

Report on the State of Conservation

Białowieża Forest World Heritage Site (Belarus, Poland) (N 33ter)

A. Executive Summary of the report

[Note: each of the sections described below should be summarized. The maximum length of the executive summary is 1 page].

Belarus and Poland, the State Parties to the Convention, acknowledged with due attention the Decision of the World Heritage Committee taken during its 40th session (Istanbul, 2016), concerning the Białowieża Forest World Heritage Site. Referring to the provisions of the Decision imposing specific commitments on the State Parties, we submit to the World Heritage Centre information on the state of conservation of the Site and the progress in the implementation of the Decision.

The amendments to the Forest Management Plan (FMP) for the Białowieża Forest District¹, recently adopted for the Polish part of the Białowieża Forest will enable the active conservation of species and habitats and is dictated by the concern about the state of the environment of the Site and the need to halt the decay of old growth forests. Deterioration of the state of conservation of natural habitats within Natura 2000 in the forest ecosystems of Białowieża Forest, caused by natural succession and impacts of many organisms, including, among others, the bark beetle community and numerous pathogens.

The massive, intensive and multiannual outbreak of the bark beetle (*Ips typographus* L.) which took place in recent years in the Polish part of Białowieża Forest was on an unprecedented scale, wreaking havoc in the spruce stands in the property. In the opinion of the State Party, this was caused by failure to apply preventive measures (including e.g. the removal of trees infested by bark beetle) and remedial measures on the part of the authorities obliged to do so. The World Heritage Centre was informed about this situation by an official letter submitting the position of the Steering Committee of 22 March 2016.

The bark beetle outbreak still continues, causing a large-area decay of spruce stands. An enormous number of dead spruce trees amounting to more than 796,000 was found in the area managed by State Forests (excluding nature reserves and the whole area of Białowieża National Park). Sanitary cuttings to eliminate the risk that the outbreak may spread to farther areas of the Forest should halt a massive dieback of spruce trees. It should be emphasised that these cuttings were envisaged in the nomination application concerning the property, in accordance with the amendments adopted to the FMP, can be

¹ A forest district is an organisational unit of State Forests; the organizational units within the area of Białowieża Forest include three Forest Districts (Białowieża, Browsk, Hajnówka) and the Białowieski National Park .



applied only outside protected areas, exclusively on the sites considered to require human intervention. The applied solution complies with Polish and EU law and planning documents and will have no adverse effect on the Outstanding Universal Value (OUV) of the property, as it will not disturb its natural processes. Those measures will not have an adverse effect on the preservation of biodiversity connected with dead wood, especially fungi and saproxylic invertebrates. In accordance with the re-nomination application of 2012, wood is still not harvested for economic reasons and fellings are justified by ecological requirements: active sites and specious protection, the bark beetle outbreak, renaturalization of stands which have been transformed by man in the past.

An important social problem is also the fact that the accumulation of dying or dead trees poses a danger to public safety and may lead to the exclusion of many areas of the Forest from tourist traffic, preventing the possible sustainable development of the region. Dead trees pose a great danger in many places of mass-scale human rest, e.g. in the vicinity of tourist trails, car parking lots, places where natural or cultural sites are visited. In order to ensure safety for people visiting Białowieża Forest and to reduce the strongly increasing fire risk, it is necessary to remove dead trees standing along tourist trails and places of rest and recreation in the forest.

In its area the Białowieża National Park monitors on an ongoing basis the state of the environment and nature, using its own resources. Moreover, in agreement with the Park, in this area research and monitoring projects are carried out by external institutions.

In an area of 60,000 ha, on 25 March 2016 a multiannual research project was launched, which will enable observation and assessment of changes in natural habitats in sustainably managed forests and reference zones, i.e. on sites unaffected by human intervention. The results of the biodiversity monitoring in these areas will enable an assessment to determine which method will ensure the conservation and, in consequence, the preservation of the particular components of the biodiversity of the Forest. The field part of the biodiversity inventory in forest ecosystems and the identification of the cultural heritage of human activities in Białowieża Forest has already been completed. At present, the collected data are elaborated. It is important to emphasise the huge dimension of this project – more than 200 experts took part in the inventory and more than 1,400 research plots were designated. The surface area of the Belarusian part of the Białowieża Forest World Heritage Site is 82,306 ha. In 2016, legislative amendments were adopted concerning the conservation of the Belovezhskaya Pushcha National Park. The surface area and location of the functional zones of the National Park were changed. The strict conservation area was increased by 1,250 ha.

In 2016, in the territory of the property measures were taken to restore the water regime in disturbed forest areas: 17 weirs were built on forest-based drainage canals and works were begun to restore the hydrological regime on a dried-out lowland marsh with a surface area of 1,100 hectares. 17 scientific research projects were implemented, including international technical assistance.

In the Belarusian part of the property, the ban on felling covers 66,674 ha (94% of the forest area).

The extent of forest management in the Belarusian part of the World Heritage property in 2016: sanitary cuttings (in spruce dieback focal areas) – 22,024 m³ in a surface area of 917 ha; thinning (in artificial pine plantations) – 6,051 m³ in a surface area of 177 ha; the removal of dangerous trees along roads and power transmission lines, as well as for fire protection purposes – 4,029 m³ (including 440 m³ not removed from the ecosystem).

In 2016, in the territory of the World Heritage property there were no fires or windfalls.

In 2016, about 375,000 persons visited the National Park, including 250,000 persons (66%) who stayed within the boundaries of the buffer zone of the World Heritage property.

The Ministry of the Environment of the Republic of Poland, the Ministry of Natural Resources and Environmental Protection of the Republic of Belarus and all the authorities managing the area of Białowieża Forest take all effort to strengthen their mutual cooperation and to continue their dialogue with the local communities and nongovernmental organisations.

The documents required by the Decisions of the UNESCO World Heritage Committee, including e.g. the Assumptions for the Integrated Management Plan for the Białowieża Forest Site and the Report on the State of Conservation of the property, are prepared and agreed at the forum of the Polish-Belarusian Working Group on the Białowieża Forest Transboundary World Heritage Site, operating as part of the Polish-Belarusian Committee for Cooperation in Environmental Protection.

B. State of conservation of the Białowieża Forest UNESCO World Heritage Site

I. State of conservation of the Polish part of the Białowieża Forest UNESCO World Heritage Site

1. Response to the Decision of the World Heritage Committee [40 COM 7B.92]

[Note: *The State(s) Party(ies) is/are requested to address the most recent decision of the Decision of the World Heritage Committee for this property, paragraph by paragraph*]

The information presented below concerns the implementation of the Decision of the World Heritage Committee [40 COM 7B.92] with respect to its individual points.

Point 3 of the Decision: Notes with concern the recent amendments to the Forest Management Plan for the Białowieża Forest District in Poland which would provide for a threefold increase in fellings, including in mature stands, and the recently adopted "Programme for the Białowieża Forest as a UNESCO Natural Heritage and a Natura 2000 site", which would allow active habitat restoration interventions in two thirds of the area of each of the three Forest districts in Poland within the property which could result in disturbance of natural ecological processes;

The adopted amendments to the Forest Management Plan for the Białowieża Forest District authorising the enhancement of fellings and the Programme for the Białowieża Forest as a UNESCO Natural Heritage Site and a Natura 2000 Site were dictated by the concern about the state of the

natural environment of the property and the need to halt further adverse natural effects in forest ecosystems caused by an intensive bark beetle outbreak. The scale of the massive dieback of spruce stands is one of the largest registered to date. An unfavourable combination of the weather conditions in 2012 and failure to take protective measures consisting in the detection and early removal of bark beetle-infested trees from the forest caused an uncontrolled and very strong development of the bark beetle population. This species usually colonises old spruce trees, but in 2015 it commonly occurred in young spruce stands (even 20- year- old stands), medium-aged ones and often on Scots pine. The bark beetle outbreak which took place in recent years in the Polish part of Białowieża Forest was unprecedented, wreaking havoc in the spruce stands in the property. In the opinion of the State Party, this was caused by failure to apply generally known preventive and remedial measures on the part of the authorities obliged to do so. In 2016, the bark beetle outbreak was not halted and still continues. The planned sanitary cuttings, which were also envisaged in the nomination application concerning the Property, are to be applied, in accordance with the amendments adopted to the FMP, outside protected areas, exclusively on the sites considered to require human intervention. It is important to note the very slight forest harvesting level of about 0.8 m³ per 1 ha of the forest in a year. In order to protect ecological processes, with Decision 52 of the Director General of State Forest, on 31.03.2016 functional areas with reference functions were delineated with a surface area of 5,610 ha (4,137 ha in the southern part of the Białowieża Forest District and 1,473 ha in the north-eastern part of the Browsk Forest District), where forest management was to be carried out solely to ensure the shaping of biodiversity and, practically, only as a result of natural processes. The concept of the conservation of ecological processes is thus expanded and developed. The Regional Directorate for Environmental Protection carries out work to maintain the proper conservation within the nature reserves in Białowieża Forest.

Point 4 of the Decision: Welcomes the State Party's invitation of an IUCN Advisory mission in June 2016, to provide recommendations regarding how the recent amendments to the Forest Management Plan relate to the requirements for protection of the property's Outstanding Universal Value;

The report of the IUCN Advisory Mission which took place in June 2016 on the invitation of the State Party of Poland contained many valuable suggestions as to how the process of managing the property could be improved. On the other hand, in the opinion of the State Party of Poland, the summary of the report failed to include many important items of information which both the Government and scientific communities had provided to the IUCN. Thus, the report failed to take into account the full arguments justifying the remedial measures introduced on the property. In this context, with a view to ensuring full objectivity and transparency of the actions of the UNESCO, presenting the documents required by the provisions of the Decision, the State Parties will submit to the World Heritage Centre additional materials and documents which have been provided to the experts in the course of the IUCN Advisory Mission or forwarded afterwards.



