



REPORT

ENG

2019



ClientEarth

GREENPEACE



greenmind



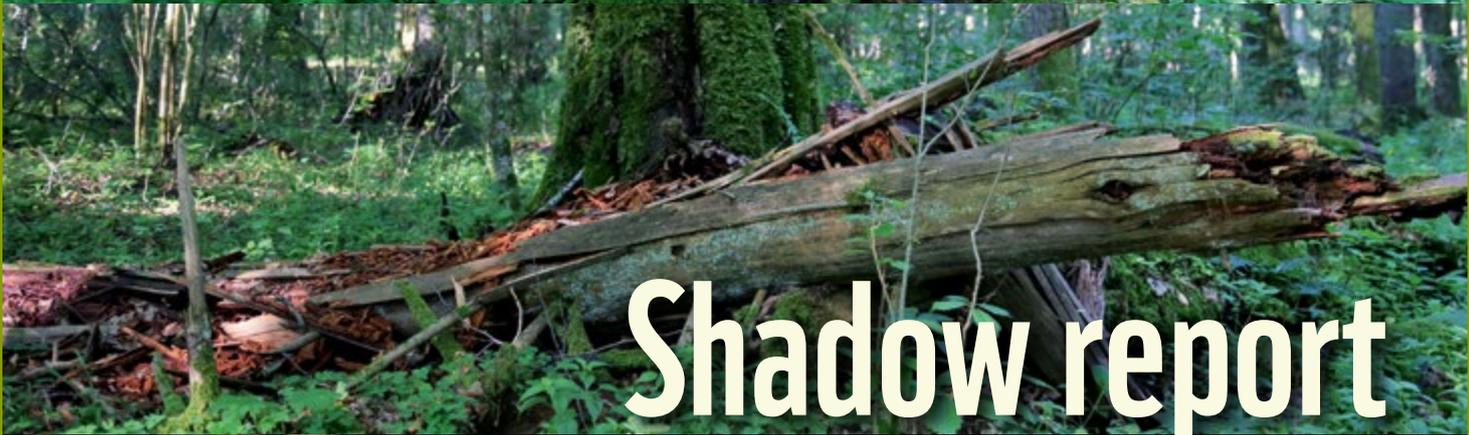
Utop



BirdLife  
PARTNER



FUNDACJA  
DZIKA POLSKA



# Shadow report on the state of conservation of the World Heritage property Bialowieza Forest





**WWF Poland**

Mahatmy Gandhiego 3 street: 02-645 Warsaw, Poland  
www.wwf.pl  
tel. (+48 22) 849 84 69 / 848 73 64



**GREENPEACE**



**FUNDACJA  
DZIKA POLSKA**

**Publication details**

Prepared by NGO Coalition:

ClientEarth, Greenpeace Poland, Greenmind Foundation,  
Polish Society for the Protection of Birds (OTOP) – BirdLife Poland,  
Workshop for All Beings, Wild Poland Foundation, WWF Poland

Any reproduction in full or in part of this publication must mention the title  
and publisher as the copyright owner.

Recommended citation:

*Shadow report on the state of conservation of the World Heritage property  
Bialowieza Forest, 2019*

© 2019 WWF

All rights reserved.

Reproduction of this publication for educational or other non-commercial purposes is  
authorized subject to advance written notification to WWF and appropriate acknowledge-  
ment as stated above. Reproduction of this publication for resale or other commercial  
purposes is prohibited without WWF's prior written permission.

Design by:

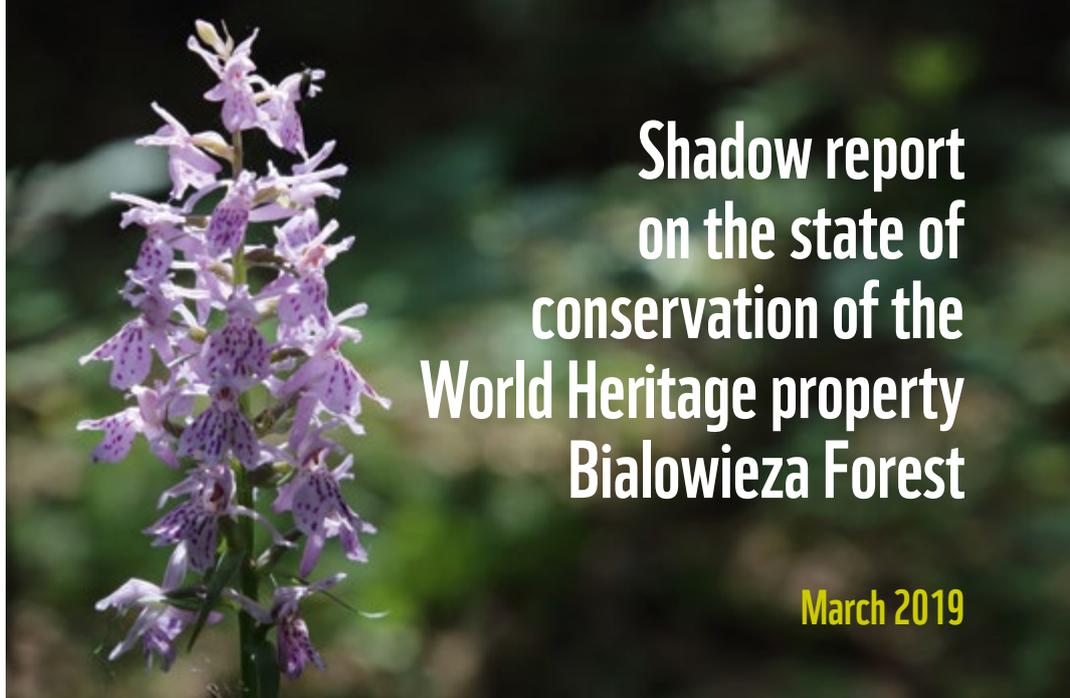
Agencja Wydawnicza EkoPress

Photo credits:

A. Bohdan, A. Kumiszczka, A. Wajrak, M. Klemens, T. Pezold Kneżeвиć, R. Kowalczyk

Cover photo:

© T. Pezold Kneżeвиć



# Shadow report on the state of conservation of the World Heritage property Bialowieza Forest

March 2019

## TABLE OF CONTENTS

---

Preface .....	3
<b>1. Executive summary and key findings .....</b>	<b>6</b>
<b>2. Response to the Decisions of the World Heritage Committee by the State Party .....</b>	<b>9</b>
<b>2.1. Transboundary Steering Committee and Steering Committee     between the National Park and the Forest Administration .....</b>	<b>9</b>
<b>2.2. Integrated management plan for the property .....</b>	<b>10</b>
<b>2.3. Cooperation and engagement of local communities .....</b>	<b>11</b>
<b>2.4. Forest Management Plans .....</b>	<b>14</b>
<b>2.5. Conclusions of the IUCN Advisory Mission .....</b>	<b>15</b>
<b>2.5.1. Legal framework .....</b>	<b>15</b>
<b>2.5.2. Governance .....</b>	<b>16</b>
<b>2.5.3. Socio-economic issues .....</b>	<b>17</b>
<b>2.6. Continuity and integrity of old-growth forest in Bialowieza     Forest and commercial timber extraction .....</b>	<b>18</b>
<b>2.7. World Heritage Centre/IUCN Reactive Monitoring mission .....</b>	<b>33</b>
<b>2.8. The State Parties' report on the state of conservation     of the property .....</b>	<b>36</b>
<b>3. Other current conservation issues which may have an impact on the property's Outstanding Universal Value ...</b>	<b>38</b>
<b>4. New plans/projects .....</b>	<b>40</b>
<b>4.1. Forest management plans .....</b>	<b>40</b>
<b>4.2. Continuation of works on the Narewowska road .....</b>	<b>40</b>
<b>5. Public access to the Shadow state of conservation report ....</b>	<b>42</b>
<b>6. Final remarks .....</b>	<b>43</b>

# PREFACE

---

Following large extension of the Polish – Belarusian Białowieża Forest World Heritage Site (inscribed in 2014) the entire Białowieża Forest (a property of 141,885 ha with a buffer zone of 166,708 ha) is on the World Heritage List.

At the time of submission of the nomination file, the State Parties fully undertook to manage the site in line with the adopted Statement of Outstanding Universal Value, which should be considered as the key reference for future effective protection and management of the property. The nomination file was supported by both States Parties, including their management authorities (administration of National Parks and forest management units). The nomination file clearly identifies management objectives and the measures allowed on the site, its conservation zones and the buffer zone. These were fully consistent with the OUV, and stated that “undisturbed wild nature is a basic principle for management” and that “**timber exploitation for economic purposes is banned**”. As for the buffer zone, the underlying management objective was determined to be: “human interference is allowed in the form of protection measures in order to restore the state of ecosystems and the components of nature to the conditions closest to natural or to preserve natural habitats and habitats of plants, animals and fungi”.

When the decision was made to extend the site (38 COM 8B.12), the World Heritage Committee requested that the two States undertake several measures related to management and governance, and in particular to **expedite the preparation and further official adoption of the integrated management plan** for the property, addressing all key issues concerning the effective conservation and management of this transboundary property. Subsequent decisions of the World Heritage Committee (40 COM 7B.92 and 41 COM 7B.1) a) reiterated requests to expedite preparation of the Transboundary Management Plan; b) requested to maintain the continuity and integrity of protected old-growth forest in Białowieża Forest and measures to ensure that no commercial timber extraction is permitted within the entirety of the Polish part of the property; c) requested the States Parties to submit updated state of conservation report with a **view to considering in case of confirmation of ascertained or potential danger to Outstanding Universal Value, the possible inscription of the property on the List of World Heritage in Danger**.

This report responds to these decisions of the World Heritage Committee and summarizes the most recent trends and developments concerning the state of conservation and factors affecting the property, building upon the information gathered by NGOs and independent scientists. When examining the progress related to implementation of the decisions of the World Heritage Committee as well as assessing the overall state of conservation of the property, this report also takes into consideration findings and recommendations contained in the report from the IUCN Advisory Mission to the World Heritage property “Białowieża Forest” in June 2016. In addition, a commentary on the relevant sections of the recent State of Conservation report by the States Parties is provided.

This report pays particular attention to the Polish part of the property.

The “Shadow SoC report” was prepared by a coalition of environmental NGOs\* to provide the perspective of the public and an assessment of the issues affecting the Białowieża Forest World Heritage Property.

---

\* ClientEarth, Wild Poland Foundation, Greenmind Foundation, Greenpeace Poland, Polish Society for the Protection of Birds (OTOP) – BirdLife Poland, Workshop for All Beings, WWF Poland



# 1. EXECUTIVE SUMMARY

---

**The decisions of the World Heritage Committee and recommendations from the IUCN mission are not being implemented.** Strikingly, only two months after the Committee session the State Party announced the start of increased logging in the Białowieża Forest district.

The data on logging is dramatic and shows that the State Party of Poland is **systematically transforming the best preserved old growth forest in Europe into commercially exploited one.** There is an indication that despite unprecedented timber extraction, commercial logging is going to continue.

The Białowieża Forest WH site, lacking “the management plan or management system” fulfils the prerequisites for **inscription on the List of World Heritage in Danger.** The future of the Białowieża Forest is uncertain and under continued threat.

The root causes of the problem – an **ineffective governance mechanism**, negatively fuelled by the influence of State Forests (SFS), and **lack of political will and lack of technical capacity** of the authorities to deal with Property management and governance, need to be addressed as a matter of priority to make sure that the property remains in the state as prescribed by the requirements of the Convention.

Urgent and determined action is required to reverse the trend of destruction. In the opinion of non-governmental organizations, independent scientists, as well as a large part of concerned Polish and international society, the best way to achieve long-term sustainable management is proper implementation of the requirements of a World Heritage and Natura 2000 site and subsequent **enlargement of the National Park for the entire territory of the Forest.**

---

**IN THE YEAR 2017 ALONE  
COMMERCIAL TIMBER  
EXTRACTION REACHED  
UNPRECEDENTED LEVELS  
OF 190 000 M<sup>3</sup>**

## KEY FINDINGS:

- In the year 2017 alone commercial timber extraction reached **unprecedented levels of 190 000 m<sup>3</sup>.**
- Most logging operations were carried out in the most **valuable old-growth forest** stands **over 100 years old.**
- Logging caused **massive destruction and deterioration** of habitats of saproxylic invertebrates and affected breeding areas of birds particularly important for the Białowieża Forest.
- Timber extraction in 2017 **violated agreed management regimes for an UNESCO WH site**, as it was carried out in the 3rd management zone (“partial protection II”) where any timber extraction is prohibited.
- Approximately 90% of logged and removed trees were **spruce trees that were already dead** with no presence of bark beetle.

