



Verein zum Schutz der Bergwelt e.V.

gegründet 1900, gemeinnütziger und nach § 63 BNatSchG anerkannter Naturschutzverein in Bayern

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Mr. Doug Evans
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2nd April 2017

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Priority Natural Habitat Type *9430 in Germany **Forests with erect Pinus mugo agg. (*P. uncinata*) in the Bavarian Alps (Subalpine and mon-** **tane Pinus uncinata forests)**

Dear Mr Evans,

We would like to begin by briefly introducing ourselves. Our NGO, the "Verein zum Schutz der Bergwelt" (VzSB, Nature Organisation for the protection of mountain landscapes) was founded in 1900 as a spin-off from the German Alpine Club (Deutscher Alpenverein). The Verein zum Schutz der Bergwelt, situated in Munich, is the oldest existing nature conservation association in Bavaria and the whole Alpine region. We work on a voluntary basis and finance our annual "Jahrbuch" (year-book) by membership dues and without any government aid.

In 2015, we published a study¹ about Erico-Pinion forests of the Bavarian Alps, including forests which are dominated by erect Pinus mugo agg. (*Pinus uncinata*; in German called „Hakenkiefer“ or „Spirke“). The author Alfred Ringer could scientifically prove the occurrence of Habitat Type *9430² in Germany (page 93 ff.) which is currently missing in the German National List of Habitats. This paper has already been sent to you by Dr. Axel Ssymank from the Bundesamt für Naturschutz (BfN) in Bonn. It is attached as a PDF to this mail as well.

As a result of this study, we showed forests with erect Pinus mugo agg. (*P. uncinata*) to Dr. Ssymank during a field trip near Garmisch-Partenkirchen / Bavaria in June 2016. These forests differ in no way from forests which occur on the other side of the nearby border to Austria. In Austria this forest type

¹ Ringer, A. (2015): Erico-Pinion braucht Natura 2000 - Schneeheide-Kiefernwälder der Nordalpen, ihre Zukunft und aktuellen Probleme. Jahrbuch des Vereins zum Schutz der Bergwelt (München) 80: 63-124.

² INTERPRETATION MANUAL OF EUROPEAN UNION HABITATS EUR 28; April 2013

(<http://eunis.eea.europa.eu/references/2435>), page 138: 9430 Subalpine and montane Pinus uncinata forests (* if on gypsum or limestone); PAL.CLASS.: 42.4 - Mountain pine (*Pinus uncinata*) forests.

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is mapped as Priority Natural Habitat Type *9430, reaching the German border very close in several places.

As *Pinus mugo* agg. (*P. uncinata*) forests on limestone (*9430) are missing on the National List of Habitats in Germany, these sites in the Bavarian Alps are not protected under the Habitats Directive as it should be. They are also excluded from the management plans (Article 6 of the Habitats Directive), which are being worked out from the Bavarian authorities this year.

The *Pinus mugo* agg. (*P. uncinata*) forests of the Bavarian Alps are rare and of small-scale (page 99 f.). Their total size is estimated at about 2.100 ha (few mixed stands inclusive) in Bavaria.

Pinus mugo agg. (*P. uncinata*) forests, as well as Erico-Pinion forests dominated by *Pinus sylvestris* (not covered by Annex I), both have outstanding nature conservation value, due to the occurrence of many rare and endangered species (usually with a species-rich undergrowth, including *Erica herbacea*, and with a rich and specialized fauna) and should, therefore, definitely be protected by Natura 2000. We consider this to be a matter of great urgency.

Our concern is that the Centre Thématique Européen pour la Conservation de la Nature might survey how the *Pinus mugo* agg. (*P. uncinata*) forests on limestone (*9430) of the Bavarian Alps can be included in the next ETC-Checklist for reporting under Article 17 of the Habitats Directive for Germany before finalising all checklists for the next meeting of the Habitats Committee in early May 2017. Time is running short, because management plans are already being defined now in Bavaria.

We have taken the liberty to send you two annuals containing the study of Alfred Ringler by post.

Please let us know about your proceedings.

It would be a great pleasure, to welcome you or other members of your staff in the Bavarian Alps for one or two days in order to inspect and critically examine our *Pinus uncinata* stands (perhaps accompanied by Austrian colleagues, who can best compare our stands to Tyrolean and Vorarlberg ones).

Sincerely yours,



Dr. Sabine Rösler
Second Chairperson

signed

Dr. Klaus Lintzmeyer
Secretary

As PDF-Attachment: Ringler, A. (2015): Erico-Pinion braucht Natura 2000 - Schneeheide-Kiefernwälder der Nordalpen, ihre Zukunft und aktuellen Probleme. Jahrbuch des Vereins zum Schutz der Bergwelt (München) 80: 63-124.