Point 5 of the Decision: *Recalls that the Statement of Outstanding Universal Value (OUV) of the property emphasizes its undisturbed natural processes and the consequent richness in dead wood, standing and on the ground, which leads to a high diversity of fungi and saproxylic invertebrates;*

The applied solution complies with Polish legislation and planning documents and will have no adverse effect on the Outstanding Universal Value (OUV) of the property, as it will not disturb its natural processes, its richness in dead wood, standing and on the ground, which ensures a high diversity of fungi and saproxylic invertebrates.

As part of the project Comprehensive monitoring of stand dynamics in Białowieża Forest supported with remote sensing techniques (co-financed from the resources of the European Commission under the Life financial instrument and those from the Polish National Fund for Environmental Protection and Water Management) carried out by the Polish Forest Research Institute, in 2015 throughout the Polish part of Białowieża Forest 685 ground-based monitoring plots were established. The quantities of dead wood were identified on the individual research plots and for forest habitat types. The maximum total volume of dead wood did not exceed 582 m³/ha (representing the dieback of an entire stand).

Summary and conclusions of the research project

1. Białowieża Forest is characterised by substantial average abundance of dead wood. A very large quantity of dead wood (exceeding 30 m³/ha) occurred in almost 60% of the research plots, including about 30% of the plots which were characterised by the extreme abundance of dead wood in excess of 100 m³/ha. In the nature reserves and Białowieża National Park, respectively, 35% and more than 40% of the research plots were characterised by high abundance of dead wood. In protective forests, on more than 15% of the research plots the abundance of dead wood exceeded 100 m³/ha.
2. Low abundance of dead wood, up to 10 m³/ha, was found only on about 20% of the research plots. The largest share of these research plots was observed in protective forests (35%) and the smallest in the nature reserves (several per cent). In the Białowieża National Park, this share was slightly larger, i.e. about 12%.
3. In the Białowieża National Park, nature reserves and protective forests, the highest average abundance of dead wood was found for spruce; moreover, in the first category of forest conservation dead wood on the ground dominated, whereas in the other two categories standing dead wood distinctly prevailed.
4. In protective forests the average abundance of dead wood was almost four times higher (40 m³/ha) than in the Białowieża National Park, whereas the highest abundance occurred in nature reserves (in excess of 100 m³/ha). An opposite situation was found in the case of dead wood on the ground. It should be emphasised that the average abundance was the highest in nature reserves, followed by protective forests, and, unexpectedly, it was the lowest in the Białowieża National Park.

5. The abundance of dead wood in the Białowieża Forest enables the free development of saproxylic organisms and fungi and the preservation of the biodiversity of organisms related to dead wood.

Point 6 of the Decision: Requests 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;

Along with the present report, the State Party of Poland hereby submits an evaluation of the potential impacts of the Amendment to the Forest Management Plan on the Outstanding Universal Value of the property as required by Decision 40 COM 7B.92.

Point 7 of the Decision: Takes note of the conclusions of the IUCN Advisory Mission and underlines the need for the State Party to consider the conclusions with all relevant stakeholders;

The report from the IUCN Advisory Mission was provided to all the stakeholders as part of public consultations carried out from 13 to 23 October 2016. All the comments received were analysed by the public administration authorities. The collected opinions, suggestions and proposals constitute an annex to the present report. Moreover, as part of the preparation of an integrated management plan for the property, more consultations are planned with a wide range of stakeholders.

Point 8 of the Decision: Also requests 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 considers that such commercial timber extraction would represent a potential danger to the property in accordance with Paragraph 180 of the Operational Guidelines;

In accordance with the re-nomination application of 2012, wood is still not harvested for economic reasons and fellings are justified by ecological requirements: the bark beetle outbreak or the reconstruction of stands which have been transformed by man in the past. Dying and dead trees are removed to ensure public safety on tourist trails and at places of rest and recreation in Białowieża Forest.

The uncontrolled development of the bark beetle population seriously undermines the equilibrium which ensures the continuity and integrity of the protected old-growth forest. The results of the disturbance of the forest ecosystem of Białowieża Forest in the form of a decay of spruce stands in a large area include a sudden appearance of a large quantity of dead wood and also a periodic development of the related valuable insects; in particular, saproxylic insects. However, the depletion in a relatively short time (through a massive dieback of spruce stands caused by the developing bark beetle outbreak) of the wood stock of dead spruce trees will lead, in the long term to a destabilisation

of these valuable populations, and in the extreme cases to the disappearance of valuable species, i.e. to further depletion of the ecosystem of Białowieża Forest. As a result of the complicated network of ecological interactions among species, it is very difficult to predict the real effects of the outbreak-based development of bark beetle, but they may possibly lead to far-reaching changes in the forest structure and a complete change of its character.

Point 9 of the Decision: Notes 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 reiterates 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;

The Polish-Belarusian Working Group on the Białowieża Forest Transboundary World Heritage Site, operating as part of the Polish-Belarusian Committee for Cooperation in Environmental Protection, launched its work to prepare the Transboundary Site Management Plan for Białowieża Forest. The Polish and Belarusian administrations treat this task as a priority. Its purpose is to adopt a coordinated approach to the management of the property. However, the completion of the work, including the implementation of extensive consultations, may take longer than six months. In consequence, as in the case of the previously adopted planning documents (the conservation plan for the Białowieża National Park, the plan of conservation measures for the Natura 2000 site and the Forest Management Plan), which needed several years (4 or 5 years) to be prepared and agreed with all the stakeholders, the completion of the Management Plan for Białowieża Forest required by the Decision of the World Heritage Committee will need more time. The State Parties will take efforts to ensure that the integrated plan is prepared as soon as possible.

2. Other current conservation issues identified by the State(s) Party(ies) which may have an impact on the property's Outstanding Universal Value

[Note: this includes conservation which are not mentioned in the Decision of the World Heritage Committee or in any other information request from the World Heritage Centre]

In the opinion of the State Party of Poland, as a result of the reduced wood harvesting in the area managed by State Forests, planned in the period from 2012 to 2021 compared with the period from 2002 to 2011, the populations of harmful insects and pathogens substantially grew. This caused a massive dieback of an enormous number of trees – in the case of spruce alone, almost 800,000 trees in the area managed by State Forests. In consequence, the dieback of trees led to an increasing degradation of habitats and a decline of valuable species and those of priority EU importance.

In the Białowieża, Browsk and Hajnówka Forest Districts, since 2012 the number of dying spruce trees has been seen to grow as a result of an attack by bark beetle on them. This process was most intense in the Białowieża Forest District, where in the period from 2012 to 2016 about 430,000 dead spruce trees were found, with the estimated mean volume of 555,000 m³. Fewer dead spruce trees were identified in the Browsk Forest District (almost 200,000 dead trees, representing 244,000 m³). The decay of spruce stands was slowest in the Hajnówka Forest District, an area most distant from the Białowieża National Park (about 169,000 dead trees, representing 256,000 m³). Altogether, in the area managed by the State Forests National Forest Holding more than 796,000 spruce trees with the total volume of 1,055,000 m³ were infested.

The only method known to science for combating bark beetle is the removal of infested trees before the insects manage to move to the neighbouring trees.

As a result of the rapid growth of the number of dead trees, the fire risk has greatly increased, as dry and quickly wilting standing trees pose a danger to both the residents and visitors to Białowieża Forest. The Polish law imposes on forest owners (managers) the obligation to shape the balance in forest ecosystems, to enhance the natural resilience of stands and, in particular, to carry out preventive and protective measures to avoid the outbreak and spread of fires. The environmental changes in Białowieża Forest caused by the persistence of large masses of dead wood, arising as a result of a bark beetle outbreak and the dieback of spruce stands, changes in the water regime and the emergence of large fragment of thinned stands with grass cover increase the potential fire risk. For these reasons, there is a risk that more rapidly spreading fires may break out and, as a result, large-area fires may develop. In order to raise the level of fire safety in forest areas, a number of measures have been taken:

- although the Forest Districts in Białowieża Forest have been classified as category III of fire risk, they run alarm and dispatch points and carry out fire protection surveillance in accordance with the rules applicable to Forest Districts of category II (under the Regulation of the Regional Director of State Forests in Białystok);
- in the areas considered to be particularly vulnerable to fire ground patrols have been launched, (among others),
- the elaboration of the fire protection rules for protected areas has been commissioned, taking into account the impact of dead wood at the various stages of decay on the fire risk;
- the implementation of local fire load density measurements has been commissioned.

Preservation-oriented conservation measures should be carried out continuously to minimise the risk that falling trees may pose a threat to public safety. In this case, it is necessary to monitor the dieback of trees close to roads and tourist trails.

2.1. The information below describes the situation and actions carried out on the Białowieża Forest property in 2016 both in the area managed by the State Forests and in the Białowieża National Park:

The Polish part of Białowieża Forest is managed by different entities, i.e. the Białowieża National Park and the State Forests National Forest Holding (State Forests). In addition, there are also different mutually overlapping forms of nature conservation and, in consequence, also different nature conservation authorities which are responsible for the implementation of tasks within the area of Białowieża Forest. Taking the above information into account, the information on the situation and actions carried out on the Białowieża Forest property is presented with respect to relevant entities, as this will make it possible to present with clarity the scope of tasks carried out by the individual managers.

2.1.1. The Białowieża National Park

Large numbers of tourists and visitors to the region of the Białowieża Forest region used facilities and tourist trails and routes provided by Białowieża National Park. Traditionally, the European Bison Demonstration Reserve is the most popular and has been visited by app. 150,000 people.

