

Out of control: The worrying rise of logging in Polish forests



Stowarzyszenie Pracownia
na rzecz Wszystkich Istot



Bystra
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Key findings

- ▶ Wood carried out by State Forests has more than doubled over the last 30 years – from 20 mln m³ in 1990 to 49 mln m³ (gross large timber) in 2019.
- ▶ The state of most Polish Natura 2000 forest habitats is either unfavourable or deteriorating and there are no institutional and civil supervision mechanisms that could reverse this trend.
- ▶ At least two million cubic metres (m³) of wood was harvested without approved Forest Management Plans (FMPs) and without environmental impact assessments.¹ The area of forests managed without approved FMPs covered more than 10% of public forests (780,000 hectares). This includes 290,000 ha in Natura 2000 sites. 110,000 ha of Natura 2000 habitats are located on the territory of Forest Administrations that did not have approved FMPs.
- ▶ In one of the 46 analysed Local Forest Administrations, 100,000 m³ of wood has been extracted before nature conservation authorities gave their opinion on potential impact of logging on environment.
- ▶ In all the 46 analysed Local Forest Administrations, wood was extracted for months based on provisional plans. Provisional plans don't include environmental impact assessments, are not open to public consultation, and are not analysed by nature conservation authorities.
- ▶ Even when forest management authorities gave a negative opinion of the FMP, logging was carried out in valuable forests in habitats of species protected under birds directive.
- ▶ Some inspectorates did not include information on Natura 2000 habitats in their FMPs.

¹ Information on State Forests acquired through an access to public information request.

EU Forest Strategy recommendations

We support an EU Forest Strategy that lays out clear legislation on European Union forest planning and monitoring and recommend that it includes the following:

- 1 A common, obligatory format for FMPs across EU Member States.
- 2 FMPs should be subject to obligatory environmental impact assessments (including impact assessment on Natura 2000 sites) and require approval by nature conservation authorities.
- 3 Harvesting should only take place once FMPs have been formally approved. In public and private forests there should be public consultations of FMPs, the outcome of which should be taken into account while developing the plans.
- 4 FMPs should include information on all Natura 2000 habitats (including those outside of Natura 2000 sites) and outline the conservation measures provided for them.
- 5 Forest management practices should be guided by requirements of nature conservation (e.g. logging should be banned in the breeding season of birds) as well as climate adaptation and mitigation (e.g. protection of soils, water relations).
- 6 Logging in all primary and oldgrowth forests should be immediately stopped. All such forests should be strictly protected to assure an undisturbed course of natural processes

