two were to wood products companies.

2.4 Guyana

Guyana, a country sandwiched between Brazil and Venezuela, has forest lands covering around 75% of land area. The forests are fairly remote and difficult to manage – being subject to a prolonged wet season and comprising a relatively low density of high value tropical species. Nevertheless Guyana is a leading supplier to international markets of greenheart lumber – a dense durable tropical wood for heavy duty applications such as sea defence work – and a minor supplier of plywood. Like some other tropical nations, Guyana's forest sector has undergone a complete restructuring over recent years with the aim of improving regulation and moving towards sustainable forestry. Discussions have also been initiated on forest certification.

In July of this year a National Forest Certification Workshop was convened by the Guyana Forestry Commission (GFC). During the workshop, Guyana's Forest Minister noted that, with help from the UK government and the Canadian International Development Agency, the GFC had introduced a code of practice for forestry operations and established an environmental monitoring unit to enforce standards. It had also introduced a requirement to undertake an environmental impact assessment for all significant forestry and forestry related operations. Furthermore, all wood sector companies operating in Guyana are now required to develop and implement environmental management plans which are monitored by the Protection Agency in collaboration with the GFC. Participants at the July workshop devised an action plan designed to define the approach the country should take on forest certification, and placed the process in the hands of an interim working group.

3. Certified forest products - market developments

3.1 American Hardwood Export Council (AHEC) Convention

Although market issues formed the focus of this year's AHEC's European Convention in Brussels in early November, the environmental issue was widely discussed:

- Jean-Paul Chevreton, Director of Purchasing of the La Peyre group, France's leading joinery company and one of the country's largest buyers of wood, said that the group had established the target of purchasing 100% forest products from either certified or "replanted" forests within the next 5 years. He noted his support for PEFC and said that rapid mutual recognition between North American certification systems and the PEFC was essential. He claimed "it is not possible for the market to accept too many schemes".

- The AHEC Chairman, Mr Paul Webster, noted in his introduction that the United States now boasts 69 million acres of certified forest through the SFI programme and said that SFI had also ensured that 44,000 loggers had received training in sustainable forestry practices. He said that American hardwoods are coming under increasing competitive pressure from Eastern European hardwoods due to the current strength of the dollar, but noted his suspicion that much of the latter derives from unsustainable sources. Against this background he called for the continuing support of European importers for American hardwood.
- Ed Pepke of the UN/ECE Timber Committee in a wide ranging report on European hardwood markets, included reference to the Timber Committee's conclusions on certified forest products. He particularly highlighted the central role in the current debate of mutual recognition between forest certification schemes.
- Several US hardwood producers at the meeting noted in open forum that they were unlikely to pursue forest certification unless there were clear market advantages both in terms of a price premium and increased market share. They also referred to the difficulties of managing chain of custody for US non industrial private owners.
- In response, a German timber agent expressed the view that underlying demand for certified forest products in Germany is in fact decreasing. However he noted that by the end of next year the majority of wood traded in Europe will be certified, creating an entirely new market situation. To maintain market share, US exporters will have to provide equivalent assurances of sustainable forestry "*with a 100% guarantee there will be no price premium*".
- Environmental issues also played a prominent role during the country "break-out" market discussions. The discussion on market conditions in Italy began with a plea from Italian importers for a clear and coherent US position on forest certification. They noted that different producers' commitment to various schemes including SFI, ISO14001, and FSC created confusion amongst buyers and disrupted an otherwise positive environmental message. In a similar vein, UK importers called on the United States industry to take a lead in the certification debate. Furthermore, they suggested the industry now needs to recognise that forest certification is here to stay and that it should accept certification as an essential requirement for continuing market access.

3.2 Amazonian plywood

An area of forest covering 41,000 hectares managed by of Amazonia's largest plywood producers, Gethal Amazonas, has been awarded an FSC certificate. The area is unable to supply the company's full requirement for FSC logs, but volumes will be supplemented by the company's other properties. Gethal started as a typical Amazon timber company buying from third party log suppliers. However since 1999, Gethal has been working to increase log supplied from forests managed by the company. The company is a leading supplier of plywood to Europe – notably the UK.

3.3 Lesser known tropical species

Just World Trading (JWT), a small Edinburgh based company, is the only UK timber agency specialising in the marketing of certified wood products. The organisation focuses on sourcing FSC certified secondary tropical species for supply to members of the UK's WWF 1995+ Group. Part of JWT's mission is to enable small local communities to attain market entry for their forest products. In a recent article in the UK's Timber Trade Journal, John Canning of JWT suggested that "*As a result of the WWF Global Trade Fair [in London during June] there has been a lot of interest in FSC-certified secondary species. I estimate that there have been meaningful inquiries for around 600m³ of lumber a month. To cope with this sudden demand I am working with several organisations and this has awakened the traditional timber producers to the attractive market that exists for secondary species.*"

JWT is currently working closely with Railtrack, the private utility company responsible for maintaining the UK's railways, to obtain hardwood sleepers from FSC sources. Each year Railtrack buys 40,000 hardwood sleepers, mainly of karri and ironwood from South Africa, and other high density species from Guatemala and Brazil. Railtrack has said that by mid-2001 all these sources will be FSC-certified. JWT has identified a relatively plentiful alternative tropical red hardwood, Santa Maria, which it claims compares favourably with West African species of sapele and utile. Railtrack has now accepted this species for use as sleepers. JWT is also sourcing secondary species for the UK market – notably Santa Maria – as kiln dried export quality (FEQ) grade lumber and targeting the joinery market. However the volumes involved remain relatively small.