As part of the educational activities implemented by the Białowieża National Park, a large number of classes were addressed mainly to children and youth from schools and other education and upbringing establishments in the Białowieża Forest Euroregion. They included e.g. indoor and outdoor educational classes, competitions in nature-related and ecological knowledge, thematic walks, ecological and educational festivals and picnics, an exhibition of Białowieża Forest mushrooms, multimedia presentations and on-line educational games. Nature bulletins and educational brochures were published. These classes were attended by about 11,500 persons.

The actions launched by the Białowieża National Park in the areas of culture and education mainly include the organisation of exhibitions, including temporary ones, concerts, film shows and other events. Museum-based workshops and classes, conferences and seminars were held and the cooperation with other institutions was developed.

There is no doubt that the new educational pavilion being built at the European Bison Demonstration Reserve will contribute to better knowledge and understanding of the World Heritage property through education, the dissemination of knowledge concerning the European bison, the species-specific diversity in Białowieża Forest and their mutual relationships. This building is constructed in the passive technology.

1) Active conservation measures at the Białowieża National Park in the period from January to October 2016 and the sales directions.

As part of its active conservation measures, in 2006 (from January to October) the Białowieża National Park harvested 1,262 m³ of wood in relation to:

- a) the clearance of a road strip in an area covered by active conservation (13 m³),
- b) the tending for clumps of trees at the Palace Park (32 m³),

- c) the elimination of an alien species – red oak (36 m³),
- d) the removal of excessive lying and dead trees posing a danger to movements of humans and animals within the enclosures of the European Bison Breeding Centre (1,180 m³).

The harvested wood was disposed of in the following ways: about 600 m³, i.e. 47%, was fuelwood which was sold on the local market to the residents of the Communes of Białowieża, Hajnówka and Narewka. The other wood types, in an amount of 640 m³, were also sold to the residents or businesses of the Communes of Białowieża, Hajnówka and Narewka. 23 m³ of wood was used by the Białowieża National Park to meet its own needs.

In 2006 (from January to October), no wood thefts from the Białowieża National Park were registered.

2) Information on the transboundary cooperation in all fields

In 2016, the activities of the partners of the Białowieża Forest UNESCO World Heritage Site in the field of transboundary cooperation included:

- the participation of the representatives of the Belovezhskaya Pushcha National Park in meetings of the Scientific Council of the Białowieża National Park and the participation of the representatives of the Białowieża National Park in the Scientific Council of the Belovezhskaya Pushcha National Park;
- the participation in meetings concerning the Białowieża Forest World Heritage Site, including a visit paid by the representatives of the IUCN and the European Commission, as well as meetings of the Steering Committee;
- the co-organisation of the Scientific Conference on “Tourism in Valuable Natural Areas”, together with the Local Forestry Faculty of the Białystok University of Technology in Hajnówka,
- the participation in the 1st meeting of the Working Group on the Białowieża Forest Transboundary World Heritage Site, operating as part of the Polish-Belarusian Committee for Cooperation in the Field of Environmental Protection.

3) Tourism pressure

The tourist traffic in the Białowieża National Park in 2016 (from 1 January to 31 October) was as follows: the area of the former Strict Reserve was visited by 26,464, including 3,965 foreigners; the Nature and Forest Museum - 71,800 persons, including 3,388 foreigners; the European Bison Demonstration Reserve - 148,632 persons, including 9,590 foreigners; and the active conservation area of the Protective Compartment “Reserve” – app. 20,000 persons. Within the Strict Reserve, to an increasing extent different methods are used to limit the anthropressure, including e.g. the erection of mobile walkways in places most vulnerable to trampling.

Within the Białowieża National Park, there are 44.3 km of tourist trails and routes. In 2016 a section app. 1 km long was closed for a total period of 15 days due to intensive rainfalls and excessive drenching of routes. Because of strong winds, the 4 km long route to the Jagiełło Oak was excluded

from the traffic route for a total of 5 days, while for 3 days the whole forest area of the Park (except for the European Bison Demonstration Reserve) was closed to tourist traffic.

4) The educational activities implemented by the Białowieża National Park. The number of participants, target groups, topics and types of classes

As part of the education activities implemented by the Białowieża National Park staff in the period from 1 January to 31 October 2016, a large number of classes were addressed mainly to children and youth from schools and other education and upbringing establishments in the Białowieża Forest Euroregion. They included e.g. indoor and outdoor educational classes, competitions in natural and ecological knowledge, thematic walks, ecological and educational festivals and picnics, an exhibition of Białowieża Forest mushrooms, multimedia presentations and on-line educational games. Nature bulletins and educational brochures were published. These classes were attended by about 11,500 persons.

5) Cultural aspects

The cultural-educational context of operation of the Białowieża National Park included events such as organisation of diverse topic exhibitions, cooperation with different institutions consisting of participation in conferences or meetings. Educational and museum-based classes and workshops were also delivered during the cultural activity.

6) The monitoring of the current state of the environment and nature

The monitoring of the current state of the environment and nature within the Białowieża National Park (the BNP) in 2016 (the implemented projects and monitoring surveys).

Research and monitoring projects implemented by the BNP with its own resources:

- The structure and dynamics of the forests in the BNP
- The monitoring of the abiotic environment and the hydrological conditions in the BNP
- The valuation of the meadows in the BNP
- The monitoring of plants of special concern (protected by the Białowieża Forest Natura 2000 Site, the Red Data Book and species-specific conservation)
- The monitoring of invasive species in the Park

Research projects and monitoring surveys implemented by external institutions, in agreement with the BNP:

- Comprehensive monitoring of stand dynamics in Białowieża Forest supported with remote sensing techniques (the Department of Natural Forests of the Forest Research Institute)

- Monitoring of rare woodpeckers as part of the monitoring of Polish birds (the Polish Society for the Protection of Birds - OTOP)
- Studies on the abundance of breeding birds on permanent plots (Department of Avian Ecology of the Institute of Zoology, Wrocław University)
- The functioning of the European bison population in Białowieża Forest. The research on the postnatal development of the European bison (the Mammal Research Institute of the Polish Academy of Science)
- Monitoring of the helminth infestation of the European bison in Białowieża Forest (the Institute of Parasitology of the Polish Academy of Science)
- Wolf and lynx inventories in the Forest Districts and National Parks in Poland (the Mammal Research Institute of the Polish Academy of Science)
- An assessment of the state of the forest environment in the low-risk zone (the Department of Natural Forests of the Forest Research Institute)
- The distribution and density of herpetofauna in the BNP (the Białowieża Forest District)
- The inventory carried out by State Forests as part of the project “An assessment of the state of biodiversity in Białowieża Forest based on selected natural and cultural elements”.

2.1.2. The State Forests National Forest Holding: the Białowieża, Browsk and Hajnówka Forest Districts

1) Wood harvesting /m³/ in the particular zones in the individual Forest Districts in 2016: the status as of 7.11.2016

Zone	Białowieża Forest District	Hajnówka Forest District	Browsk Forest District
I	-	-	-
II	-	-	-
III	-	-	-
IV	3,653	22,815	21,172

It is very probable that the Białowieża Forest District will not implement the maximum allowable cut laid down in the Amendment to the Forest Management Plan. It is not mandatory to fully implement the allowable cut laid down in the Forest Management Plan, as this cut is the maximum quantity of wood which the Forest District may harvest. Therefore, the allowable cut which had been set at too low a level made it impossible to carry out operations which were necessary to protect the area and human safety. In contrast, the decision to approve the Amendment to the Forest Management Plan for the Białowieża Forest District enabled the execution of active conservation measures in areas where it

was authorised and complied with the applicable principles of the conservation of the natural value of the property.

The data in the table above refer to the UNESCO zones, in accordance with stand descriptions.

Wood harvesting [m³] uncovered by the FMP in 2016.

Zone	Białowieża Forest District	Hajnówka Forest District	Browsk Forest District
I	-	-	-
II	-	-	-
III	2.08*	-	-
IV	-	-	<u>393*</u>

* in relation to the provisions of the Act of 10 April 2003 on the Special Rules of the Preparation and Implementation of Investment Projects to Build Public Roads (Official Journal of the Laws of 2015, Item 2031).

The demand for firewood in the individual Forest Districts (m³), the sales of firewood and the volume of the wood delivered and sold from the Żednia and Dojlidy Forest Districts (situated outside Białowieża Forest)

Forest District	Sales of firewood	Volume of the wood delivered and sold from the Żednia and Dojlidy Forest Districts
Białowieża	1,336.5m ³	193 m ³
Browsk	4,272.0 m ³	-
Hajnówka	4,818.5 m ³	330 m ³
Total	10,427 m ³	523 m ³

Have there been wood thefts and if so to what extent?

Forest District	Number of cases	Volume of stolen wood /m ³ /
Białowieża	1	0.65
Browsk	3	1.78
Hajnówka	1	2.14
Total	5	4.57

In 2016, no case of poaching was found in the Forest Districts within Białowieża Forest.

2) The real currently protected area – numbers and surface area (for each of the UNESCO zones)

- Forms of nature conservation,
- Conservation zones by species
- Reference stands / is there any form of nature conservation within their area?
- Nature monuments
- Wet habitats excluded for conservation purposes
- Stands older than 100 years

Zone II– partial conservation

Form of nature conservation	Białowieża Forest District		Hajnówka Forest District		Browsk Forest District		Total	
	Number	Ha	Number	ha	Number	Ha	Number	ha
Nature reserves	5	4,305.32	13	5,758.67	3	1,964.67	21	12,028.66
Species-specific conservation zones in nature reserves		73.91		130.73		128.03		332.67
Wetland habitats in nature reserves		2,661.49		3,411.83		1,838.7		7912.02
Post-Century (pioneering) habitats in nature reserves		181.16		107.07		16.55		304.78
100 years old		4,121.84		3,354.46		1,133.6		8,609.9

[Handwritten signature]

[Handwritten signature]

stands in nature reserves								
---------------------------------	--	--	--	--	--	--	--	--

Zone II includes nature reserves. The other forms of nature conservation listed in the table occur in nature reserves. In this context the real surface area of the above mentioned zone is limited to the surface area of the reserves. Two reserves: the *Natural Forests of Białowieża Forest* and the *Władysław Szafer Landscape Reserve* are situated in the area of two and three Forest Districts, respectively; for this reason, they were assigned to the Forest Districts with the largest surface area.