---

**MOST LOGGING OPERATIONS  
WERE CARRIED OUT  
IN THE MOST VALUABLE  
OLD-GROWTH FOREST  
STANDS OVER  
100 YEARS OLD**

- Logging operations in 2017 **significantly decreased dead wood storage** in the managed part of the Białowieża Forest.
- The Transboundary Steering Committee and the Steering Committee between the National Park and the Forest Administration in Poland and its coordination group **are not functional**, which results in **lack of involvement of key stakeholders** such as NGOs, scientists and local communities.
- The Polish Ministry of the Environment **does not treat the preparation of the Integrated Management Plan as a priority** and has not undertaken any substantial efforts to expedite the development of this plan.
- Local communities and other stakeholders **were not involved** in any preparatory work related to the Management Plan for the Białowieża Forest Transboundary World Heritage Site.
- The Current management model **does not include stakeholder participation**, which results in a general **lack of understanding of the principles** behind the World Heritage site and its management. To raise awareness and build trust, a **long-term stakeholder engagement programme** needs to be implemented.
- The State Party of Poland did not prepare **any proper evaluation** of potential impact of the amendments to the Forest Management Plan (FMP) on the Białowieża Forest World Heritage site.
- The State Forests holding **does not acknowledge** the reasoning that preparation of any plans that may affect the property and its OUV should be preceded by preparation of an Integrated Management Plan.
- In December 2018, the **State Forests announced that it intended to annex existing forest management plans and increase wood extraction limits, and in consequence allow for commercial timber extraction of a total of 171 000 m<sup>3</sup> in the next three years.**
- **No actions** have been undertaken by the State Party of Poland **to improve quality of governance of the WH property and to involve all stakeholders** in the decision-making process.
- **No progress** has been made by Polish authorities regarding the **vision for sustainable development** for the Białowieża Forest region or **awareness-raising** regarding the value of the Białowieża Forest.
- Despite the fact that the State Forests Holding and Białowieża National Park are formally members of the World Heritage Property Steering Committee, **little or no exchange of information and knowledge** takes place between these two institutions. Effective mechanisms for the involvement of local communities, NGOs, the research community, experts, and other major stakeholders **practically do not exist.**
- **No action** was undertaken to date to address the IUCN recommendation on a clear definition and technical guidelines for “**sanitary cuttings**” and “**safety measures**”.

- **The IUCN recommendation on stakeholder involvement** in the **development of a Forest Fire Prevention and Suppression Plan** was **not addressed** as the draft document was prepared without stakeholder participation.
- The logging **does not serve the needs of local communities** as they are often faced with deficits of timber at the local market.
- **Local tourism-related businesses** suffered in Spring 2017, when large parts of the Forest were **closed for entry** and started to be patrolled by forest guard and the police.
- State Forest practices caused **mobilization of a social movement opposing** their actions. The authorities, especially State Forests and the police, responded with **large scale repressions**.
- The State of Conservation report **by the States Parties** states that Polish State Forests do not carry out commercial logging, whereas the State Forests **admit openly to a plan to continue commercial timber extraction** from the property.
- The State Party of Poland has stated that work is underway to prepare the Integrated Management Plan, and that an expert team has been established to prepare recommendations for its development. This **is contrary to the IUCN recommendation** stating that the plan should be worked out **collaboratively with the local communities and stakeholders**.
- **Ecological connectivity has deteriorated** since the **Narewowska Road**, located in the zones of partial protection I and II, is being rebuild. **No proper environmental impact assessment** has been carried out for the project.
- When **the timber extraction quota** for a 10-year period was reached, the Forest Districts of Browsk and Hajnówka, **requested annex of the Forest Management Plans to allow continued logging**. This is yet another instance in which the State Forests refuse to acknowledge the argument that preparation of any plans that may affect the property and its OUV should be **preceded by preparation of an Integrated Management Plan**.

---

**TIMBER EXTRACTION IN 2017 VIOLATED AGREED MANAGEMENT REGIMES FOR AN UNESCO WH SITE, AS IT WAS CARRIED OUT IN THE 3RD MANAGEMENT ZONE ("PARTIAL PROTECTION II") WHERE ANY TIMBER EXTRACTION IS PROHIBITED**



## 2. RESPONSE TO THE DECISIONS OF THE WORLD HERITAGE COMMITTEE BY THE STATE PARTY

---

This chapter analyses progress made in relation to relevant decisions of the World Heritage Committee (38 COM 8B.12; 40 COM 7B.92 and 41 COM 7B.1) as well as corresponding recommendations resulting from the IUCN Advisory mission.

### 2.1. Transboundary Steering Committee and the Steering Committee between the National Park and the Forest Administration

*The World Heritage Committee requested to establish as a matter of urgency the Steering Committee between the National Park and the Forest Administration to ensure the integrated planning and management of the Polish side of the property, and to provide adequate financial resources for the effective functioning of this Steering Committee. [38 COM 8B.12]*

*The World Heritage Committee requested to establish as a matter of urgency the Transboundary Steering Committee that will coordinate, promote and facilitate the integrated management of the property. Also requests the States Parties of Poland and Belarus to provide adequate human and financial resources to ensure the effective functioning of the Transboundary Steering Committee. [38 COM 8B.12]*

*Noted that a transboundary Steering Committee for the property has been established which will be tasked with the preparation of a transboundary Management Plan for the property, and reiterated its request to the States Parties of Belarus and Poland to prepare such a plan as a matter of priority in order to ensure a coordinated approach to the management of the property and to guarantee that no actions can be allowed within the entire property that could negatively impact on its OUV. [40 COM 7B.92]*

In 2014, all institutions managing the property in Poland and Belarus signed an agreement establishing a Steering Committee for the World Heritage Site Bialowieza Forest. The Agreement, together with the Rules of the Steering Committee, provided a good basis for future coordinated management of the transboundary property. Within the framework of the SC, the State Party of Poland developed an agreement establishing a working group to coordinate the cooperation of the bodies managing the Polish part of the property. **Although effective functioning of this Steering Committee and its coordination group is essential to ensure a coordinated approach to integrated management, these bodies remained “on paper” and are not functional.** Recommended regular meetings are not taking place, and very limited collaboration on an *ad hoc* basis only takes place

---

LOGGING CAUSED  
MASSIVE DESTRUCTION  
AND DETERIORATION OF  
HABITATS OF SAPROXYLIC  
INVERTEBRATES AND  
AFFECTED BREEDING AREAS  
OF BIRDS PARTICULARLY  
IMPORTANT FOR THE  
BIAŁOWIEŻA FOREST

when particular needs arise (such as organization of recent advisory and reactive monitoring missions or preparation of SoC reports). Therefore, its input in transboundary coordination and management as an essential and long-term requirement is not being provided.

**The above-mentioned dysfunctionality of these bodies also results in lack of involvement of key stakeholders such as NGOs, scientists and local communities.**

## 2.2. Integrated management plan for the property

*The World Heritage Committee requested to expedite the preparation and further official adoption of the integrated management plan for the property addressing all key issues concerning the effective conservation and management of this transboundary property, particularly those concerning forest and wetlands management, and the need to increase functional ecological connectivity in the property, and to reduce the existing large network of roads and fire prevention corridors. [38 COM 8B.12]*

*Also requests the States Parties of Poland and Belarus to ensure that this integrated management plan is adequately funded to ensure its effective implementation. [38 COM 8B.12]*

*While also noting* the conclusion of the States Parties that the preparation of the Transboundary Management Plan for the property will require several years, *also reiterated its request* to the States Parties to prepare such a Plan as a matter of priority in order to ensure a coordinated approach to the management of the property and to guarantee that no actions can be allowed within the entire property that could negatively impact on its OUV. [41 COM 7B.1]

As correctly pointed out *inter alia* in the 2016 IUCN report, “the lack of a detailed and operational management plan for the WH property is a major source of misunderstanding and conflicts between foresters and environmentalists”. Also, at the time when the extension and renomination of the property was approved by the World Heritage Committee in 2014, one of the requests made by the Committee was that the States Parties “expedite the preparation and further official adoption of the integrated management plan for the property addressing all key issues concerning the effective conservation and management of this transboundary property, particularly those concerning forest and wetlands management, and the need to increase functional ecological connectivity in the property, and to reduce the existing large network of roads and fire prevention corridors”.

**The Polish Ministry of the Environment clearly does not treat the preparation of the Integrated Management Plan as a priority.** Back in 2016, it took half a year to prepare the “Draft assumptions of the essential principles for the Integrated Management Plan for the Białowieża Forest Transboundary World Heritage Site”, a five-page document containing a draft and very vague provisions. Moreover, those provisions do not guarantee that “no actions will be allowed within the entire property that could negatively impact on its OUV”.

---

APPROXIMATELY 90%  
OF LOGGED AND REMOVED  
TREES WERE SPRUCE TREES  
THAT WERE ALREADY DEAD  
WITH NO PRESENCE OF  
BARK BEETLE

---

**LOGGING OPERATIONS  
IN 2017 SIGNIFICANTLY  
DECREASED DEAD WOOD  
STORAGE IN THE MANAGED  
PART OF THE BIAŁOWIEŻA  
FOREST**

The text of the document raises concerns as it does not comply with UNESCO documentation for the site in question, and in particular with the Statement of Outstanding Universal Value, and this is a **complete contravention of Art. 51 of Operational Guidelines** for the Implementation of the World Heritage Convention.

On 25 May 2018, the Polish Minister of Environment established an Expert Team for the Białowieża Forest. The task of the team was to formulate “*recommendations for an action plan for the Białowieża Forest aimed at protecting natural resources of the area, taking into consideration national legislation on nature conservation and forestry as well as relevant international regulations*”. The selection process for the team members was far from being transparent and inclusive, and as a consequence the team comprises members who supported intensive timber extraction in previous years. The team does not comprise any civil society representatives or independent scientists. According to the information available, the team met once and did not produce any substantial findings.

It shall be noted that according to art. 180 of the Operational Guidelines the **potential danger for the property** is a threat described as “**the management plan or management system is lacking or inadequate, or not fully implemented.**” Such situation is currently being faced by the Property.

## **2.3. Cooperation and engagement of local communities**

*The World Heritage Committee requested to maintain and enhance the level of cooperation and engagement of local communities that have been achieved during the preparation of this nomination as to ensure their contribution to the effective management of the property. [38 COM 8B.12]*