4. Environmental issues

Negative environmental campaigning against the wood industry in Europe continues to be relatively low profile. Over recent weeks, two exporting countries have been targets for green campaigning: Brazil and Canada. AEIM - the Spanish timber trade federation – reports that Greenpeace continue to focus critical publicity campaigns on Spain's imports of Brazilian hardwood – mainly lower value species such as Jatoba for flooring. Meanwhile, according to an article in the UK's Timber Trade Journal, Greenpeace have renewed their letter writing campaign to wood buyers in Europe telling them to boycott timber from British Columbia. Customers of Weyerhaeuser in Germany were specifically targeted. Weyerhaeuser says that the letter effectively marks Greenpeace's withdrawal from the peace accord signed by BC environmentalists and timber companies in the spring. The deal saw four timber companies - Western Forest Products, Weyerhaeuser, Canfor and Fletcher Challenge Canada - agree to an 18-month moratorium in logging in disputed areas.

The World Wide Fund for Nature continues to issue regular press releases aimed at raising the profile of FSC – most recently a story about the Pope blessing a box made from FSC certified wood.

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Table 1. FSC certified area in August 1999 and October 2000

Country	August 1999 total area (ha)	October 2000 total area (ha)	% Change in area 1999/2000	Natural area (ha)	Semi-natural area (ha)	Plantation area (ha)	Mixed area (ha)
Africa	1842872	974137	-47.1	150270		822409	1458
Namibia	49000	54420	11.1	54420			
South Africa	495322	828128	67.2	71000		755670	1458
Zambia	1273700		-100.0				
Zimbabwe	24850	91589	268.6	24850		66739	
Asia	130087	140087	7.7	55083		75004	10000
Indonesia	62278	72278	16.1			62278	10000
Malaysia	55083	55083	0.0	55083			
Sri Lanka	12726	12726	0.0			12726	
Australasia/ Oceania	90941	195827	115.3	9773		148054	38000
New Zealand	45025	148605	230.0	551		148054	
Pap. New Guin.	4310	4310	0.0	4310			
Solomon Islands	41606	42912	3.1	4912			38000
E. Europe	2334454	3155800	35.2	2296710			859090
Croatia		166861	NA	166861			
Czech Republic	10441	10441	0.0				10441
Poland	2324013	2742786	18.0	2129849			612937
Russia		32712	NA				32712
Ukraine		203000	NA				203000
Latin America	1380720	1809380	31.0	1060860	86215	599262	63043
Belize	95800	95800	0.0	95800			
Bolivia	440933	718752	63.0	688752			30000
Brazil	653275	665558	1.9	80571		584987	
Costa Rica	29035	40153	38.3	4746		14275	21132
Guatemala	32619	100026	206.6	100026			
Honduras	18127	19876	9.6	19876			
Mexico	94908	169215	78.3	71089	86215		11911
Panama	23		-100.0				
Paraguay	16000		-100.0				
N. America	1758868	2544863	44.7	2222442	16903		305518
Canada	211013	28015	-86.7	28015			
USA	1547855	2516848	62.6	2194427	16903		305518
W. Europe	9002273	10280813	14.2	59713	8802501	118386	1300213
Belgium	4342	8684	100.0				8684
Denmark		36	NA	36			
France		1050	NA			1050	
Germany	23615	167821	610.7	2258	113527		52036
Italy	11000	11000	0.0	11000			
Japan		1070	NA			1070	
Netherlands	69064	69064	0.0		20075		48989
Sweden	8875979	9017493	1.6	20000	8661389		336104
Switzerland	2112	47256	2137.5	4235	7255	35766	
UK	16161	957339	5823.8	22184	255	80500	854400
World Total	16540215	19100907	15.5	5854851	8905619	1763115	2577322

Table 2: FSC Certified forest October 2000 by continent and forest ownership

Continent	Total Area (ha)	Comm-unal	Govern- ment	Group	Industrial	Private	Resource Manager
Africa	974137	24850	66739	72458	707163	102927	
Asia	140087		117361		12726	10000	
Australasia/Oceania	195850	8116		1106	40305	146323	
E. Europe	3155800		2988939			166861	
Latin America	1809380	327749		121402	887509	466822	5898
N. America	2544863	40063	1030803	27131	524112	881493	41261
W. Europe	10280813	23580	914347	479251	8408996	442554	12085