Zone III – partial conservation

Form of nature conservation	Białowieża Forest District	Hajnówka Forest District	Browsk Forest District	Total
	ha	ha	ha	ha
Species-specific conservation zones	494.62	646.97		3,444.66
Reference stands (resulting from Decision 52)	2,552.60	0	1,473.45	4,026.05
Wetland habitats	968.12	4,674.32	5,364.9	11,007.34
Post-Century (pioneering) habitats. Stands older than 60 years dominated by aspen and birch	30.99	384.18	43.67	458.84
Stands older than 100 years according to the FMP	3420.26	4,140.92	5,319.9	2,881.08

Zone III includes stands older 100 years (in accordance with the definition in the FMP), pioneering stands dominated by birch and aspen older than 60 years, as well as the protective zones around bird nests and lichens. The reference and wetland stands overlap on the above mentioned area.

Zone IV- an area of active conservation

Form of nature conservation	Białowieża Forest District	Hajnówka Forest District	Browsk Forest District	Total
	ha	ha	ha	ha
Species-specific conservation zones	1,584.68			1,584.68
Reference stands (resulting from Decision 52)	10.11			10.11
Wetland habitats	22.06	104.74		126.80
Post-Century (pioneering) habitats. Stands older than 60 years dominated by aspen and birch	7.36		105.38	112.74
Stands older than 100 years according to the FMP	590.33			590.33

Zone IV includes the other areas of the property, where there are reference stands, wet habitats and, fragmentarily, conservation zones, pioneering habitats, as well as stands older than 100 years (resulting from an incorrectly prepared map as part of the re-nomination application).

Throughout the property, there are dispersed nature monuments:

Handwritten signature/initials

Handwritten signature/initials

Forest District	Number of nature monuments
Białowieża	503
Browsk	83
Hajnówka	548
Total	1,134

The particular forms of nature conservation overlap on one another.

In the whole area of Białowieża Forest, the Białowieża Forest Natura 2000 Site PLC200004 and the Białowieża Forest Protected Landscape Area have been designated. In 8 nature reserves, there are conservation zones with an area of 332.67 ha. In 2 nature reserves, there are ecological sites with an area of 409.56 ha.

In the reference zone in the Białowieża Forest District there is the conservation zone of black stork and there are 18 conservation zones of *Lobaria pulmonaria*. Moreover, in the reference zone there are stands older than 100 years, stands in wetland habitats and pioneering stands.

3) Bark beetle outbreak

The surface area of spruce stands (with the share of spruce representing 10% or more, in accordance with the FMP) in the individual Forest Districts in ha, including stands older than 100 years.

Forest District	Surface area of spruce stands (with the share of spruce representing 10% or more, in accordance with the FMP)	Including stands older than 100 years /ha/	Surface area of dead stands, according to estimated data /ha/
Białowieża	10,254	5,353	3,500
Browsk	10,519	6,453	935
Hajnówka	14,608	6,780	700
Total	35,382	18,587	5,135

In order to give an exact surface area of dead stands, a detailed inventory must be carried out on the ground. The above data illustrate the extent of the impact of the bark beetle outbreak (the surface area of dead stands) and show the potential of the further development of this phenomenon.

The number and volume (m³) of trees infested by bark beetle – as of 31 October 2016.

Forest District	Number of spruce trees infested in 2016	Volume (m ³) of spruce trees infested in 2016	Number of spruce trees infested from 2012 to 31.10.2016	Volume (m ³) of infested spruce trees infested from 2012 to 31.10.2016
Białowieża	198,535	222,007	427,756	555,045
Browsk	91,028	113,739	199,799	243,743
Hajnówka	89,515	130,792	168,509	255,865
Total	379,078	466,538	796,064	1,054,653

It follows from the table above that in 2016 a very large number of newly infested spruce trees still continued to be found (about 40% of the trees infested in the period from 2012 to 2016 were identified exactly last year). This means that the bark beetle outbreak in Białowieża Forest has not declined yet.

4) The hydrological situation in 2016

The last 3 years (2014-16) were very diversified in terms of precipitation. 2014 was close to the long-term mean, but was followed by 2015 which was very unfavourable for the natural environment. The growing season of that year saw only 66% of the standard precipitation levels. 2016 was the most favourable year in terms of the precipitation totals in the summer and growing seasons. In the three years considered, in the spring season there was no rainfall deficit, whereas very low precipitation totals occurred in the second half of the growing season, which had a lesser effect on the course of the physiological processes in plants.

An analysis of different climate factors demonstrated that 2014 was neutral, whereas 2015 was very unfavourable for the natural environment of Białowieża Forest in terms of the weather conditions. In the growing season of 2016, the climate conditions improved in terms of humidity, which could have a significant effect on both the water regime in the Forest and the condition and stability of the habitats in the Forest.

In summing up the changes which took place over the last 3 years against the background of the variations analysed since 1948, the following climate change can be forecast for the next years:

- the thermal conditions will change towards an increase in the daily temperature and heat resources;
- the growing seasons will become longer;

Karol

Stella

- the thermal seasons of the year will begin sooner, there will be increasingly long summers and increasingly short winters;
- the growing temperatures of the winter seasons will have an increasing impact on the groundwater levels; particularly, in the spring season;
- the precipitation conditions will not change in a specific manner, but the next years may see drought periods of different duration;
- the air will be drier;
- the climate-related water balance will take on negative values.

5) Information on the transboundary cooperation in all fields

Given their situation on the border, the Forest Districts stay in constant contact with the manager of the Belarusian part of Białowieża Forest, i.e. the Belovezhskaya Pushcha National Park:

- on 11 February 2016, a delegation from the Belovezhskaya Pushcha National Park participated in a session of the Forest Promotion Complex of Białowieża Forest,
- a Polish study visit to the Belarusian part of Białowieża Forest as part of the training course of supervision engineers organised in 2016. In the course of the visit, its participants became acquainted with the issues related to tourists' access to the Forest and the management of forest ecosystems,
- the cooperation under the Platform for Cooperation for Sustainable Development of the Białowieża Forest Region,
- the participation in meetings concerning the Białowieża Forest World Heritage Site, including the visit by the representatives of the IUCN and the European Commission, as well as the meetings of the Steering Committee,
- the participation of all the stakeholders in the Scientific Conference on "Tourism in Valuable Natural Areas" organised by the Local Forestry Faculty of the Białystok University of Technology in Hajnówka.

6) Tourism pressure

The attractiveness of Białowieża Forest generates an enormous pressure on the environment. Given the free public access to the forests administered by the State Forests National Forest Holding, it is difficult to give the number of visitors. However, the estimated data indicate 140,000 persons a year.

In the Białowieża Forest District one of the facilities with paid entry is the educational path called the Trail of Royals Oaks. The statistical data on the tourist traffic on this track indicate that during 2015 it was used by 7,500 visitors, whereas in 2016 their number was almost 16,000.

Another important tourist facility is the narrow-gauge railway in the area of the Hajnówka Forest District. In 2016 there were 190 rides carrying about 20,000 persons.

A very large concentration of tourist traffic in a relatively small area, with its accumulation mainly in the spring and autumn seasons, exerts a large impact on its surroundings.

At present, organised tourism forms dominate – school excursions, integration events, symposiums, conferences and training courses, coupled with tourist attractions. Tourism of this type takes place in a controlled manner on the designated tourist trails, educational track and in designated places with attractions for tourists. Nevertheless, the individual tourism focused on nature and birds is just as popular. In this case, tourists move outside the designated trails to find their “curios”.

In order to ensure public safety, the field staff of the Forest Districts control on an ongoing basis the condition of trails and eliminate any threats.

In 2016, there were 51 cases of illegal vehicle entry into the forest (including 28 in the Białowieża Forest District, 15 in the Browsk Forest District and 8 in the Hajnówka Forest District).

In 2016, 634 m³ of waste was removed as part of the action taken by State Forests to reduce the impact of the tourism pressure in the form of waste in the forest. The Forest Districts have the tourist infrastructure indicated in the table below.

FOREST DISTRICT	TOURISTS TRAILS IN THE AREAS OF STATE FORESTS					
	Walking	Cycling	On horseback	Cross-country skiing	Nordic walking	Other
	km	km	km	km	km	km
Białowieża	81	23	0	0	53	0
Browsk	130.50	70	0	20	40.20	39
Hajnówka	60.10	47.60	0	0	38.30	0
Total	271.6	140.6		20	131.5	39

Other in Browsk – educational tracks.

Forest District	Forest-based parking lots		Vehicle stopping sites	
	Number of lots	Number of places	Number of sites	Number of places
Białowieża	2	117	1	8

Browsk	1	20	2	30
Hajnówka	2	90	0	0
Total	5	227	3	38

Along all the public roads, tourist trails and educational tracks and around vehicle stopping sites, ongoing works are carried out to ensure public safety. The trees which pose a threat to public safety in the nature reserves, in stands older than 100 years and in wet habitats are felled and left on-site to allow their natural decomposition. In 2016 (as of 26.10.2016), in order to ensure public safety, the following number of trees were felled and left on-site to allow their natural decomposition:

Forest District	Number of trees were felled and left on-site to allow their natural decomposition in 2016
Białowieża	3,279
Browsk	4,100
Hajnówka	3,504
Total	10,883

The Hajnówka introduced a **periodic ban on entry into the forest** (the Order No. 16/2016 of 29 April 2016). The ban applied from 01.05.2016 to 31.12.2016. It covered the forests which suffered from a massive dieback of trees and stands as a result of the bark beetle outbreak and prolonged drought, with a large number of dead trees posing a real threat to human health, life and property. The area under the entry ban is marked with boards carrying the “No Entry” notice. This applies to the green and yellow tourist trails.