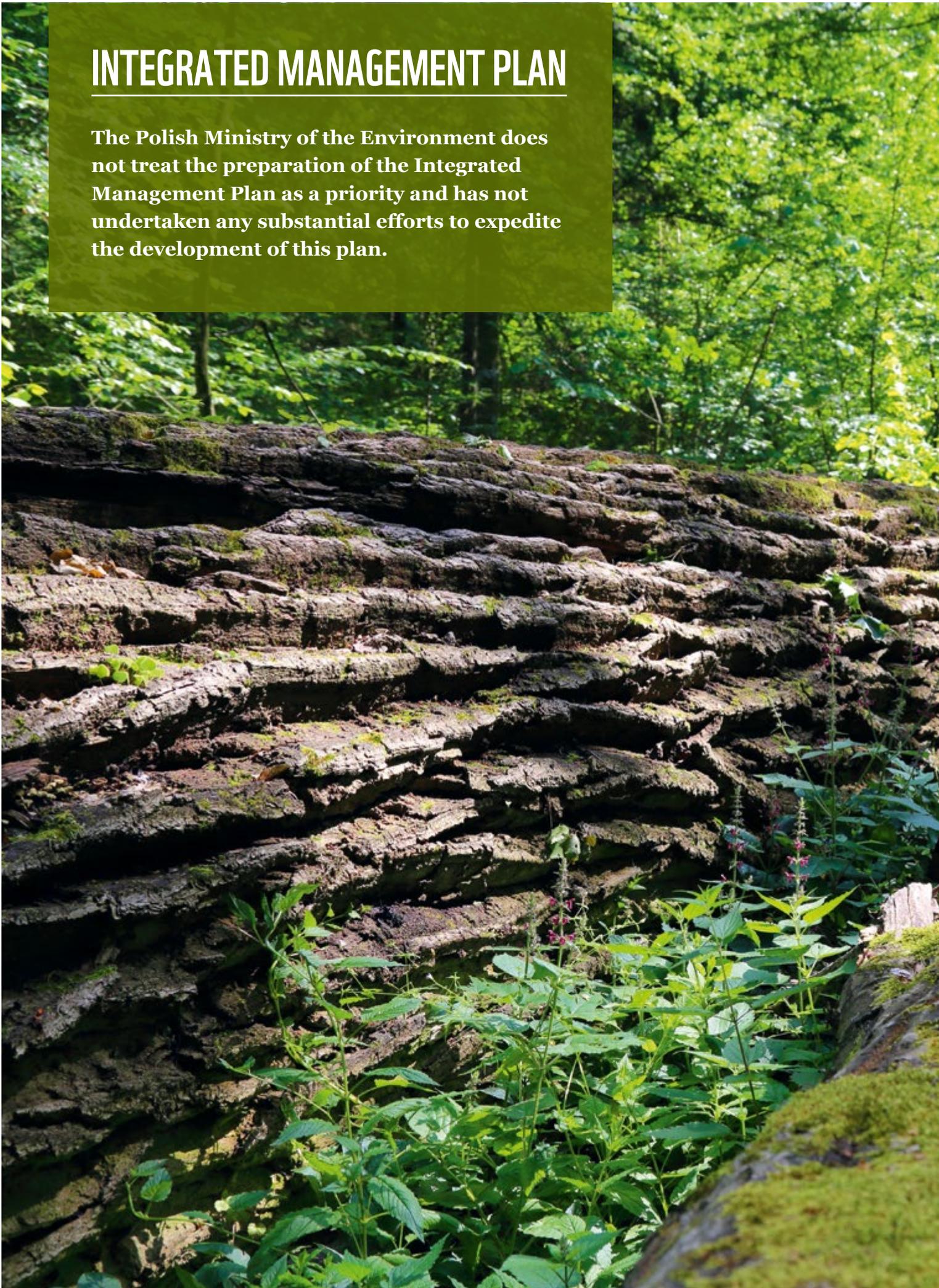
It is essential that management of a World Heritage site, like management of a protected area, involve all stakeholders at every stage and in particular when setting up a management system for the property. This is not the case for the Białowieża Forest, which leads to significant problems in site management. **The conventional, top-down model is still being applied, and this means that there is no understanding of the values, goals, purposes, rules, costs and benefits of World Heritage site management.** As a consequence, there is no support for the WH site, and mistrust and literally no working relations between site managers, local communities and other stakeholders.

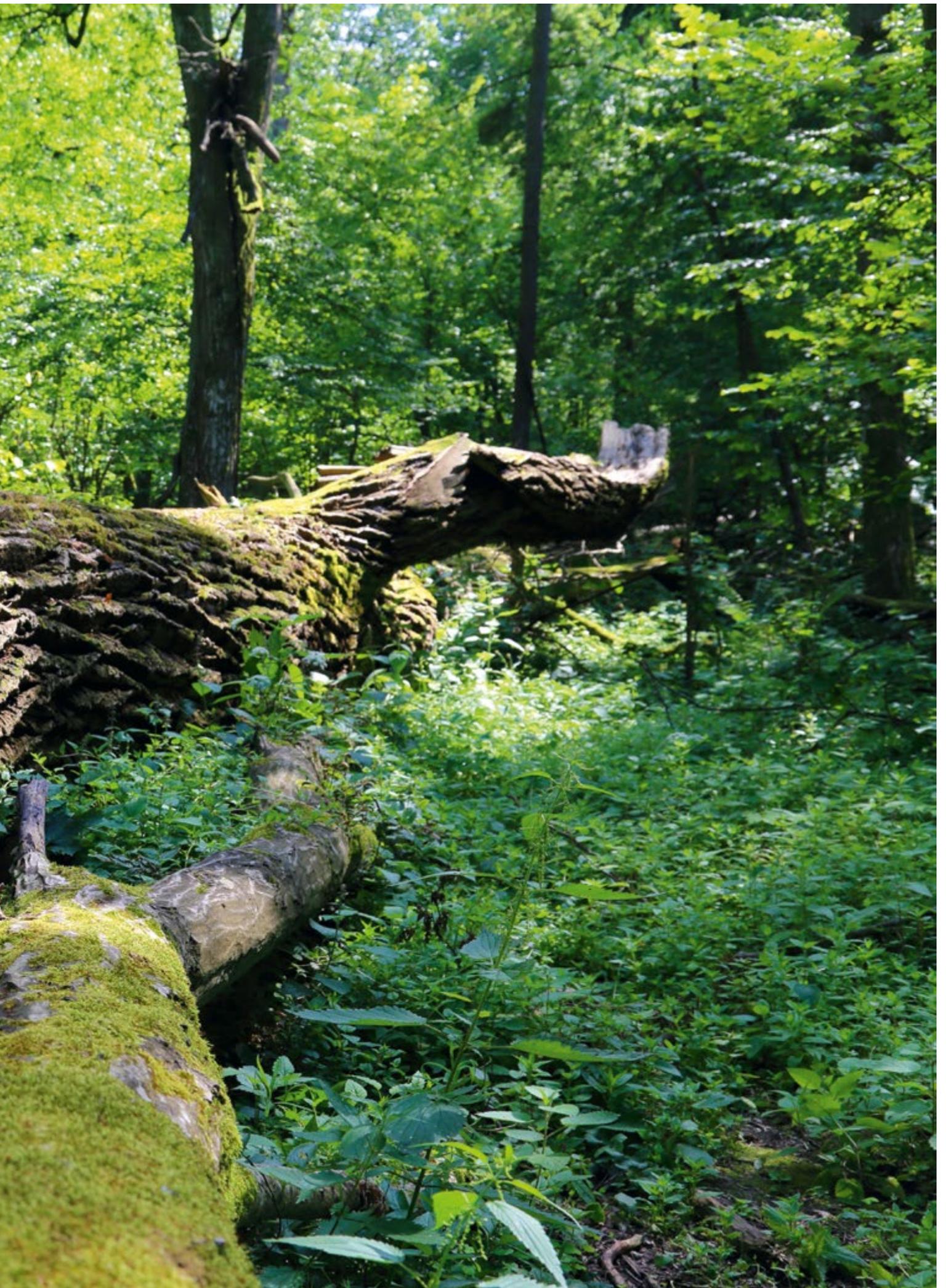
**Local communities and other stakeholders (NGOs, scientists) were not involved or properly consulted on any preparatory work conducted so far related to the Management Plan for the Białowieża Forest Transboundary World Heritage Site.** Instead of cooperation and transparency, increasing exclusion of scientists and environmental NGOs was observed.

In May 2018, the Polish Ministry of the Environment established a team that was intended to deal *inter alia* with issues related to the implementation of the Committee decisions. These processes lacked transparency

# INTEGRATED MANAGEMENT PLAN

The Polish Ministry of the Environment does not treat the preparation of the Integrated Management Plan as a priority and has not undertaken any substantial efforts to expedite the development of this plan.





and proper communication and stakeholder involvement, and as a consequence no substantial results were produced.

The level of cooperation and engagement achieved during the preparation of the nomination has deteriorated significantly, which resulted in some cases in creation of hostile relations. **A substantial, properly thought through long-term stakeholder engagement programme would have to be implemented in order to rebuild those relationships.**

## 2.4. Forest Management Plans

*The World Heritage Committee requested* the State Party of Poland to submit to the Committee an evaluation of potential impacts on the amendments to the Forest Management Plan on the OUV of the property, taking into account all forms of conservation applicable to the site and the positions and options of local communities and stakeholders, in the context of the sustainable development of the Białowieża Forest region; [40 COM 7B.92]

*The World Heritage Committee noted* the information provided by the States Parties regarding the activities termed sanitary cuttings undertaken in the Polish part of the property and the conclusions of the Strategic Environmental Assessment (SEA) of the Amendment to the Forest Management Plan for the Białowieża Forest District but, *noting* that the separate evaluation of potential impacts on the Outstanding Universal Value (OUV) of the property mainly summarized the conclusions of the SEA, *considered* that the focus of the SEA on assessing potential impacts to the Natura 2000 site “Puszcza Białowieska”, does not represent an adequate assessment of impacts on the OUV of the property. [41 COM 7B.1]

**The State Party of Poland did not prepare any proper evaluation of potential impacts of the amendments to the Forest Management Plan (FMP) on the Białowieża Forest World Heritage site.** The three-page document “An evaluation of the potential impacts of the Amendment to the Forest Management Plan for the Białowieża Forest District on the Outstanding Universal Value of the property”, based on the Strategic Environmental Assessment (SEA), does not meet requirements of proper evaluation of potential impacts on the OUV. This assessment has been confirmed by the IUCN Advisory Mission, which concluded that “the Strategic Environmental Assessment of the amendments to the Białowieża Forest Management Plan does not make reference to the possible effects of this modification on the OUV of the WH property, or its integrity; it does not address this matter at all”.

In the spirit of the Convention, decisions made by the Committee, recommendations made by the IUCN Advisory mission, preparation of any plans that may affect the property and its OUV should be preceded by preparation of an Integrated Management Plan and should take into consideration findings and recommendations of the upcoming report from the WHC/IUCN Reactive monitoring mission. **This reasoning is not acknowledged by the State Forests holding. In December 2018, the State Forest announced its intention to annex**

---

**THE TRANSBOUNDARY STEERING COMMITTEE AND THE STEERING COMMITTEE BETWEEN THE NATIONAL PARK AND THE FOREST ADMINISTRATION IN POLAND AND ITS COORDINATION GROUP ARE NOT FUNCTIONAL, WHICH RESULTS IN LACK OF INVOLVEMENT OF KEY STAKEHOLDERS SUCH AS NGOS, SCIENTISTS AND LOCAL COMMUNITIES**

existing forest management plans in the Białowieża Forest, increase wood extraction limits, and thus allow for commercial timber extraction of a total of 171 000 m<sup>3</sup> in the next three years.

## 2.5. Conclusions of the IUCN Advisory Mission

LOCAL COMMUNITIES AND OTHER STAKEHOLDERS WERE NOT INVOLVED IN ANY PREPARATORY WORK RELATED TO THE MANAGEMENT PLAN FOR THE BIAŁOWIEŻA FOREST TRANSBOUNDARY WORLD HERITAGE SITE

The World Heritage Committee *taken note* of the conclusions of the IUCN Advisory Mission and *underlined* the need for the State Party to consider the conclusions with all relevant stakeholders. [40 COM 7B.92]

The section below provides an assessment of **progress in the implementation of key IUCN** recommendations made by the 2016 mission.

### 2.5.1 Legal framework

**IUCN Recommendation on definition of the concepts of “sanitary cuttings” and “safety measures”:** *clear technical guidelines should be established for “sanitary” cuttings and “safety measures”, detailing when, where and how those measures can be decided and then implemented; those guidelines should be established by a working group involving all types of stakeholders and be fully compatible with the World Heritage requirements.*

**No action has been taken to date to address this recommendation.**

**IUCN Recommendation on forest fire protection/prevention and visitor safety:** *The mission experts recommend the development and implementation of a comprehensive detailed Forest Fire Prevention and Suppression Plan for the WH property. This plan should be developed by a working group involving all categories of stakeholders and it should regulate the access to the most sensitive areas by cars and visitors.*

The States Parties’ SoC claims that “A comprehensive plan for the prevention and extinguishing of forest fires on the World Heritage Site” was developed and that a wide range of stakeholders need to be consulted on this plan. **Such an approach is clearly contrary to the IUCN recommendation on stakeholder involvement in development of this plan.** No working group involving all categories of stakeholders was created. This may result in further escalation of the dispute regarding forest fire prevention and disapproval of the plan.

The official reason given for the increase in logging quotas is sometimes officially justified by the fire safety reasons, which is misleading as the fire hazard level in the three forest districts invariably stays at the same low (safe) level.

There is also scientific evidence including *inter alia* conclusions of the research by the Forest Research Institute (Stereńczak et al. 2015) stating that:

- The Białowieża Forest has the lowest degree (third category), on the scale of fire risk in Polish forests and the average thickness of dead wood in this forest is several times higher than in commercially managed forests.

- Due to their lower susceptibility to inflammation, fallen logs present a lower fire risk than dry branches.