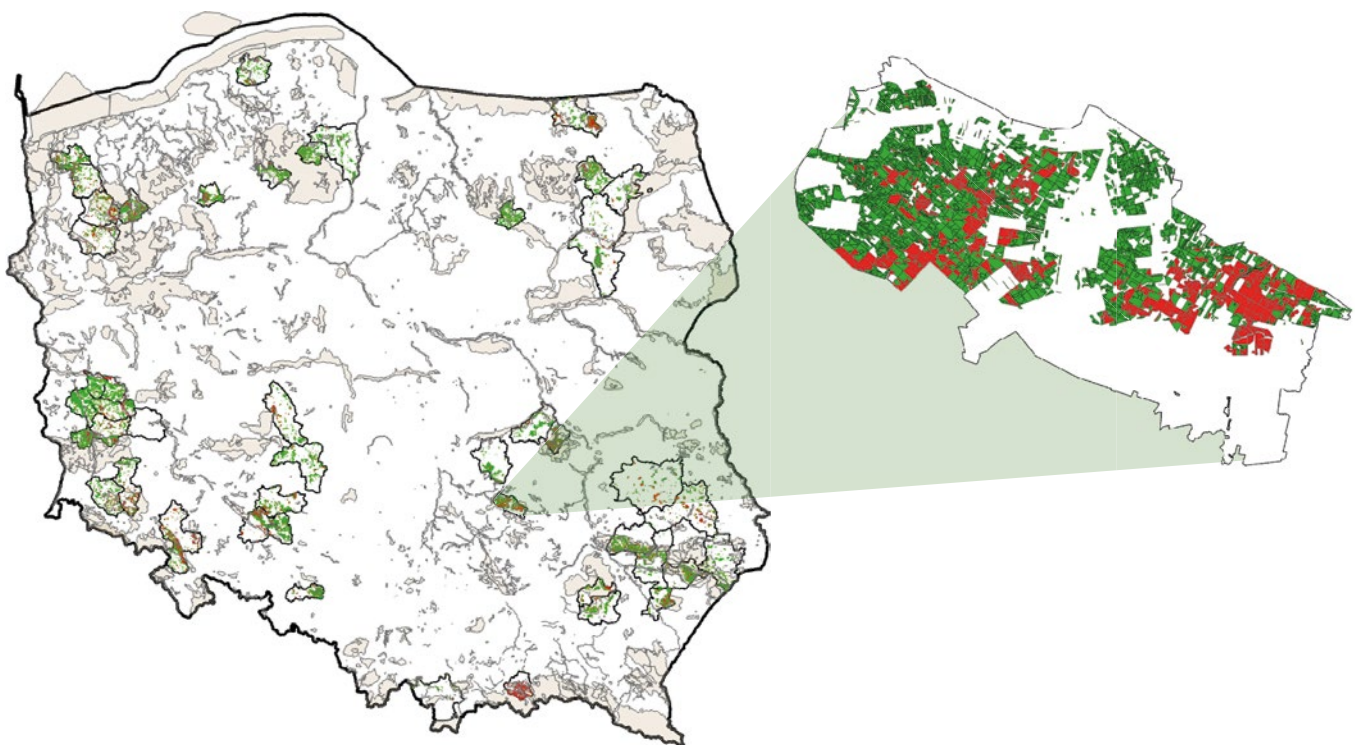
- 7 Communities and NGOs should have the right to take concerns about FMPs to courts or another independent, impartial body established by law.
- 8 The EU should develop an EU-wide, open access database of the state of forests based on annually updated satellite data.
- 9 The EU should unify existing expert groups. This would bring the expert group on forest-based industries and sector-related issues, the Coordination Group on Biodiversity and Nature (CGBN) forest and nature sub-working group, and the Standing Forest Committee into one forum with Member State experts from agriculture and environment ministries, civil society, academics and industry. It will be particularly important to create space for civil society to raise national concerns.

Białowieża Forest – the best-preserved lowland forest in Europe. At the end of 2021 FMPs of forest inspectorates managing most of Białowieża Forest's area expire. Because of the structural problems of forest management described in this report, for the following couple of months these forests may be logged without an approved FMP. Photo: Adam Wajrak



Executive summary

Seventy-five per cent of Polish forests are managed by State Forests (7.1 mln ha). They are all public forests and should therefore be managed on the basis of 10-year Forest Management Plans (FMP), but this is often not the case. As of 17 March 2021, 46 of Poland's 430 Local Forest Administration did not have approved FMPs and 10% of public forests (780,000 ha) were managed without approved FMPs. Of these forests, 290,000 ha are located in Natura 2000 sites. There are 110,000 ha of Natura 2000 habitats within the 46 analysed forest administrations. Between January 2020 and March 2021, at least two million m³ of wood was extracted without approved FMPs in Poland.



LEFT: State forests managed without approved Forest Management Plans (green) with protected Natura 2000 habitats (red) and Natura 2000 sites (grey).

RIGHT: Suchedniów Local Forest Administration, one of 46 Inspectorates without an FMP on 17 March 2021. Forests managed without FMP marked in green, Natura 2000 habitats in red.



Wood harvested in Suchedniów Local Forest Administration without approved Forest Management Plan.

FMPs must be approved by the Environment Minister. Before that they are subject to public consultations, and environmental impact assessments. The Regional Nature Conservation Directorates must also give their opinion, which is not binding for the minister of environment.

FMPs are documents concern activities that can have significant impact on environment. Hence, they should be subject to institutional and civil scrutiny, which is not assured by Polish law. In practice, public consultations of FMPs are non-binding, their outcomes are virtually always ignored and are organized to late, after the logging has already started. Nature conservation authorities' opinions are also non-binding and issued months after logging planned in the FMP has started creating a misleading impression that an impact assessment had taken place. In the gap between the expiry of the former FMP and approval by the Environment Minister, wood extraction continues according to provisional "wood removals plans", which are not subject to public consultations or environmental impact assessments. This lack of supervision occurs every 10 years and lasts for between 3 and 18 months.