In the Białowieża Forest District, given the accumulation of potentially dangerous trees and the need to fell them, on 1 November 2016 a **periodic ban on entry into the forest** was introduced, to apply in sections of 3 tourist trails: the green, black and blue ones.

The study presented below justifies the removal of trees which pose a danger along roads and other places of human sojourn (its author is Dr. W. Danielewicz, Ph.D., Professor Extraordinary of the Poznań University of Life Sciences, as part of the expert study entitled “An update of the state of conservation of the W. Szafer Landscape Reserve in Białowieża Forest”, R. Paluch (Ed.), Forest Research Institute Białowieża, 2016).

The following arguments justify the removal, felling or possibly toppling in another manner of dead or dying trees along roads and in other places where people sojourn:

1. Such trees primarily pose a great danger for the life and health of persons who move on foot or in cars down the public road from Hajnówka to Białowieża. Given the situation of these trees in the closest vicinity of the road, there is a high risk that they may fall in a spontaneous, uncontrolled manner onto the intensely used road and this may cause accidents with tragic consequences.
2. Given the massive presence of dead wood, it is not feasible to precisely and costly monitor the statistical data on each tree individually (to analyse the condition of the inside and resilience of the tree using a resistograph or acoustic tomography and to assess the risk that the tree may fall using the method of *Arbeitsstelle für Baumstatik AfB*), in particular, since these statistical data undergo unpredictable and rapid changes caused by the ongoing process of disturbances in the stand structure, the large variability of the weather conditions and the violent nature of weather events which could be seen quite frequently in recent years.
3. Dead and dying spruce trees in the forest edge zone often have more strongly developed and lower situated crowns facing the road strip than those facing the other directions. This enhances the risk that whole trunks, their parts or boughs may be displaced, in accordance with the unilateral load on the trees, i.e. directly onto the road strip. Moreover, this risk increases in the situation of advanced degeneration of the root systems of old and dying spruce trees and the loss of their stable anchoring in soil.
4. As a preventive measure, it is recommended that dead and dying trees should be removed or toppled in another manner when they pose a danger in the zone situated outside of the road strip, with its width equal to the height of the tallest spruce trees. The tops of lying trunks should face the interior of the forest.
5. An analogous, recently enhanced risk is posed to human life or health by fallen or broken trees in areas open to visitors, e.g. tourist trails or education tracks. In these cases, the risk level has to be regularly controlled, since it may change at short intervals of time, for the reasons mentioned earlier.
6. The need to ensure the feeling of safety for the local community and tourists is an important justification for the principles of the protective operations adopted here in an emergency caused by a rapid and massive dieback of trees in the reserve, particularly at the places where human presence is officially allowed. It is one of the aspects which need to be taken into account when harmonising human views and attitudes with the whole of the nature conservation measures. The limitation of these places or the introduction of bans on entry where it used to be allowed or even recommended (e.g. tourist trails) may lead to prejudices or a negative perception of nature conservation.
7. Accidents caused by falling trunks or even thick boughs usually cause death or serious injury, often even when the victims take the usually recommended special precautions.

7) The education implemented by the Forest Districts. The number of participants, target groups, topics and types of classes

The Forest Districts implement the forest and nature education for the public. In light of the specificity of Białowieża Forest, the main target groups consist of the pupils and students of primary schools, gymnasiums and post-gymnasium schools, as well as students of different universities with a forest profile and those dealing with nature conservation and environmental engineering, also including foreign students. In turn, in 2016 the overwhelming majority of trainees consisted of foresters from the different regions of Poland and Europe who wished to become acquainted in person with the problem of stand dieback caused by an intensive bark beetle outbreak.

According to the data as of 31.12.2015, the different education forms delivered by the Forest Districts were attended by:

Forest District	Number of participants in classes
Białowieża	10,560
Browsk	13,570
Hajnówka	12,512
Total	27,682

Forest District	Number of educators	Other persons involved in forest education
Białowieża	3	8
Browsk	2	10
Hajnówka	3	33
Total	8	51

8) Cultural aspects:

The State Party of Poland attributes great significance to the participation of the local communities. They strongly underline their wish to be involved in the management of the property. Their involvement is reflected in a number of cultural and integrating traditions. These communities integrate with one another and with the property. Taking into account the centuries long participation of the local communities in forest management and nature conservation, in 2016 the State Programme for the Białowieża Forest as a UNESCO Cultural and Natural Heritage Site and a Natura 2000 Site Białowieża was adopted and approved by the Minister of the Environment and Director -General of State Forests.

Białowieża Forest is an outstanding example of traditional settlement and traditional forest use, representative of the region of the Polish, Lithuanian and Belarusian borderlands. It illustrates a human interaction with the natural environment, consisting in the moderate use of natural resources and sustainable development. Settling in the Białowieża Forest region, man used its resources to a very

limited extent. This was a kind of its use which enabled a relatively small human population to survive in these particularly difficult climate conditions. The Forest resources were not subject to intensive commercial trading; nor did they provide the basis for the development of industry which would have led to the destruction of these resources. Although short periods of intensive, indeed robber-like, wood extraction left a permanent trace in the Forest ecosystems, still, they never broke the continuity of its natural processes.

The area of Białowieża Forest has ample sites of material culture, which are remnants from the rich history of this part of Poland, where the influences and cultures of different nations interacted for centuries. Unfortunately, as a result of its turbulent history, particularly the national uprisings, wars and the transfers of the Forest between different parties, very many valuable monuments of architecture did not survive until the contemporary times (their prime example is the hunting palace of Tsar Nicholas II from 1894).

a) Archaeological sites

The largest group of archaeological sites in the area of Białowieża Forest consists of barrow cemeteries from the early medieval times. Excavation works have indicated that they include both skeleton and cremation burials. They are dated from the period from the 10th century to the mid-13th century and attributed to Ruthenian settlement.

According to scientists, the presence of 88 barrow sites with 542 barrows has been documented in the Polish part of Białowieża Forest. According to other sources, in the area of Białowieża Forest there are 30 barrow cemetery sites with 184 burials. The results of the inventory of the barrows carried out in 1996 on commission from the Regional Branch of the Monument Protection Service in Białystok are shown below:

Forest District	Number of sites	Number of barrows
Białowieża	22	85
Browsk	30	196
Hajnówka	5	130
Total	57	411

Handwritten signature

Handwritten signature

b) Cemeteries and national memorials:

The cemetery in Białowieża was established in the 2nd half of the 18th century. At present, it is ecumenical. The oldest graves preserved in the cemetery come from the 1860s. The older part of the cemetery is overgrown by trees.

The Forest Districts support the organisation of cultural events related to Białowieża Forest and its history. Every year an open-air concert is performed at the amphitheatre of the “Jagiellońskie” Forest Education Centre within the framework of the International Festival of the Hajnówka Days of Orthodox Church Music. In October 2016, an open-air painters’ workshop took place in which 12 artists from all over Poland participated. The workshop was crowned with an exhibition of works devoted to Białowieża Forest.

The project “Traditional forest bee-hive keeping to the rescue of wild bees in forests” – is implemented by the Browsk Forest District, together with three Forest Districts from other Forest complexes, with financial support from the Financial Mechanism of the European Economic Area 2009 – 2014 and the Forest Fund.

With assistance from experienced forest bee-hive keepers from Bashkiria in Russia, where forest bee-hive keeping is a profession continued over generations, with rich experience, forest bee-hives will be reproduced in the field to restore this old and beautiful tradition.

Practical vocational education

The State Foresters School in Białowieża was founded in 1929 and, subsequently, after World War Two it was re-established in 1951 as the Forestry Secondary Technical School in Białowieża. The number of students involved in the practical vocational education in the Białowieża Forest District was as follows:

- the school year 2015/2016 – 202 students
- the school year 2016/2017 – 193 students

9) The monitoring of the current state of the environment and nature by the field services of the Forest Districts / The Order of the Director of the Regional Directorate of State Forests in Białystok

The monitoring of the natural environment, in particular, sites covered by different forms of conservation, is part of the forest management which is carried out on an ongoing basis by the staff of the Forest Districts. The collected information is used to supplement the database on valuable natural

sites. The purpose of the monitoring is to gain the best possible knowledge of the natural resources in forests. Using the collected information, it is possible to effectively plan economic operations in a manner which does not pose a threat to the preservation of the natural riches of forests and to implement rational forest management. On the basis of the collected information on the natural environment, the impact of planned operations on the biodiversity of forests is analysed.

Every forest inspector is obliged to make nature observations related to the species-specific conservation of plants, animals and fungi. The forest inspector submits the information in the form of Nature Information Sheet to the Forest District on an ongoing basis, but at least once year, by 30 September, in accordance with the Forest Protection Instructions.

10) The research projects implemented in the areas managed by State Forests:

1) The nature inventory carried out by State Forests from April to July throughout Białowieża Forest (thus, including the three Forest Districts in the Forest and the Białowieża National Park). It consisted of six basic modules.

a) The analysis was performed on 1,440 circular areas (400 m² each), also designated on sites where usually access was not allowed. The following was implemented on each site: a phytosociological survey, i.e. a census of all the plants present there, measurements of trees (including dead ones), the determination of the carbon content in soil and research on the populations of carabids – insects whose presence is an excellent indicator of environmental quality.

b) The bird inventory of particularly valuable species: nine species, including e.g. black stork, lesser spotted eagle or three-toed woodpecker.

c) The insect inventory: on more than 700 plots, a search for the sites of important protected insect species (including e.g. *Cucujus cinnaberinus*, *Osmoderma barnabita* or *Boros schneideri*) and the Carabidae.

d) The herpetofauna inventory, i.e. the verification of the sites of two amphibian species: crested newt and the European fire-bellied toad.

e) The chiropterofauna inventory covered barbastelle;

f) The inventory of cultural heritage. Its purpose was to analyse the human activities in Białowieża Forest carried out over the centuries, involving a search for remnants of former settlements, cemeteries and other sites. In this field, the researchers applied both airborne laser scanning and also traditional archaeological works. This will make it possible to restore the history of Białowieża Forest and protect the found monuments.