Contrary to the claims made by the Ministry of the Environment, the increase of fire risk is in fact a result of:

- a) logging of trees and accompanying removal of logs (which may result in flammable grasses appearing locally),
- b) collecting branches in one place as a part of cleaning works,
- c) the igniting of bonfires by forest workers.



**Fig. 1:** Bonfires lit by foresters is common practice in the Białowieża Forest

Except for the plan mentioned above, which was developed without involvement of stakeholders and which is not publicly available, there was no further progress made by Polish authorities regarding implementation of the IUCN Recommendation on forest fire protection/prevention and visitor safety.

### 2.5.2. Governance

As correctly assessed by IUCN experts in 2016 and pointed out in the report, communication between the key stakeholders has been poor since the extension of the property in 2014. **The situation in this regard has deteriorated even more since then.**

The State Forests has been forging the ties with the communities, in particular with their elected leaders. This mechanism is being further fuelled *inter alia* by the fact that they allocate substantial amounts of funds for investments in infrastructure and providing support to local authorities. Building the Narewowska road is one example of financial interdependencies of this kind.

The administration of the Białowieża National Park plays a minor role in the WH-related debates and concentrates its activities exclusively on the territory of the park. This approach may further catalyse the already critical attitude of local communities towards the park. **Moreover, it seems that little or no exchange of information and knowledge takes place between the State Forests and the National**

---

**THE CURRENT MANAGEMENT MODEL DOES NOT INCLUDE STAKEHOLDER PARTICIPATION, WHICH RESULTS IN A GENERAL LACK OF UNDERSTANDING OF THE PRINCIPLES BEHIND THE WORLD HERITAGE SITE AND ITS MANAGEMENT. TO RAISE AWARENESS AND BUILD TRUST, A LONG-TERM STAKEHOLDER ENGAGEMENT PROGRAMME NEEDS TO BE IMPLEMENTED**

**Park, despite the fact that both institutions are formally members of the WH property Steering Committee** (see also section 2.1). Lack of effective collaboration is obviously visible even from reading the latest SoC reports by the States Parties. It is rather a compilation of separate, unintegrated parts (coming from different institutions depending on their competences) rather than a comprehensive report that looks at the site as one property.

As properly concluded by the IUCN mission report, “the lack of communication across the disciplinary and institutional divides has exacerbated the conflicts and created hostility among the parties; this was perpetuated despite the fact that the opposing camps are not capable of addressing a number of issues on their own.”

**Effective mechanisms for the involvement of local communities, NGOs, research community, experts/specialists, and other major stakeholders practically do not exist.**

The IUCN Mission report suggested several detailed recommendations to address the above-mentioned issues. The recommendations highlight the need: 1) to significantly improve quality of governance of the WH property by establishing and maintaining governance institutions that enjoy broad acceptance and appreciation; 2) to ensure that all stakeholders receive appropriate and sufficient information, can be represented, and can have a say in advising and/or making decisions at all levels, national and local.

Although the IUCN report underlines that **current tensions and difficulties will not be resolved without significant efforts of the parties to a community and shared approach to the WH property management**, no actions have been undertaken by the State Party to implement the recommendations.

### **2.5.3. Socio-economic issues**

The 2016 IUCN mission report identified several socio-economic issues and correctly underlined that little attention is being paid to the importance of the tourism sector in the WH property. Most of the local officials stated that the village of Bialowieza reaps most of the benefits.

The report subsequently recommended 1) developing a vision for sustainable development for the Bialowieza Forest region which would cover diverse socioeconomic issues and consider all benefits provided by the forest; 2) developing a strong awareness program for the local communities and the public, on the functions and all of the values of the Bialowieza Forest.

To date, **no actions have been undertaken by the State Party** to implement the above-mentioned recommendations. There are at least three reasons for this:

- 1) the State Forests does not see foresters playing a significant role in promoting and managing visitors to the Bialowieza Forest;
- 2) the existing governance dysfunction limits the ability of local stakeholders to reach an agreement and to address the issues in question;
- 3) there is a lack of political will as well as technical capacities both at national and local level to address root causes of the issue and implement appropriate solutions.

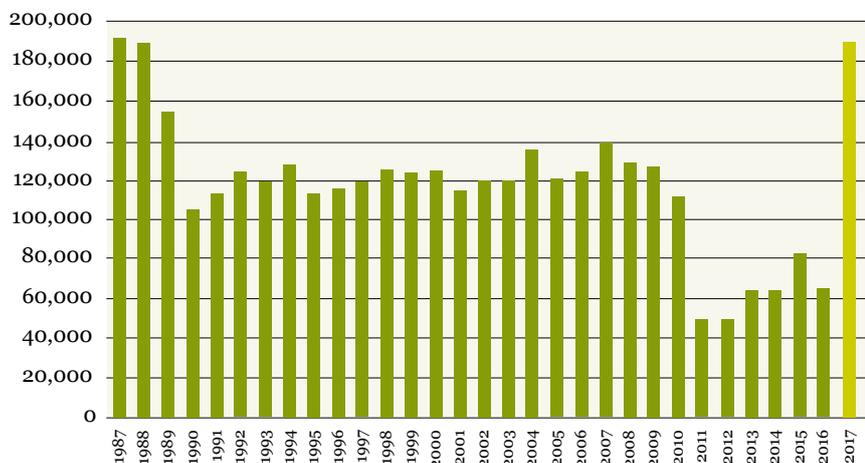
As a consequence, no progress has been made by Polish authorities regarding implementation of this Recommendation.

## 2.6. Continuity and integrity of old-growth forest in the Białowieża Forest and commercial timber extraction

The World Heritage Committee *requested* the State Party of Poland to take any necessary measures to maintain the continuity and integrity of protected old-growth forest in Białowieża Forest and to ensure that no commercial timber extraction is permitted within the entirety of the Polish part of the property and *considered* that such commercial timber extraction would represent a potential danger to the property in accordance with Paragraph 180 of the Operational Guidelines; [40 COM 7B.92]

*Reiterated its position* that commercial timber extraction within the entire property would represent a potential danger to the property in accordance with Paragraph 180 of the Operational Guidelines, and *noted with utmost concern* the infringement decision issued by the European Commission in relation to Białowieża Forest in Poland, which noted that increased logging is likely to adversely affect the conservation of the site's habitats and species as well as cause irreparable biodiversity loss, including through removal of 100-year and older trees, and that these measures would, according to the evidence available, exceed those that would be necessary for ensuring the safe use of the forest; [41 COM 7B.1]

The World Heritage Committee *reiterated its request* to the State Party of Poland to maintain the continuity and integrity of protected old-growth forest in Białowieża Forest and *strongly urged* it to immediately halt all logging and wood extraction in old-growth forests, and to clarify third party reports about logging targeting species other than those affected by bark beetle, which cannot be justified as so-called sanitary cuttings. [41 COM 7B.1]

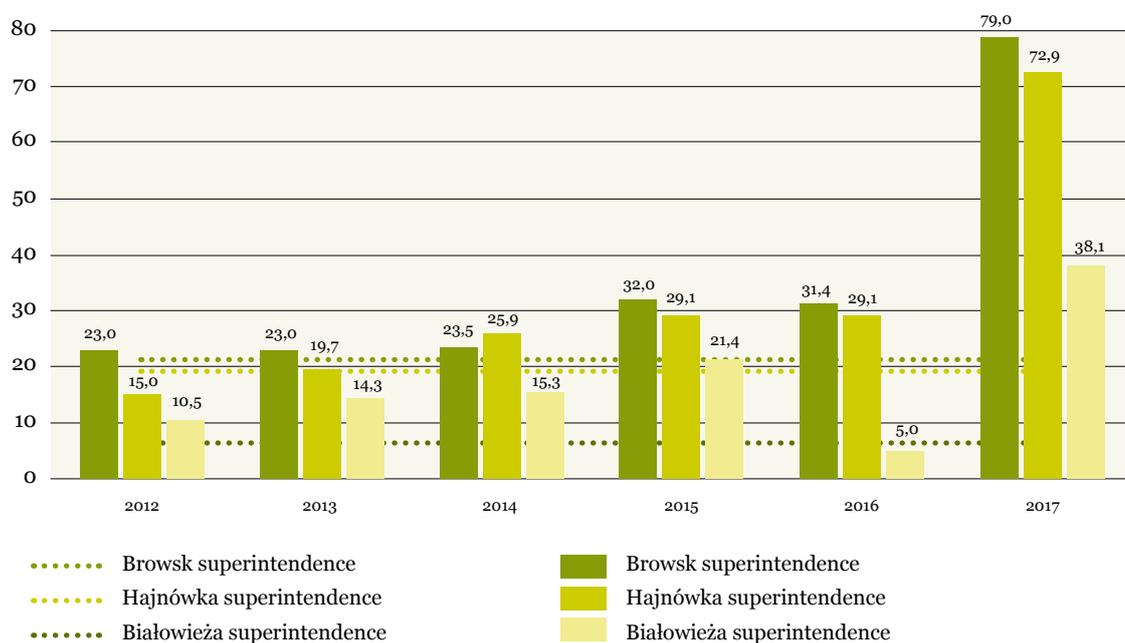


**Fig. 2:** Commercial timber extraction in the Białowieża Forest 1987-2017 [m³]

Despite recommendations made by the 2016 IUCN Advisory mission and concerns expressed by the European Commission, the World Heritage Committee, independent scientists and nature conservation NGOs, **in the year 2017 alone commercial timber extraction reached unprecedented levels of 190 000 m<sup>3</sup>**. Such intensive logging has not taken place for 30 years. According to our analysis, the estimated area of clear cuts in 2017 covered almost 300 hectares.

**In 2017, most logging operations were carried out in the most valuable old-growth forest stands of over 100 years old.** Large-scale logging using heavy machinery, besides irreparable influence on biodiversity values, caused destruction of soil cover and disruption of ecological processes.

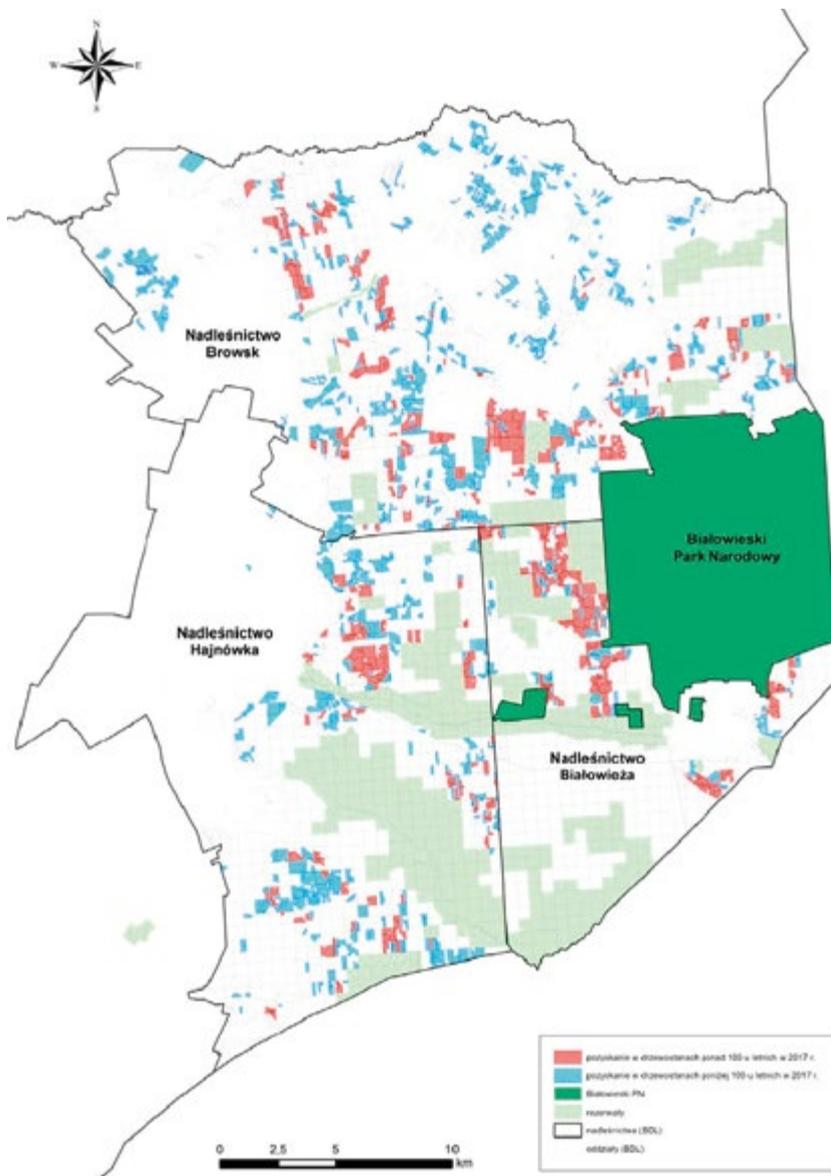
**Fig. 3:** Timber extraction in the Białowieża Forest in the years 2012-2017 by forest districts [thousands cubic meters]