Just looking at the Suchedniów Local Forest Administration, we can see that 115,000 m³ of wood was extracted without an approved FMP – 40,000 m³ came from protected Natura 2000 habitats. 42,000 m³ of wood was extracted before



Clearcut in Nature 2000 site in Suchedniów Local Forest Administration carried out without approved Forest Management Plan.

the public consultation even started. 100,000 before the opinion by nature conservation authorities.

Logging in Borki Local Forest Administration continued from January 2020 to April 2021 without an approved FMP, during which time at least 127,000 m³ of wood was harvested. Logging continued despite the nature conservation authorities giving a negative opinion of the draft FMP. Wood was also harvested in forest divisions that according to conservation authorities should have been excluded from active management because of their high natural value and presence of protected species (e.g. *ficedula albicollis* and *ficedula parva* both listed in Annex I to the birds directive). Regional Directorate of Nature conservation concluded that realization of the FMP for 2010–2019 decreased the area of old-growth forests in Borki Forest Administration by 1,200 ha.

Stuposiany and Lutowska Local Forest Administrations show that the problem is structural. They are responsible for managing some of the last unprotected old growth forests in the Polish Carpathians, but logging continues there despite the conservation authorities concern about the potential negative impact of activities included in their FMPs on priority Natura 2000 habitats.

Another problem is that State Forests do not oblige Local Forest Administrations to demonstrate the presence of Natura 2000 habitats located outside Nature 2000 sites in their FMP and as a result no conservation measures for these habitats are planned. An example is Katowice Local Forest Administration, where over 2,600 ha of Natura 2000 habitats were not included in the FMP.

Increasing wood harvesting is posing a threat to forest biodiversity. Large timber extraction more than doubled over the last three decades and is predicted to grow for the next 20 years (graphs 1 and 2). It is even encroaching into natural forests such as Białowieża Forest and the Carpathians. According to the Habitats Directive progress report for 2013–2018, forestry is the biggest threat to Polish Natura 2000 forest habitats, 28% of which are deteriorating and 48% of which are in an unfavourable state.²

Citizen interest in forestry can help to reverse this trend as intensifying wood extraction is opposed by the public – 75% of people want to reduce the area where logging takes place³, and there are 250 local anti-logging campaigns ongoing in Poland⁴. Despite this, the Polish legal system has no mechanisms to ensure public participation in decision-making around public forest management. In addition, FMPs cannot be referred to courts, although this is being challenged at the Court of Justice of the European Union (CJEU). Even if the CJEU forces Poland to ensure access to justice, this will not ensure communities have the right to a say about what happens to the considerable forest areas that are managed without FMPs.

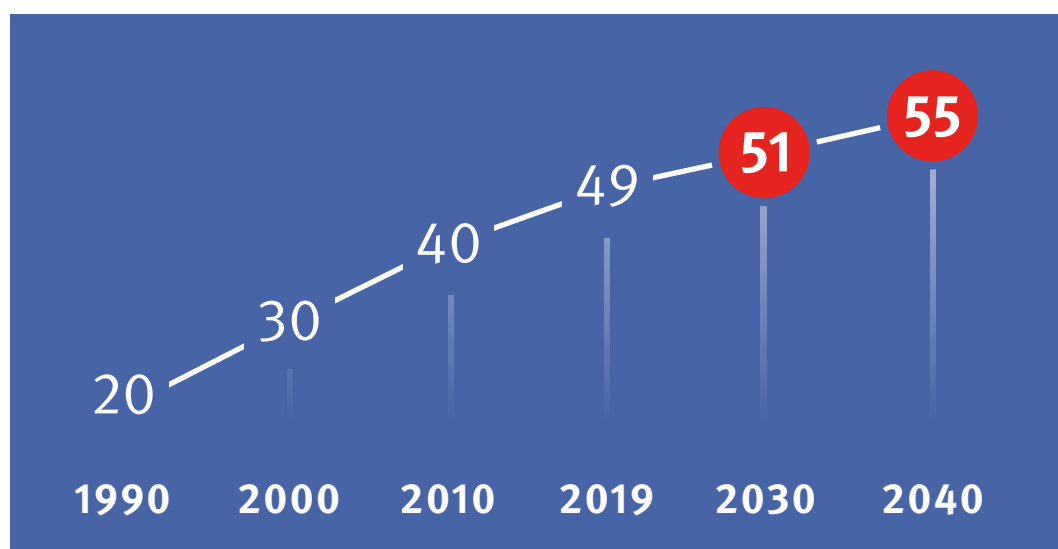
Forests contribute in many ways to the wellbeing of people. They help us to rest, protect the soils, regulate water relations, host biodiversity and store carbon helping to tackle environmental-climate crisis. Their protection and management with participation of communities is not only an expression of responsibility for future generations but also realization of EU law requirements.