The whole project is implemented by about two hundred persons, including mostly foresters from all over Poland, who are experts in the fields of botany, phytosociology, soil science or stand

measurements. They are assisted by scientists, including those from the Forest Research Institute, the Polish Academy of Science and nongovernmental organisations, including e.g. the Society for the Protection of Owls, as part of the research project “An assessment of the state of biodiversity in Białowieża Forest based on selected natural and cultural elements”.

- 2) Monitoring of air pollutants in Białowieża Forest – the Forest Research Institute.
- 3) “An analysis of the origin of common spruce in the Białowieża, Browsk and Hajnówka Forest Districts” – the Institute of Dendrology of the Polish Academy of Sciences in Kórnik.

Investment projects on the property implemented by:

1) the Białowieża National Park

The Educational Pavilion at the European Bison Demonstration Reserve of the Białowieża National Park

The European Bison Demonstration Reserve of the Białowieża National Park is an exceptional facility designed to provide comprehensive and holistic knowledge of the European bison, the symbol of the strength and, at the same time, the fragility of nature.

The facility will play the role of the main gateway to the European Bison Demonstration Reserve. It will house: exhibition rooms on biology, ecology and history of the restitution of the European bison; a small cinema room with about 40 seats, toilets for visitors, resting places for visitors and social and technical rooms. The facility is expected to be commissioned in June 2017. The building is expected to operate as a passive one, involving minimum energy consumption, its compact solid prevents heat losses, its large glass-covered planes facing the south help absorb solar energy and most of its cubic space facing the north is hidden underground.

2) The State Forests National Forest Holding

Together with the Browsk Forest District, the Białowieża Forest District has planned the implementation of a linear investment project consisting in the reconstruction of the “Narewowska” forest road, accessible to public traffic. The “Narewowska” forest road runs from the Białowieża – Hajnówka regional road No. 689 to the village of Janowo in the Commune of Narewka. It is the main tourist route for both car traffic and cycling. The route of the Green Velo Eastern Cycle Trail runs along it. The reconstruction of the forest road will consist in improving its construction and paving it with a cold mineral and emulsion mixture within the existing road strip to ensure better exploitation conditions. The purpose of the implementation of the investment project is to adapt the technical parameters of the road to the recreation and tourism traffic. The aim of the replacement of the road surface is to improve the quality of the use of the road, mainly by hiking and cycling tourists. There is no plan to expand the road strip or to build roadsides. The speed limit of 30 – 40 km/h will also be kept.

The investment projects implemented in the operating area of the Hajnówka Forest District:



- the modernisation of the tourist open-walled shelter at Topiło
- the modernisation of the tourist open-walled shelter at Postołowo
- the reconstruction of the Łozice-Topiło road
- the modernisation of the Educational Centre at Topiło
- the modernisation of part of the rail tracks from Hajnówka to Topiło
- the modernisation of the narrow-gauge rail rolling stock
- the modernisation of the educational footbridge in the Czerlonka Forest Sub-District.

The investment projects planned in the area of the Hajnówka Forest District:

- the construction of a fire protection lookout point in the Czerlonka Forest Sub-District,
- the reconstruction of the bridge on the Leśna River.

II. The state of conservation of the Belarusian part of the Białowieża Forest UNESCO World Heritage Site, prepared by the State Party of Belarus

The surface area of the Belarusian part of the Białowieża Forest World Heritage Site is 82,306 ha.

In 2016, legislative amendments were adopted concerning the conservation of the Belovezhskaya Pushcha National Park, including the territory which is part of the World Heritage Site: involving changes in the surface area and location of the functional zones of the National Park, in particular the protective areas outside the boundaries of the conservation zone. In 2016, legislation provided for the launch of measures to combat aggressive alien species and projects to restore the disturbed hydrological regime.

In 2016, in the territory of the World Heritage Site measures were taken to restore the water regime in disturbed forest areas: 17 weirs were built on forest-based drainage canals and works were begun to restore the hydrological regime on drained lowland marsh Dikij Nikor with a surface area of 1,100 hectares.

In 2016, new Management plan was completed for the Belovezhskaya Pushcha National Park for the period of 2016-2020.

In accordance with the changes introduced by the Regulation No. 59 which entered into effect on 01.01.2016, the territory of the World Heritage Site is divided into functional zones in the following way:

The strict protection zone – 58,178 ha (70.7% of the territory of the World Heritage Site), the regulated use zone – 22,176 ha (26.9% of the territory of the World Heritage Site), the recreation zone – 1,734 ha (2.1% of the territory of the World Heritage Site) and the economic zone – 2,152 ha (2.6% of the territory of the World Heritage Site).

The following restrictions were imposed on economic activities in the areas of the functional zones where the strict conservation regime does not apply:

A complete ban on any felling – 8,496.6 ha (10.3% of the territory of the World Heritage Site);

A ban on any type of felling, with the exception of uniform sanitary cuttings in the case where stands are dead – 3,713.2 ha (4.5% of the territory of the World Heritage Site);

A ban on any type of felling, with the exception of measures to protect rare plant species – 64.9 ha (0.1% of the territory of the World Heritage Site);

A ban on any type of felling in the period from 1 March to 30 August – 1,995.4 ha (2.4% of the territory of the World Heritage Site).

The surface area of the conservation zone of the World Heritage Site where any type of felling has been banned by statute is 66,673.6 ha (81.0%); including the areas where a ban has been imposed on any type of felling, with the exception of uniform sanitary cuttings in the case where stands are dead, this surface area is 70,386.8 ha (85.5%).

A ban on the implementation of any measures to control the abundance of animals applied to an area of 60,957.8 ha (74.1% of the territory of the World Heritage Site).

Forest management operations in the territory of the World Heritage Site:

Periodic fellings of 27,853 m³ in area of 1,092.6 ha, including selective sanitary cuttings (to remove bark beetle-infested spruce stands) of 21,802 m³ in area of 915.4 ha.

The extent of the use of natural areas in the Belarusian part of the Forest World Heritage Site in 2016:

Type of cuttings:	ha	m ³
Periodic	1,092.62	27,853
Selective sanitary cutting	915.36	21,802
Cutting to improve light penetration	5.5	36
Thinning	5.3	210
Cutting for passage	146.66	5,613
Cleaning	19.8	192
Reconstruction cutting		
Other cuttings	581.1	7,779
Cutting of section-based clearances	10.28	262
Cleaning of section-based clearances	149.84	2,709
Cutting of single and dangerous trees	83.9	438
Uniform sanitary cutting	1.62	222
Removal of trees and shrubs along a motor road in a separated strip	4	338
Removal of lying trees, branches etc.	328.1	3,528
Removal of dangerous trees along power transmission lines	3.36	282

The operations to clean section-based clearances and to remove dangerous trees are carried out throughout the territory of the World Heritage Site, while leaving on-site trees in the conservation zone and the segments under a special conservation regime.

In 2016, there were no fire and windfall in the territory of the World Heritage Site.

Data on the recreation load in the territory of the World Heritage Site: 300,000 visitors to the National Park in 2016, but most of them visited the Natural Museum and animal enclosures which are situated in the protective zone of the World Heritage Site. The number of visitors on walking and cycling tourist trails in 2016 is estimated at 25,000.

In accordance with the approved thematic plan of scientific research in 2016, studies were carried out on “Scientific support for activities in the field of nature conservation and permanent management of the Białowieża Forest resources” (2016-2020), according to which actions are taken in the following ten chapters:

- Research on the singularities of the succession and demutation processes in forest formations with different regimes for the conservation of natural complexes;
- An assessment of the current condition and long-term dynamics of wild ungulates, including the European bison population of Białowieża Forest;
- Research on the species-specific biodiversity and correctness of the structural organisation of concentrations of tree hollow and nest-based birds in the forest ecosystems of Białowieża Forest;
- The identification of the impact of economic activity in the area of Białowieża Forest on the population of hard-winged insects entered into the Red Data Book of the Republic of Belarus;
- Research on the phytopathological condition of stands and an assessment of the succession processes in rare formations (ash, maple and lime-trees);
- The implementation of an inventory, the preparation of an expansion forecast and the elaboration of measures to combat invasive plant and animal species in the area of the National Park;
- The implementation of an inventory and an assessment of the condition and the identification of the factors which determine the dynamics of oligotrophic pine phytocenoses;
- The implementation of an inventory and an assessment of the condition of the microflora in Białowieża Forest;
- An ecosystem-based analysis of the spread of indicator species in relation to the dynamics of the boundaries of the protective zone;
- The dynamics of the processes and phenomena in the natural complexes in Białowieża Forest (The nature chronicle [Latopis]).

3. In conformity with Paragraph 172 of the *Operational Guidelines*, describe any potential major restorations, alterations and/or new construction(s) intended within the property, the buffer



zone(s) and/or corridors or other areas, where such developments may affect the Outstanding Universal Value of the property, including authenticity and integrity.

Not applicable.

C. Public access to the state of conservation report

[Note: this report will be uploaded for public access on the World Heritage Centre's State of Conservation Information System (<http://whc.unesco.org/en/soc>). Should your State Party request that the full report should not be uploaded, only the 1-page executive summary provided in point 1 above should be uploaded for public access.]

D. Signature of the Authorities

This report has been signed in the English version. Only the English version is authentic.