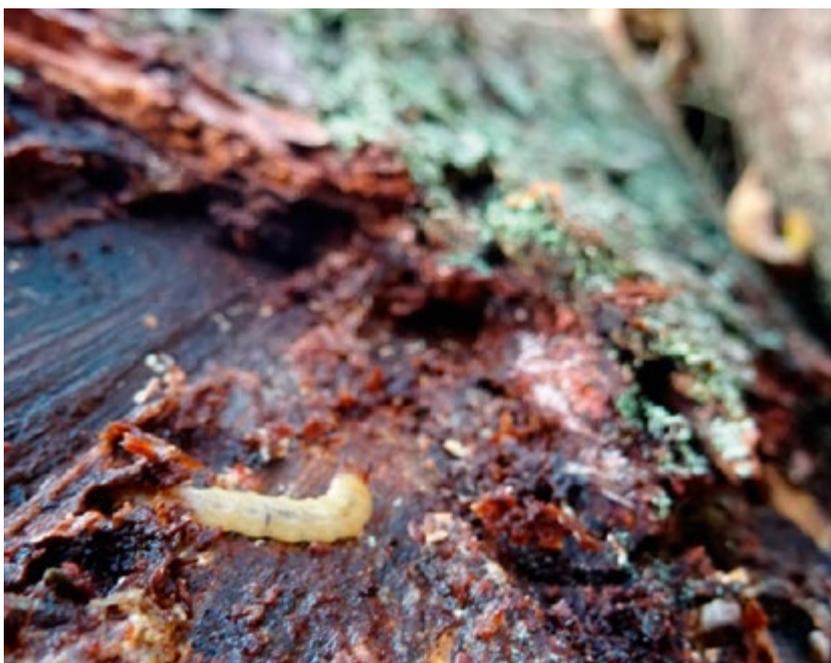
**2017 logging included large-scale interventions in oak-hornbeam forests (*Tilio Carpinetum*).** Over 100 000 m<sup>3</sup> of timber was extracted, leading to habitat deterioration due to decreasing dead wood richness, species composition of forest cover and altering age structure of the forest stands.

**2017 logging caused massive destruction and deterioration of habitats of saproxylic invertebrates as a result of removal of large quantities of dead spruce stands previously inhabited by bark beetle.** It is estimated that over 90% of timber<sup>1</sup> removed from the Białowieża forest has characteristics of habitats preferred by saproxylic invertebrates. The removed spruces had been dead for more than one year. Trees were in the second stage of decay – already left by bark beetle but settled by protected, red listed saproxylic beetles: *Boros schneideri*, *Cucujus cinnaberinus*, *Cucujus haematodes*.

<sup>1</sup> Source: “Białowieża Forest – devastation report 2017”



**Fig. 4:** Forest sections that were affected by timber extraction in 2017 in old-growth forest stands of over 100 years old (red) and below 100 years (blue). The National Park is marked in dark green and nature reserves in light green



**Fig. 5:** *Boros schneideri* larva on dead spruce log prepared for removal from the forest

Those species were removed from the forest with timber. In the next stages of decay, dead spruces in the Białowieża Forest are used by other red-listed species, protected by the Habitat Directive such as *Rhysodes sulcatus* and *Phryganophilus ruficollis*.

**Fig. 6:** Examples of documented habitats of *Cucujus cinnaberinus* and *Boros schneideri* destroyed by logging during 2017

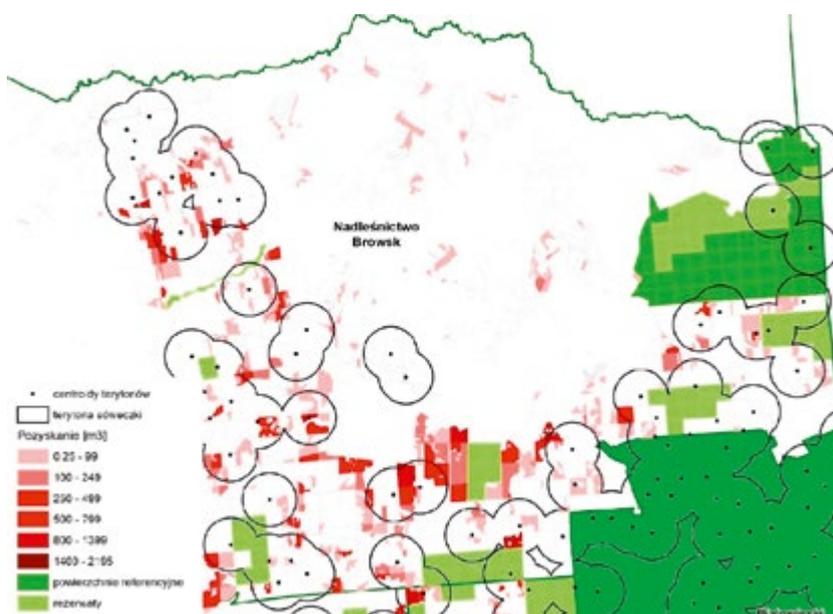


**Intensive logging conducted in 2017 affected<sup>2</sup> breeding areas of birds particularly important for the Białowieża Forest** such as the Eurasian pygmy owl (*Glaucidium passerinum*) – 52% of breeding areas affected, Boreal owl (*Aegolius funereus*) – 43% of breeding areas affected, and the three-toed woodpecker (*Picoides tridactylus*) and the white-backed woodpecker (*Dendrocopos leucotos*). This rare species depend on habitats provided by natural old-growth forest and in particular dead wood, including spruce stands.

<sup>2</sup> Source: “Białowieża Forest – devastation report 2017”



**Fig. 7:** Satellite image showing cleared areas that occurred in 2017 in breeding sites of the white-backed woodpecker (*Dendrocopos leucotos*) [red] and three-toed woodpecker (*Picoides tridactylus*) [green]



**Fig. 8:** Intensity of timber extraction in the territories of the Eurasian pygmy owl in the Browsk forest district in 2017 [m³]

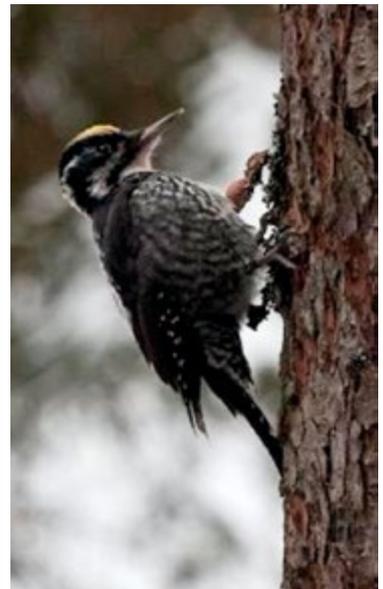


**Fig. 9:** Habitat of the Boreal owl destroyed as a result of 2017 logging – forest plot 519D



**Fig. 10:** Breeding territory of the Boreal owl in which timber extraction in 2017 reached 195 m<sup>3</sup>/ha

**Fig. 11:** Habitat of the three-toed woodpecker destroyed as a result of 2017 logging – forest plot 338D



During 2017, over 90% of biomass extracted, removed and eventually sold on the market by SFS, consisted of dead spruce trees. Around 50% of them were over 100 years old. Most of the spruce trees died as a result of bark beetle infestation. The initial reason given for tree log removal was a need to deal with a bark beetle outbreak. When the so-called “sanitary cuttings” were banned by the Court of Justice of the European Union, the practice of dead tree removal started to be justified by “public safety” reasons. Despite profound biodiversity loss, these practices continued.



**Fig. 12:** The three-toed woodpecker and pygmy owl nesting in old, dead spruce trees



**Fig. 13:** Marked in red, over 100-year old spruce logs removed from the Forest

**Neither the Plan of Protective Tasks for the Natura 2000 nor the Forest Management Plans allow large-scale logging.** According to the same documents, old-growth tree stands of over 100 years old shall be excluded from forest management.

Only limited and well justified forest management practices are allowed in order to conduct so-called “rebuilding of forest stands” to allow for increased naturalness of selected forest plots degraded by commercial forest management practices in the past. Despite these regulations, some of the logging activities in 2017 were carried out in stands over 100 years old and were characterized by large-scale interventions.

**Fig. 14:** Satellite image showing plots affected by large-scale clear cuts



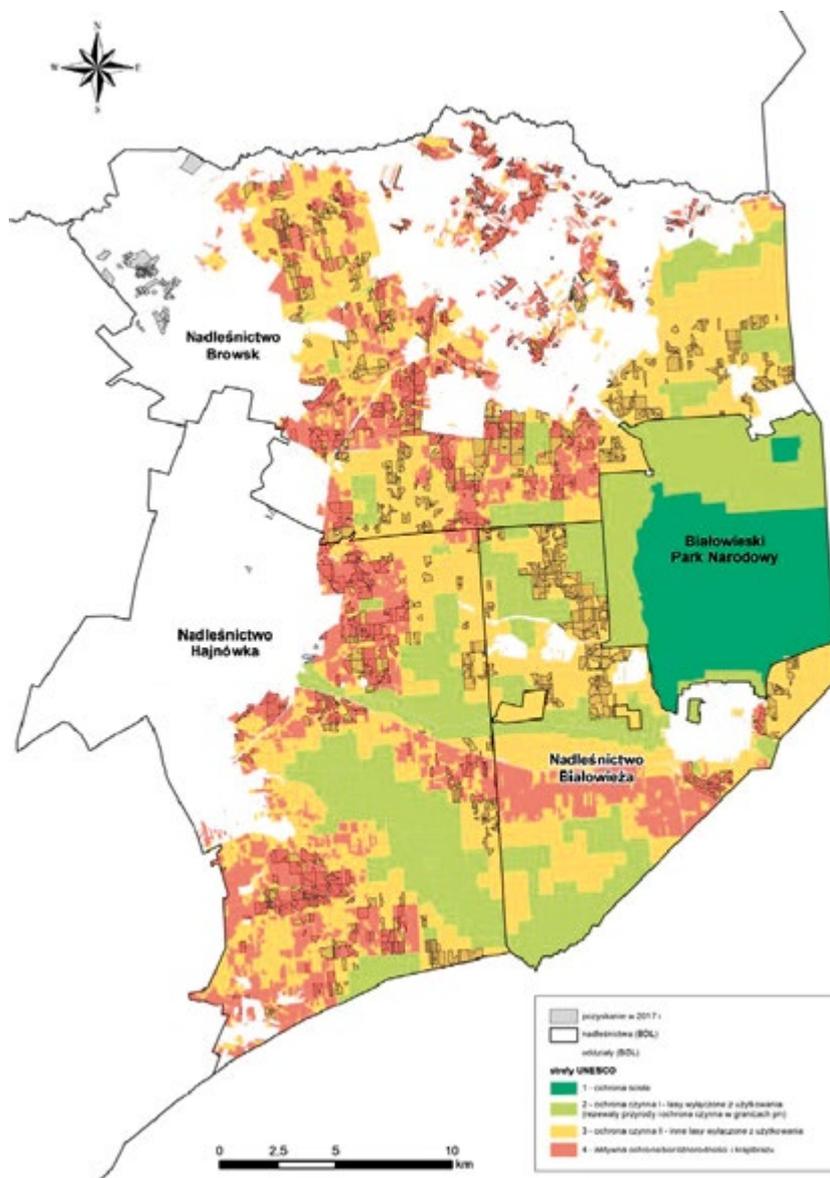
**Timber extraction in 2017 violated agreed management regimes for the UNESCO WH site.** The WH Property is divided into 4 management zones, of which zones I, II, and III shall be excluded from any forest management activities (including timber extraction and so-called “sanitary cuttings” that are being justified by bark beetle infestations). Despite these regulations, **intensive timber extraction was carried out in the 3rd management zone (“partial protection II”)**, and this had an adverse effect on old-growth forest stands. Some of the clear cuts were more than 500m in length.