² European Environmental Agency (<https://www.eea.europa.eu/themes/biodiversity/state-of-nature-in-the-eu/article-17-national-summary-dashboards/conservation-status-and-trends>)

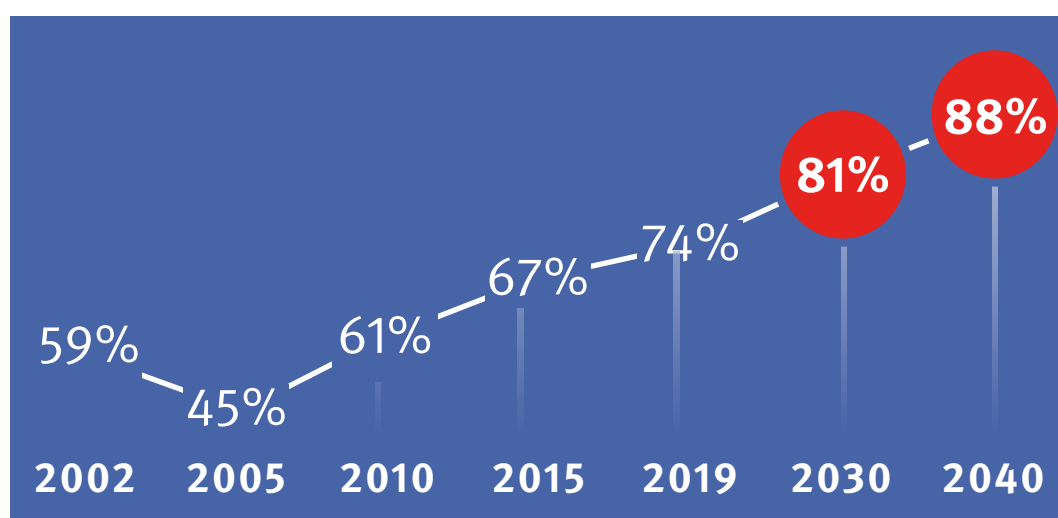
³ Unpublished public opinion poll ordered by Association Workshop for All Beings

⁴ <https://mapy.lasyiobywatele.pl/inicjatywy-obywatelskie.html>

GRAPH 1: Increase in wood extraction in forests managed by State Forests in the period from 1990 to 2019 in mln m³ of gross large timber⁵. Values marked in red are predictions of future wood extraction under the assumption of no change in the forestry model⁶.



GRAPH 2: Increase of wood harvest expressed as the proportion of increment since 2002 until 2019⁷. Prediction until 2040 assumes no change in the forestry model⁸ (values marked in red)




⁵ Statistics Poland. (2020) Statistical Yearbook of Forestry. Warsaw.

⁶ Wysocka-Fijorek, E. (2021) The impacts of strict protection of large areas of Poland's forests on the possibility of (net) carbon sequestration by Polish forests and the production of wood (Original in Polish: *Konsekwencje objęcia ochroną ścisłą znacznych obszarów leśnych Polski na możliwość sekwestracji węgla (netto) przez polskie lasy oraz produkcję drewna z uwzględnieniem sortymentacji*), Sękocin Stary.

⁷ Statistics Poland, Ibid.

⁸ Wysocka-Fijorek, E., Ibid.



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