Igor Kachanovskiy

**Deputy Minister of Natural Resources
and Environmental Protection of the
Republic of Belarus**



Andrzej Konieczny

**Podsekretarz Stanu
w Ministerstwie Środowiska
Rzeczypospolitej Polskiej**

Kamieniuki, Republic of Belarus, 19 January 2017

Summary of comments to the report of the IUCN Advisory Mission
Białowieża 4 – 8 June 2016

N o.	Reacting entity	IUCN report fragment (original version) which the comment pertains to	Comment content
1	General Directorate of The State Forests	page 6, paragraph 2.3: „...even today, in the Białowieża Forest District (12 585.3 ha), about a quarter of the Polish share of the WH Site where the debate lies, is managed by the state forest service, National Forest Holding "State Forests" (SF) on the basis of a Forest Management Plan defined for 10 years and approved by the MoE...”	Entries in the aforementioned fragments can be confusing for persons reading the report. It should be clarified that the entire area of the Białowieża Forest District is managed by the National Forest Holding "State Forests" (SF), similarly to the other two forest districts – Browsk and Hajnówka. In addition, the total area managed by SF covers more than 82% of the area of the Polish part of the World Heritage property "Białowieża Forest". In addition, given that the entire area of the Polish "Białowieża Forest" amounts to approx. 59,000 ha, the Białowieża Forest District takes up approx. 20% of the Polish part of the WH property, i.e. 1/5, and not 1/4, as noted in report.
2 3		page 6, section 2.3: “...At the end of 2015, over than 96% of the logging limit fixed at around 500 000 m ³ for the three districts of the Białowieża Forest, were reached....” Page 7, section 3.2: “...the cause of the outbreak in	The cited numbers are incorrect – 96% relates to the implementation of the FMP only for the Białowieża Forest District. In the case of Białowieża Forest districts (Białowieża, Hajnówka and Browsk) total implementation at the end of 2015 was around 53%, and not 96%, as stated in the report. The total harvest limit for the three Białowieża Forest districts, before approving the addendum for the Białowieża Forest District, amounted to approx. 470,000 m ³ , and not approx. 500,000 m ³ , as indicated in the report. The presence of spruce in the forest is largely natural. It is a natural component of stands in almost all types of forest stands, but its role varies in individual types of stands. <i>In</i> the case of two forest complexes, for example, <i>Sphagno girgensohnii-Piceetum</i> , (Lowland subboreal spruce forests – Natura 2000 priority habitat), its role is by far a dominant one. Its recession due to the gradation of bark beetle transforms this plant

		<p>this particular case and its scale can be seen as anthropogenic and resulting in part from forest management practices undertaken to date which favoured production of soft wood lumber, mostly spruce trees, including through artificial plantations...”</p>	<p>community in a significant way. Spruce is also an important component of stands that are considered to be of particular value to the property, that is, old stands, along with their rapid breakdown we lose the ecological niches of many valuable species.</p>
4		<p>Page 8, section 3.2 „...show that the risk of fire has been relatively low to date in the context of the Białowieża Forest and that it is not currently a matter of concern...”</p>	<p>It should be noted that with the increase in the quantity of combustible material, in this case, vast amounts of dead trees, and especially brushwood, spruce branches and grass (small-reed), this risk increases significantly – based on studies performed by the Forest Research Institute's (IBL) Forest Fire Protection Laboratory.</p>
5		<p>Page 8, fig. 2</p>	<p>The authors of the report (citing Greenpeace) provided the number of fires in individual years based on an expert opinion entitled "<i>The impact of the amount of dead wood in the Białowieża Forest on the fire hazard and the risk to people</i>" developed in 2015 by the Forest Research Institute. However, the data concerning the amount of harvested timber [m³] from infected spruces in the Białowieża Forest are incorrect, e.g. <i>in</i> the years 2013-15 a total of 87,386,000 m³ of wood was removed, and not 480,000 m³, as indicated in fig. 2. The authors' inference about the fire hazard while taking into account only two factors — the number of fires and sanitary cuts is unwarranted. The dynamic and uncontrolled development of bark beetle's gradation, a rapid increase in the amount of dead wood, and climate change in recent years indicate that the risk is very high. The analysis and inference on fire hazard in the Białowieża Forest should also include a number of other factors – which have been made in the aforementioned study.</p>

6		<p>Page 8, section 3.2“... <i>the detailed location of the areas dedicated to afforestation (12 583.30 ha) in the decision of 25 January 2016</i>: the amendments to the Forest Management Plan lack details on the proposed restoration measures and their scope and location.</p>	<p>The error relates to the date of the decision approving the annex to the FMP for the period 2012-2021 for the Białowieża Forest District. The author was probably referring to a decision of 25 March 2016.</p> <p>It should be explained, or clarified, that the decision of the Minister of the Environment does not provide detailed data on the measures proposed neither in terms of restoration, nor their scope and location. The area of the restoration measures set out in the annex to the FMP results from current forestry needs arising from the stands' condition. Details relating to the implementation of restoration measures derive from the rules in force in State Forests relating to forest management, as well as other principles and guidelines.</p>
7		<p>Page 10, paragraph 4.1 “...<i>definition of the concepts of "sanitary cuttings" and "safety measures"</i>: clear technical guidelines should be established for "<i>sanitary</i>" cuttings and "<i>safety measures</i>", detailing when, where and how those measures can be decided and then implemented; those guidelines should be</p>	<p>These concepts are defined in the State Forest's internal instructions (Principles of Silviculture, Forest Protection Manual), and must be consistent with the existing laws governing the State Forests. The obligation to care for the condition of the forest, universal protection and continuous maintenance of forests also derive from the Forest Act (Article 8, 9, 10, 35 of the Forest Act). It cannot be negotiated with stakeholders.</p>

		established by a working group involving all types of stakeholders...”	
8		<p>Page 11, section 4.3 <i>“Surprisingly, little was said about the importance of the tourism sector in the WH property, and most of the local officials stated that the village of Białowieża reaps most of the benefits. Apparently, the SF does not see foresters playing a significant role in promoting and managing visitors in State forests, including the forest within the boundaries of the buffer zone of the WH property; at the same time, however, the SF staff repeatedly emphasized during the discussions with the experts, its legal obligations concerning visitor/user safety;”</i></p>	<p>The statements made in the cited paragraph regarding the role of foresters in promoting and managing visits are incorrect. State Forests are actively involved in making forests available for tourism and recreation. Education about forests and nature, tourism, recreation, and making the forest available constitute non-productive forest functions, very important in SF's operation. The aforementioned services are provided to the society free of charge. The Białowieża Forest districts play a significant role in the promotion of tourism and environmental education and the lack of interest in these activities is not true. Only in the Browsk Forest District there were 626 activities related to environmental education conducted in 2016, attended by 13,570 people from different regions of Poland. There are many tourist facilities, trails, and sites for bonfires in the forest district. There is an aquatic trail along the Narewka River, used by canoeists, within the Browsk Forest District. The network of educational trails totals 36 km, 130 km of PTTK hiking trails, 20 car parks for vehicles, 4 bonfire sheds. A trail along treetops is already designed. Tourism and education is included in the operation of the Białowieża Forest districts.</p>
9		<p>Page 12, section 4.4: “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.”</p>	<p>The main reason for the conflict are conflicting interests. Environmental organizations have set themselves the goal, which they do not hide, of creating a national park in the entire Białowieża Forest and, in the case of an inability to extend the Białowieża National Park, to block any forest management. Representatives of the SF will actively participate in the process of creating a management plan having in mind that it will be a very difficult task to develop a document acceptable by all parties in such an atmosphere of conflict.</p>

10		Page 12, section 4.4: Forest management tools/measures that respect and facilitate the ongoing natural biological and ecological processes... [...]and facilitate the recovery of the forest towards a more natural state of conservation.”:	<p>This statement fits perfectly in the actions proposed by the foresters.</p> <p>Renaturalisation of the stand in the oak-hornbeam forest could be done by reducing the share of spruce in the stands carried out in conjunction with limiting the effects of the bark beetle's gradation. In accordance with the opinion written by Professor Jan Matuszkiewicz, leaving large amounts of dead spruce trunks (standing and lying) in oak-hornbeam habitats (e.g. as a result of beetle gradation) is not justified by natural reasons. The supply of dead wood should be compatible with the natural (optimum) combination of living stands, because an excess of decomposing coniferous wood will be a factor in changing soil conditions and probably also biocenotic ones. Therefore, it should be considered hazardous to leave large amounts of dead spruce wood in habitats different than typical spruce stands (spruce wood on peat, mixed oak-spruce forest).</p>
11	Białowieża Municipal Council	Ad. section 1 "Background of the Mission"	<p>The mission report contains, in our understanding, a number of inaccuracies, that should be made clear before the experts' findings affect the functioning of the WH property. The authors state that introducing amendments to the FMP for the Białowieża Forest Districts aims to substantially increase fellings allowed in the area of the Białowieża Forest. The statement should be considered false and removed.</p>

12	Białowieża Municipal Council	Ad. section 2 "Current context" The World Heritage Committee has adopted the statement of its Outstanding Universal OUV, which, among other attributes, recognizes "the scale of its old growth forests, which include extensive undisturbed areas where natural processes are ongoing. A consequence is the richness in dead wood, standing and on the ground, and consequently a high diversity of fungi and saproxylic invertebrates".	Prof. Hilszczański seems to have the latest results of the inventory carried out in the Białowieża Primeval Forest. The work entitled "Saproxylic beetles of the Białowieża Forest and the particular role of the bark beetle" Hajnówka, 2016 reads, inter alia: "Also an excess of dead spruce trees is not conducive to the development of biodiversity. The amount of dead wood is not the most important determining factor for the diversity of saproxylic insects. (-) Dead spruces are also not preferred, for example, by species considered to indicate good condition of environments related to dead wood... While the presence of bark beetle infestations affect the diversity of stand structures and improve the conditions for development of many organisms, large-scale gradations of bark beetles (what we are dealing with now in the Białowieża Forest) may in the long run bring negative effects resulting from the drastic environmental changes."
13	Białowieża Municipal Council	Ad. section 2.2 "The management of the WH property" Table 1 shows the zones and the main ways of use and types of activities for each of the defined areas.	We report observations relating to the Partial protection zones: 1 – prohibited logging and hunting, and Partial protection 2 – prohibited logging. In the Partial protection 1 and Partial protection 2 zones there is no allowed sanitary cutting. We believe that both the division of zones and their use should be subject to consultations, as they apply to the vital interests of the local community.
14	Białowieża Municipal Council	Ad. section 2.3 "Forest legislation and management"	The Chapter Forest legislation and management includes an argument about ensuring the integrity of natural processes and maintaining the scale of the old growth forest in the Białowieża Forest. A few sentences earlier it was stressed that until recently harvesting was the main economic activity, and despite it, this valuable natural property has retained its unique qualities included in criterion IX and X. Therefore, forest management is not a threat to those values. At the same time Mission experts disregard the destructive effects of the bark beetle in relation to spruce old-growth, which virtually no longer exists in the Forest.