Logging operations affected also habitats of other red-listed species – mosses and lichens classified as relicts of primeval forests, sensitive to the “edge effect” caused by clear cuts.

The part of the Property under the jurisdiction of the State Forests covers approximately 520 km<sup>2</sup>, out of which 290 km<sup>2</sup> (almost 56%) is in 3rd management zone. Allowing intensive timber extraction in these areas shall be considered a **breach of the World Heritage Convention.**

**Fig. 15:** *Dicranum viride* (listed in habitat directive), *Thelotrema lepadinum*, *Lobaria pulmonaria* – old growth forest indicators, sensitive to anthropogenic disturbances





**Fig. 16:** Forest sections affected by timber extraction in the III and IV UNESCO management zones in 2017 (zones: I – dark green; II – light green; III – yellow; IV – red)

Data made available by forest districts show that timber extracted in 2017 in 3rd management zone made up 53% of annual extraction in the entire Białowieża Forest. Active forest management with timber extraction continued despite the Court of Justice of the EU decision of 2017 requesting that such practices be discontinued.

Although the official reason given for intensive logging was a need to deal with bark beetle outbreak, **approximately 90% of logged and removed trees were dead spruce trees with no bark beetle presence.**

The assessment of the damage caused by logging is available in recent scientific articles<sup>3</sup> based on research conducted between July 2015 and June 2018: “The total area of detected clear cuts amounted to at least **675 ha, including 229 ha of old growth stands.** Assuming a buffer of 100m from the edge of the cleared forest patches, the **cumulative**

<sup>3</sup> Mikusiński, G., Bubnicki, J.W., Churski, M., Czeszczewik, D., Walankiewicz, W., Kuijper, D.P.J. Is the impact of loggings in the last primeval lowland forest in Europe underestimated? The conservation issues of Białowieża Forest. *Biological Conservation* 227: 266-274. <https://doi.org/10.1016/j.biocon.2018.09.001>

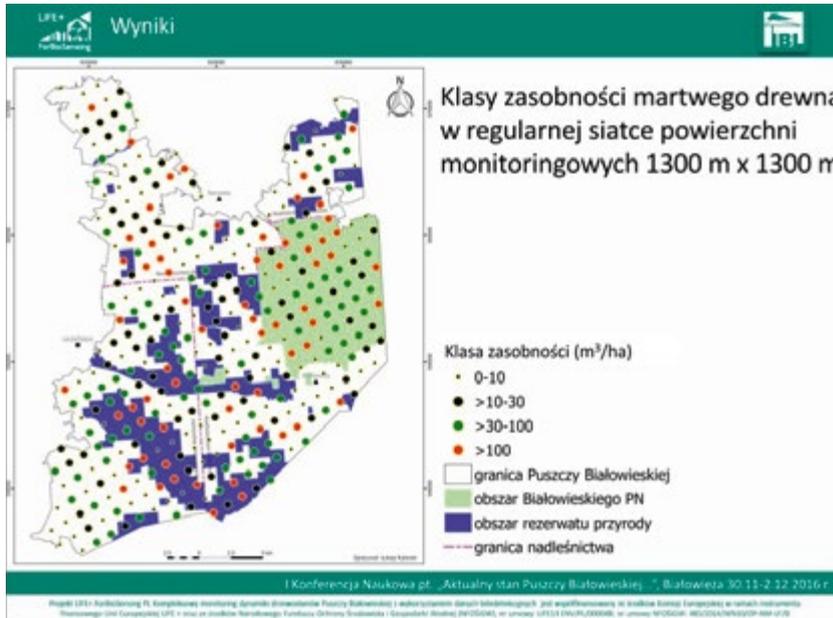
**Fig. 17:** Approximately 90% of spruce trees had been dead for a year and did not have any bark beetle presence before being logged



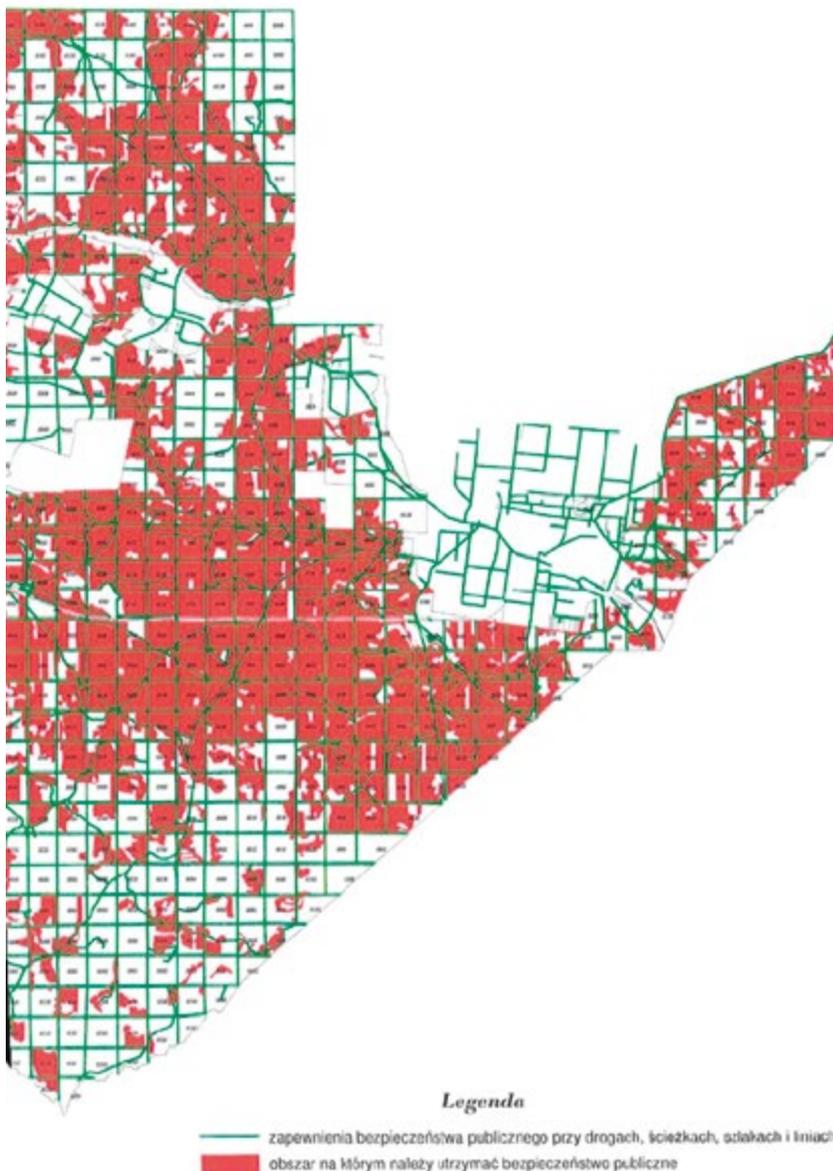
**Fig. 18:** Over 600 spruce trees with no bark and with no bark beetle presence

**direct and indirect impact of recent logging activities** was estimated to amount to **at least 4073 ha of affected forest**. Logging activities resulted in a 26% increase in **fragmentation in the entire Natura 2000 area**. We argue that the ecological impact of logging extends beyond the logged areas because it modifies the landscape structure and affects the ecosystem functioning on a landscape scale. As such, the recent salvage loggings in the Białowieża Forest clearly damaged the conservation value of this precious area, not least by increasing its fragmentation. **To avoid further degradation, we strongly argue for allowing natural tree regeneration on clear cuts and also the extension of the Białowieża National Park to cover the entire forested area”.**

There are significant differences in the dead wood volume (crucial substrate for maintaining Białowieża Forest biodiversity) between the core of Białowieża National Park and managed forest. **Logging operations in 2017 significantly decreased dead wood storage in the managed part of the Białowieża Forest**. This led to a deterioration in conditions of the protected habitats of *Tilio carpinetum* and associated habitats of protected species, particularly owls, woodpeckers and beetles. 13% of dead wood biomass was removed from the managed forest by harvesting operations.



**Fig. 19:** Distribution of dead wood in the Białowieża Forest. A small amount of dead wood (less than 10 m<sup>3</sup>/ha) was on 28% of the area of the Białowieża Forest. Data: Forest Research Institute <http://www.forbiosensing.pl/about-project/life-plus>



**Fig. 20:** Map with areas indicated in red where “there is a need to ensure public safety” according to the Białowieża forest district authority

**THE STATE PARTY OF POLAND DID NOT PREPARE ANY PROPER EVALUATION OF POTENTIAL IMPACT OF THE AMENDMENTS TO THE FOREST MANAGEMENT PLAN (FMP) ON THE BIAŁOWIEŻA FOREST WORLD HERITAGE SITE**

After interventions by European institutions, the **official reason for timber extraction was changed and a new term, “public safety”, started being used, and intensive logging continued.**

On a more general note, the official reason for continued logging often relates to social aspects, mainly the need to ensure **appropriate quantities of timber for the use of local communities.** However, the timber extracted from the Białowieża Forest is being sold to customers all over the country<sup>4</sup>.

Paradoxically, **communities in the region are often faced with deficits of timber at the local market.** According to available sources, demand for timber at the local market in 2015 was estimated at 25 000 m<sup>3</sup>, and was on the decrease. In 2017, SFS sold in total almost 160 000 m<sup>3</sup> of timber from the Białowieża Forest but its **availability at the local market was limited** and only 10% (16 330 m<sup>3</sup>) was sold to local community inhabitants of Hajnówka province<sup>5</sup>. The Forest is being exploited as a source of raw material, most of which is being **sold outside the region.**

In 2017 alone, the Białowieża Forest experienced the **timber extraction on the largest scale seen in the last 30 years, with 180 000 trees cut and 190 000 m<sup>3</sup> of timber extracted** by SFS. The income generated by SFS from timber sale in 2016 – 2017 amounted to **PLN 37 037 000 (approx. EUR 8.6 m<sup>6</sup>).** On the other hand, in 2007–2016, the **loss borne by all three forests districts of the Białowieża Forest was PLN 126.2 m. (c. EUR 29.3 m.).** In 2016 alone, the loss came to PLN 22.9 m. (c. EUR 5.3 m. EUR), which was 58% of the expenditures planned in the budget of the Hajnówka province (45 168 inhabitants<sup>7</sup>) in 2016<sup>8</sup> (PLN 39 661 135).

The screenshot shows the 'e-drewno.pl' website interface. At the top, there is a navigation menu with 'Strona główna', 'Komunikaty', 'Aukcje', 'Słowniki', and 'Rej'. Below the navigation, there is a search bar and a list of regions (Region 1 to Region 4) with checkboxes for selection. The main content area displays a table of public offers for wood sale. The table has columns for 'Lp.', 'RDLP', 'Nadlesnictwo', 'Nr aukcji', 'Gr. handlowo-gatunkowa', 'Zakończenie licytacji', 'Masa', 'Ilość ofert złożonych/wygrujących', 'Cena otwarcia netto', 'Teraz wygrywa', and 'Do końca pozostało'. The table shows 7 offers, with the highest bid being 218 for offer 1.

Lp.	RDLP	Nadlesnictwo	Nr aukcji	Gr. handlowo-gatunkowa	Zakończenie licytacji	Masa	Ilość ofert złożonych/wygrujących	Cena otwarcia netto	Teraz wygrywa	Do końca pozostało
1	Białystok	Nadlesnictwo Hajnówka	0114170464	W_STANDARD SW	2017-09-11 13:04:00	1500	15/12	217	218	8 min
2	Białystok	Nadlesnictwo Hajnówka	0114170463	S_52A SW	2017-09-11 13:26:00	500	3/3	125	125	30 min
3	Białystok	Nadlesnictwo Białowieża	0102170339	W_WD SW	2017-09-12 14:42:00	2000	2/2	173	173	2 dni
4	Białystok	Nadlesnictwo Białowieża	0102170340	S_52A SW	2017-09-12 14:44:00	400	1/1	135	135	2 dni
5	Białystok	Nadlesnictwo Białowieża	0102170341	S_52A_OPAL SW	2017-09-12 14:46:00	2000	0/0	85		2 dni
6	Białystok	Nadlesnictwo Browski	0105170451	W_STANDARD SW	2017-09-13 12:00:00	1500	4/3	195	195	2 dni
7	Białystok	Nadlesnictwo Browski	0105170452	S_52A SW	2017-09-13 12:04:00	2000	2/2	129	129	2 dni

**Fig. 21:** Public offer for the sale of 9 900 m<sup>3</sup> wood extracted in Białowieża Forest districts, e-auction of 11 September 2017 (e-drewno.pl)

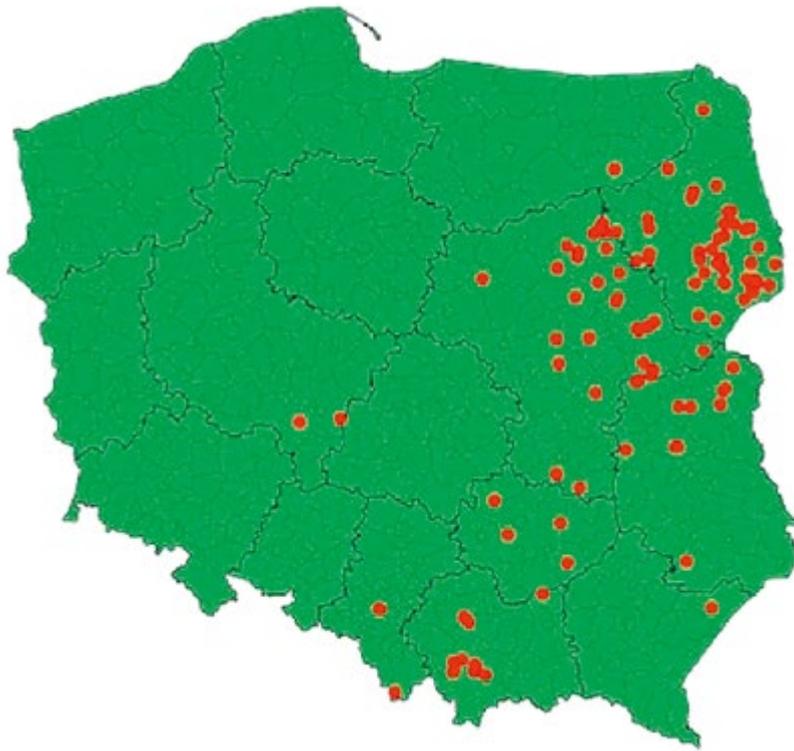
<sup>4</sup> Source: “Białowieża Forest – devastation report 2017”

<sup>5</sup> Data obtained from State Forest districts: Białowieża, Browski and Hajnówka

<sup>6</sup> Average exchange rate published by the National Bank of Poland in 8 February 2019

<sup>7</sup> Ludność. Stan i struktura ludności oraz ruch naturalny w przekroju terytorialnym w 2014 r. Stanu w dniu 30 VI 2014. Warszawa: Główny Urząd Statystyczny, 2014, s. 42.

<sup>8</sup> [http://bip.st.hajnówka.wrotapodlasia.pl/budzet/budzet\\_2016.html](http://bip.st.hajnówka.wrotapodlasia.pl/budzet/budzet_2016.html)



**Fig. 22:** Recipients of timber from the Białowieża Forest District in 2017

Source: "Białowieża Forest – devastation report 2017"



**Fig. 23:** Trucks transporting timber from the Białowieża forest to sawmills in Małopolska region



**Fig. 24:** Forest plots closed for entry (source: SFS)



**Fig. 25:** Yellow “no entry” sign

### **Białowieża Forest closed to the public**

In Spring 2017, large parts of the Forest were closed and started to be patrolled by forest rangers and the police. The Białowieża Forest district managers can periodically prohibit entry only for specific, carefully selected locations. In 2017, this was often misused as a tool to control the public and served as a pretext to conceal the intensified logging from the public. Forest Inspectorates from the Białowieża Forest claimed that parts of the forest posed a danger because there were large numbers of dead trees. The forest inspector is only competent to issue temporary bans, whereas those bans imposed in the Białowieża Forest were introduced “until further notice”, or indefinitely.

This led to many people who at that time took part in peaceful protests in the Białowieża Forest, (including tourists and even journalists who reported on the protests) being sued for entering “closed” parts of the Forest. Later, those bans on entering the Forest were often considered by courts as defective and led to many acquittals.

Finally, those bans were abolished after protests and pressure from local community representatives, including local tourism business owners and representatives of local authorities, as it was very harmful to the local tourist industry.

### The most prominent social movements in Poland

As a result of large-scale commercial timber extraction and destruction of habitats and species, there was **mobilization of a social movement opposing those practices** in 2017. As a result, the movement to protect the Białowieża Forest from logging was one of the most prominent social movements in Poland in recent years. Across Poland, approximately 40 peaceful demonstrations in different cities were organized to halt unprecedented destruction of the forest. Almost 200 000 people signed a petition<sup>9</sup> to stop destructive activities and to enlarge the Białowieża National Park to cover the entire Forest. It is estimated that over 1 500 people took part in demonstrations in the Forest (organized as regular forest walks, lectures, presentations at the logging sites, etc.).

At the same time, several dozen blockades of destructive machines took place to stop the logging and the removal of wood from the forest. Activists stopped the machines with their own bodies by pinning themselves to the harvesters or sitting in their way, making it impossible to pass. The peaceful protests were met with harsh reactions from forest rangers. The State Forest brought in over 70 additional rangers—normally there are no more than 10-15 of them in the whole forest—with the sole purpose of fighting the peaceful protests and ensuring the continuity of logging.

The authorities, especially State Forests and police, responded to those actions with large-scale repressions. In total, activists had over 500 court cases, including 30 criminal cases, potentially leading to imprisonment. The legal basis of these charges were mainly blocking the work of harvesters (causing a loss for the foresters and/or disturbing public order), occupying public offices of the State Forest Authority (classified as a criminal offence), blocking the trucks used for removing illegally harvested wood (blocking public roads), etc. Most of those charges were subsequently dismissed by the court but mainly because the activists received good legal support, and the part played by institutions such as the Ombudsman for Human Rights in their defence.

In 2017, activists experienced numerous physical assaults, handcuffing, hate speech and sexism. A few activists were taken to hospital directly from blockades with various injuries resulting from the rangers’ intervention. As a result of these actions, prosecutors received 12 complaints against the Forest Ranger Service for exceeding their authority, and threatening the lives of and injuring activists.

---

THE STATE FORESTS  
HOLDING DOES NOT  
ACKNOWLEDGE THE  
REASONING THAT  
PREPARATION OF ANY  
PLANS THAT MAY AFFECT  
THE PROPERTY AND ITS  
OUV SHOULD BE PRECEDED  
BY PREPARATION  
OF AN INTEGRATED  
MANAGEMENT PLAN

<sup>9</sup> <https://act.greenpeace.org/page/36705/petition/1>

## 2.7. World Heritage Centre/IUCN Reactive Monitoring mission

The World Heritage Committee *requested* the States Parties to invite a joint World Heritage Centre/IUCN Reactive Monitoring mission to the property to evaluate current and potential impacts of ongoing and planned forest management operations on the OUV of the property and to assess whether the property meets the criteria for inscription on the List of World Heritage in Danger.

The WHC/IUCN Reactive Monitoring mission to the property that was originally scheduled for April 2018 was postponed due to a request from the Polish authorities and took place between 24 September and 1 October 2018.

The NGO Coalition welcomes efforts undertaken by the WHC and IUCN as well as the organizers to make the mission possible. The Coalition also acknowledges the part played by WHC/IUCN experts as well as all the officials, local community representatives, and scientists who took part in the mission and discussions. We wish however to stress **several issues which should be avoided by the State Parties in the future** in order to strengthen further cooperation for appropriate management of the Property and to make sure that the debate on and future management follows both the letter and the spirit of the Convention. These include but are not limited to:

- **invitation** to the meeting with mission experts being issued at short notice;
- **failure to provide the** mission's background and context, mission's ToR and its full program;
- **lack of consultation** regarding the proposed agenda;
- **unclear selection process** for invitees for the meeting and other points of the agenda;
- **failure to provide in the agenda an option of organizing an independent field visit** contrary to previously expressed declarations.
- **selective invitation of scientists** and subsequent invitation of only two scientists from an array of researchers and practitioners who could provide independent evidence.
- **inviting representatives of the major public group** "Locals Against Logging of the Białowieża Forest" **two working days before the mission and only after repeated requests by the group.**
- **denial** (during a telephone conversation with a contact person at the MoE) **that a field visit including NGOs was provided for on the mission agenda.**

In our opinion, the above-mentioned shortcomings created serious obstacles to open, constructive, and effective dialogue. This could have an adverse influence on the findings of the mission. More importantly, this approach raises profound concerns regarding future management of the Property.

---

**NO ACTION WAS UNDERTAKEN TO DATE TO ADDRESS THE IUCN RECOMMENDATION ON A CLEAR DEFINITION AND TECHNICAL GUIDELINES FOR "SANITARY CUTTINGS" AND "SAFETY MEASURES"**

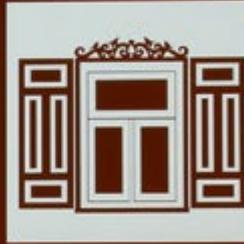
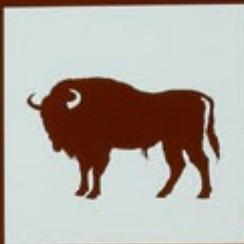
# VISION

---

**No progress has been made by Polish authorities regarding the vision for sustainable development for the Bialowieza Forest region or awareness-raising regarding the value of the Bialowieza Forest.**



# Region Puszczy Białowieskiej



## 2.8. States Parties report on the state of conservation of the property

*Also requests* the States Parties to submit to the World Heritage Centre, by **1 December 2018**, an updated report on the state of conservation of the property and the implementation of the above, for examination by the World Heritage Committee at its 43rd session in 2019, **with a view to considering in case of confirmation of ascertained or potential danger to Outstanding Universal Value, the possible inscription of the property on the List of World Heritage in Danger.**

This section provides commentary and observations on key points included in the 2018 SoC submitted by the State Parties (SoC SP):

### 1. Commercial logging and wood extraction from old-growth forests: The SoC SP states that Polish State Forests do not conduct any commercial logging.

*Commentary:* **The State Forests continue, or are planning, commercial timber extraction from the property, citing human safety and fire prevention as the grounds for this.** The SoC itself admits that extracted wood is being sold on the open market. This practice is considered as commercial timber extraction. Moreover, the SoC report confirms that logging is continuing in old-growth forest areas affected in the past by bark beetle infestations and that such measures “have taken place and will take place”. The intention to continue commercial logging is confirmed by recent information released by the State Forests that amendments to Forest Management Plans are going to be prepared and adopted in the course of 2019.

### 2. Integrated Management Plan: the SoC SP states that work is underway to prepare the plan and that an expert team has been established to prepare “recommendations concerning the management plan” and that “preliminary recommendations for the management plan” will be presented in the first quarter of 2019.

*Commentary:* The Committee requested that a plan be drawn up as a matter of priority. Good practice in development of management plans for WH sites, as properly pointed out in the IUCN Advisory mission report, should be drawn up **collaboratively with the local communities and stakeholders**, and **use appropriate methods and mechanisms to involve all stakeholders**, in particular local and national NGOs and research communities, including the Academy of Sciences and universities as well as local scientists. It should also include stakeholders from the Belarus side and make sure that international expertise is applied in the planning process.

**The approach as described by the SoC PS does not meet any of the above-mentioned requirements.**

---

**NO ACTIONS HAVE BEEN UNDERTAKEN BY THE STATE PARTY OF POLAND TO IMPROVE QUALITY OF GOVERNANCE OF THE WH PROPERTY AND TO INVOLVE ALL STAKEHOLDERS IN THE DECISION-MAKING PROCESS**

**3. Public safety: the SoC SP states that “taking into account the report of the 2016 Advisory Mission due efforts were made to establish clear technical guidelines for cuttings intended to ensure ‘public safety’”.**

The IUCN report recommended as follows: *definition of the concepts of “sanitary cuttings” and “safety measures”: clear technical guidelines should be established for “sanitary” cuttings and “safety measures”, detailing when, where and how those measures can be decided and then implemented; those guidelines should be established by a working group involving all types of stakeholders and be fully compatible with the World Heritage requirements.*

**Bearing in mind that no information was provided to stakeholders and that the guidelines were prepared without their involvement, the statement made in the SoC SP can be considered imprecise at best.**



### 3. OTHER CURRENT CONSERVATION ISSUES WHICH MAY HAVE AN IMPACT ON THE PROPERTY'S OUTSTANDING UNIVERSAL VALUE

---

Since the last IUCN mission, further actions contrary to the principles of the property's protection have been identified: **the forest ground road (Narewowska Road), owned by the State Forests and located in the zones of partial protection I and II is being rebuilt.** According to the nomination file, maintenance of main roads and routes can only be conducted to make them passable in order to ensure fire safety and public safety. The implemented works significantly exceeded maintenance and consisted of widening the roadway, construction of a roadway deep drainage system, construction of a new road foundation, and laying of the new surface (works underway). As a result of State Forests' actions, a **new, upgraded class road along the old trail** was constructed, which will result in an increase in traffic and average speed of vehicles.



*Fig. 26: Previously forest ground road being upgraded with a bituminous layer*

Upgrading the forest road entails significant threats to the wildlife of the Białowieża Forest. According to expert opinions, **increasing the operational and technical parameters of this road will harm the ecosystem, species and habitats in the area in a number of ways.** The most important are: increased mortality of protected species on the road as a result of collisions with vehicles, fragmentation of habitats by creating barriers to animal migration, and degradation of quality habitats of mammals and birds within a radius of up to 2 km. **No proper environmental impact assessment was carried out for the project,** which resulted in the intervention of the European Commission (CHAP (2018)1992.). UNESCO was not informed about this major intervention, and no assessment of impacts on the OUV of the property was conducted, thus breaching paragraph 172 of the Operational Guidelines. Despite the European Commission's notice request-

---

**ECOLOGICAL CONNECTIVITY HAS DETERIORATED SINCE THE NAREWKOWSKA ROAD, LOCATED IN THE ZONES OF PARTIAL PROTECTION I AND II, IS BEING REBUILT. NO PROPER ENVIRONMENTAL IMPACT ASSESSMENT HAS BEEN CARRIED OUT FOR THE PROJECT**

**THE STATE OF  
CONSERVATION REPORT  
BY THE STATES PARTIES  
STATES THAT POLISH  
STATE FORESTS DO NOT  
CARRY OUT COMMERCIAL  
LOGGING, WHEREAS THE  
STATE FORESTS ADMIT  
OPENLY TO A PLAN TO  
CONTINUE COMMERCIAL  
TIMBER EXTRACTION FROM  
THE PROPERTY**

ing that the works be halted and serious concerns expressed by experts of the WHC/IUCN Reactive monitoring mission, the State Forests are continuing construction. Subsequent works conducted after the mission included further laying of a new surface and installing metal roadside (crash) barriers.

The decision to upgrade the road was taken at the sole discretion of the State Forests. The project does not feature in any strategic documents of the Białowieża municipality or the Narewka municipality. Moreover, scientific reports show that increased availability of this road for public traffic increases the risk of fire.

Upgrading the forest road and making it accessible to public traffic constitutes a violation of the World Heritage Property Regulations concerning protection regimes. According to expert opinions, the environmental impacts of this investment will do significant harm to the integrity of the property.

No Environmental and Social Impact Assessment for the OUV was conducted prior to the reconstruction of the Narewkowska Road. The decision to implement the investment did not take into consideration obligatory principles, *i.e.* conducting an impact assessment at a relatively early decision-making stage, close involvement of experts, reliable assessment of indirect and direct effects of the undertaking, designing mitigating measures and reasonable alternative solutions, guarantee of public consultation and involvement of all stakeholders, providing an independent audit of the effects of the undertaking.

**Fig. 27:** Works using heavy machinery on the Narewkowska road



**Fig. 28:** Roadside barriers installed on the Narewkowska road during December 2018



## 4. NEW PLANS/PROJECTS

---

### 4.1. Forest management plans

Despite the fact that intensive logging has been halted as a consequence of massive protests, the future of the Forest is uncertain. After reaching the timber extraction quota for a 10-year period, the Forest Districts of Browsk and Hajnówka requested that Forest Management Plans be annexed to allow continued logging.

In December 2018, the Director of the Regional Directorate of State Forests in Białystok formally asked the relevant institutions to set the scope of the environmental impact assessment of the annexes to the Forest Management Plans of the Białowieża, Hajnówka and Browsk Forest Districts. Under Polish law, this is the first step that formally starts the administrative procedure. According to documents that the NGO received via public information requests, for the Hajnówka Forest District the logging limit shall be increased by almost 1/2, and for the Browsk Forest District by 1/3 (in relation to the entire 10-year limit). These limits would be reached by the end of 2021 – because until then FMPs are in force. In consequence, new annexes would allow commercial timber extraction in the total amount of 171 000 m<sup>3</sup> in the next three years. In January 2019, the results of the tender for the preparation of documentation were announced<sup>10</sup>, which shows that the documentation is planned to be prepared by the end of March this year.

Furthermore, all three forest districts – Białowieża, Browsk and Hajnówka, have announced that they will be seeking contactors for 2019 to “provide forestry services”, which usually include logging, preparing the ground for planting, and planting trees. It also indicates that it is assumed in advance that the result of the environmental impact assessment will be positive, i.e. it will not show a negative impact.

In the above-mentioned context, forest districts in the Białowieża Forest show a financial deficit and are being heavily subsidized. During 2007-2016, the deficit of the districts was PLN 126.2 m (ca. EUR 29.3 m<sup>11</sup>). In 2016 alone the subsidies amounted to PLN 22.9 m (ca. EUR 5.3 m).

### 4.2. Continuation of works on the Narewowska road

Despite serious concerns expressed by scientists, civil society representatives, the European Commission, and experts of the WHC/IUCN Reactive monitoring mission, and despite uncertain administrative decisions that are still to be taken, upgrade of the road is continuing and is expected to be continued in the course of 2019.

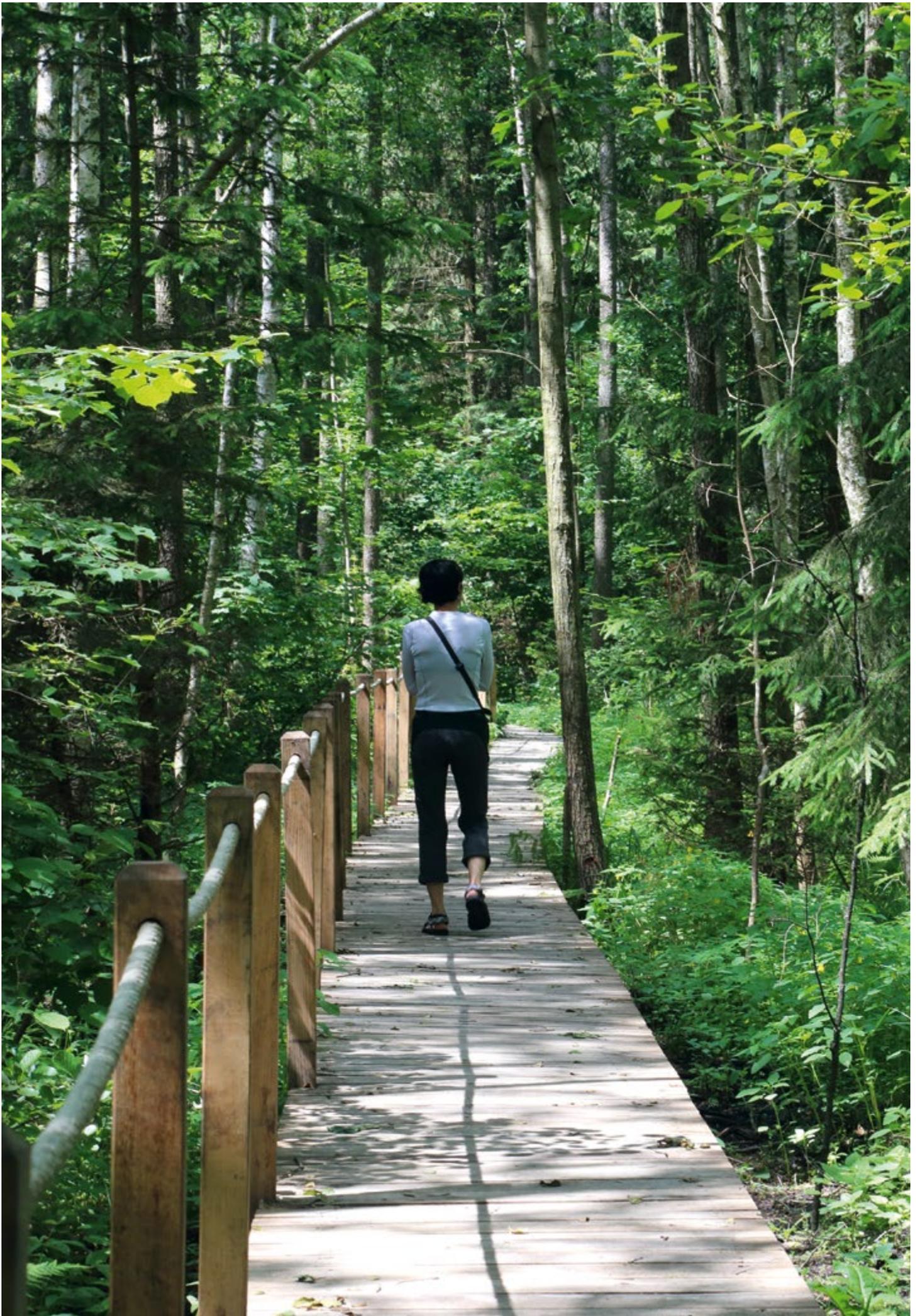
---

**LOCAL TOURISM-RELATED BUSINESSES SUFFERED IN SPRING 2017, WHEN LARGE PARTS OF THE FOREST WERE CLOSED FOR ENTRY AND STARTED TO BE PATROLLED BY FOREST GUARD AND THE POLICE**

---

<sup>10</sup> [https://bip.lasy.gov.pl/pl/bip/dg/rdlp\\_bialystok/zamowienia\\_publiczne/pg\\_201901250588876493057](https://bip.lasy.gov.pl/pl/bip/dg/rdlp_bialystok/zamowienia_publiczne/pg_201901250588876493057)

<sup>11</sup> Average exchange rate of Polish National Bank in 8 February 2019



## 5. PUBLIC ACCESS TO THE SHADOW STATE OF CONSERVATION REPORT

---

The 2019 Shadow report on the state of conservation of the World Heritage property Bialowieza Forest should be made fully available to the public.

---

**STATE FOREST PRACTICES CAUSED MOBILIZATION OF A SOCIAL MOVEMENT OPPOSING THEIR ACTIONS. THE AUTHORITIES, ESPECIALLY STATE FORESTS AND THE POLICE, RESPONDED WITH LARGE SCALE REPRESSIONS**



## 6. FINAL REMARKS

---

The Bialowieza Forest World Heritage site suffers from serious deficiencies in governance and management, especially of the Polish part. This has resulted in deterioration of Outstanding Universal Value, creating hostile relations between involved stakeholders and inability to use untapped potential and ensure fair and equitable sharing of benefits arising from the site.

**All necessary inputs seem to be in place in order to reverse and improve this situation.** Extensive information has been collected and include *inter alia* the Nomination file, decisions of the World Heritage Committee since the site inscription in 2014, and recommendations made by the 2016 IUCN Advisory Mission. We strongly believe that the upcoming report from the WHC/IUCN Reactive Monitoring mission will further consolidate this knowledge and provide additional detailed recommendations that will be subsequently implemented by responsible authorities in full cooperation with relevant stakeholders.

---

ALL NECESSARY INPUTS SEEM TO BE IN PLACE IN ORDER TO REVERSE AND IMPROVE THIS SITUATION. EXTENSIVE INFORMATION HAS BEEN COLLECTED AND INCLUDE INTER ALIA THE NOMINATION FILE, DECISIONS OF THE WORLD HERITAGE COMMITTEE SINCE THE SITE INSCRIPTION IN 2014, AND RECOMMENDATIONS MADE BY THE 2016 IUCN ADVISORY MISSION

100%  
RECYCLED



**Why we are here**

To stop the degradation of the planet's natural environment and to build a future in which humans live in harmony and nature.

more information: [wwf.pl](http://wwf.pl)