15	Białowieża Municipal Council	Ad. section 3.2 "On the bark beetle outbreak"	<p>Previous gradations of the bark beetle were effectively reduced by responsible and systematic actions of forest services in almost the entire area of the Białowieża Forest, which is managed by the forest districts. Abandoning this solution resulted in today's serious disruptions. For more than 100 years, human activities have been targeted at the protection of the forest, both in the name of mankind and its own value.</p> <p>Today's actions of environmental organizations are trying to show that only they guarantee the maintenance of this precious area – without respecting those who protected this area earlier.</p> <p>The Mission experts' search for the definition of "sanitary cuts" or other terms is not appropriate, since these terms and definitions are well described in the Polish law on forestry.</p>
16	Białowieża Municipal Council	Ad. section 4 "Conclusions and recommendations"	<p>In our view, it is inappropriate to create another integrated management plan for the Białowieża Forest. One should indicate documents – possibly most complete studies, already empowered legally and supplement them with information about the World Heritage property. The Białowieża National Park and the State Forests have such documents. Due to doubts relating to the terms laid down in the Polish forest law, one should change the ranges of individual zones on a map so that areas covered by special protection do not extend beyond the range of the National Park and nature reserves. Only areas protected by Polish environmental protection law should be included (and not in their entirety) in zones I and II (strict protection and partial protection I).</p>
17	Białowieża Municipal Council	Ad. section 4.1 "Legal framework"	<p>A fire protection plan must be created by experts in this field. They should only be provided with complete information.</p> <p>In addition to fire protection of the World Heritage property and tourists visiting the WH Property, one should ensure the safety of the local population living in settlements in forest clearings – exposed to particular danger in case of forest fire. Recent experiences with sky lanterns launched in the direction of the Forest or flaming torches discarded carelessly by tourists travelling by carriages or sleigh additionally cause serious risk of fire.</p>

18	Białowieża Municipal Council	Ad. section 4.2 "Governance"	<p>In conjunction with our participation in the Mission of IUCN experts to the World Heritage property of Białowieża Forest on 4-8 June 2016, we decided to take a position related to the participation of local governments in decisions concerning the residents and associated with the protection status and threats to the Białowieża Forest.</p> <p>Considering that the local communities are one of the essential bases of a democratic system, and the right of citizens to participate in the management of public affairs is one of the democratic principles of this system — we expect the law to be implemented directly on the local level.</p> <p>When in 2014 Poland and Belarus's joint proposal was been submitted, to protect the entire Białowieża Forest under the UNESCO Convention — no one asked local governments surrounding the Białowieża Forest for their agreement to this, and the resulting restrictions and loss of benefits affecting nearby residents. There were no public consultations proposing to protect the managed part of the Forest.</p> <p>The Białowieża Forest cross-border area, from June 23, 2014, covered an area of more than 308,000 ha on both sides of the border, including the buffer zone. The World Heritage property was expanded mainly on the Polish side from 5,065 ha to 59,576.09 ha.</p> <p>The local authorities are responsible for public affairs because they are closest to the citizens. Decision taken by the Committee of the Convention for the Restoration of the UNESCO World Cultural and Natural Heritage concerning the Białowieża Forest World Heritage Property in the managed part of the Forest does not respect the rights of local governments and residents arising from Article 5 of the Constitution of the Republic of Poland, Article 10 the Law on Protection of Nature and Article 3 of the European Charter of Local Self-Government.</p> <p>Białowieża Forest is the property of the Polish Treasury, and in our country, Polish law applies in this area, such as the Nature Protection Act or the Act on Forests. The Report does not mention Polish legislation. We would like to know why? It also seems beyond the competence of the IUCN experts to determine the degree of communication between stakeholders. There are virtually no effective mechanisms to ensure the involvement of local communities, non-governmental organizations, the scientific community and other key stakeholders.</p>
----	------------------------------	------------------------------	--

19	Białowieża Municipal Council	<p>Ad. section 4.3 "Socio-economic issues"</p> <p>Experts have wrongly interpreted the problem of purchasing firewood. There was no reported shortage of wood in 2016 — but the total lack of any possibility for purchasing due to the current ban on such sales in the Białowieża Forest District. It was not about cheap wood. In Białowieża wood has never been cheap.</p> <p>Specific data on the volume of firewood needs for the residents of the Białowieża Municipality — which amount to 10 thousand cubic meters per year – were presented during a meeting with the local governments.</p> <p>Local authorities have sufficient capacity to prepare proposals and raise funds. However, they lack the funds for their own contributions to the above. For example, they lost hundreds of thousands of zlotys of revenue from the forest tax as a result of the continuous reduction of the surface of managed forests and the creation of protected areas. Local authorities need</p>	<p>The local community has been developing citizens' awareness on the eastern border of Poland for generations, as well as the awareness of the value of the Białowieża Forest. It could share its knowledge and experience with many who want to respect the experience and centuries-old tradition maintained in many forest settlements. There is no need to teach us respect for our fatherland, and – as Adam Mickiewicz wrote in the national epic poem Pan Tadeusz – to our homely trees.</p> <p>There would be nothing to protect if not for the hard work of the local population. The hands of Polish foresters developed this priceless national treasure, which today is so irrevocably undermined. The Forest dies without human intervention. Active protection, in the belief of the overwhelming majority of the local community, is the only effective course of action in the managed area of the Forest, and the local population knows its rights. Therefore, it takes great courage or lack of understanding to teach Polish people love for the "land of their childhood".</p>
----	------------------------------	---	--

		substantial funding to pursue infrastructure for the development of tourism at the least.	
--	--	---	--

20	Regional Directorate for Environmental Protection in Białystok	<p>The Regional Directorate for Environmental Protection in Białystok cannot agree with the position of the IUCN Advisory Mission carried out in June 2016 at the "Białowieża Forest" World Heritage property, included in the Mission Report. In particular, the statement that decisions on sanitary cuts in the Białowieża Forest property are taken by the National Forest Holding "State Forests" without consultation with other interested parties is false.</p>	<p>It should be clearly pointed out that the annex to the Forest Management Plan for the Białowieża Forest District underwent the strategic environmental assessment procedure carried out in accordance with the law on providing information: on the environment and its protection, public participation in environmental protection; on environmental impact assessment. In the assessment, it was concluded that the execution of the tasks envisioned in the annex to the Białowieża Forest District forest management plan will not adversely affect the species and habitats that are the subject of protection of the Białowieża Forest Natura 2000 area in any way. At the same time, it should be pointed out that in carrying out the aforementioned strategic environmental assessment, the document was subjected to consultation, during which all interested parties could submit their comments, proposals, and feedback on this document. Below is a detailed strategic environmental assessment procedure for the annex to the forest management plan for the Białowieża Forest District.</p> <p style="text-align: center;"><3.'</p> <p>On July 8, 2015, the Regional Director of Environmental Protection received a proposal from the Director of the Regional Directorate of State Forests in Białystok, ref: ZS.6005.9.2015 with a request for a waiver from conducting strategic environmental impact assessment for the developed amendment to the forest management plan for Białowieża Forest District effective between 01.01.2012 — 31.12.2021, approved by decision of the Minister of the Environment, ref. DL-lpn-611-31/40283/12 of 9 October 2012.</p> <p>By letter dated July 14, 2015, ref. URWPN.611.16.2015.AP, the Regional Director of Environmental Protection in Białystok reported that, on the basis of the Article 48 para. 3 of the Law on providing information about the environment and its protection, public participation in environmental protection and on environmental impact assessment of 3 October 2008. (Journal of Laws of 2013, item 1235 as amended), the Director of the Regional Directorate of State Forests in Białystok shall not refrain from conducting a strategic environmental impact assessment. The basis for such a position was the precautionary principle implemented from Community law to Polish law in Article 6(2) of the Act of 27 April 2001 Environmental Law: "He who undertakes an activity which may have a negative effect on the environment shall be obliged to prevent such an effect.</p> <p>He who undertakes an activity, the negative effect whereof on the environment has not been fully identified yet, shall be obliged, following the precautionary principle, to take all possible preventive measures". According to this provision, the authorisation of plans or projects that may potentially affect the environment or a Natura 2000 site should obtain a</p>
----	--	---	---

		<p>guarantee that there is no risk of significant negative environmental impacts. Therefore, any doubts in this regard must be interpreted to the benefit of the environment. In addition, in accordance with the case-law of the Court of Justice (judgments of 14 June 2007, ref.: C-127/02, paragraph 56 and 59, and of 13 December 2007, sign.: C-239/04, paragraph 20) the implementation of a plan or project may be granted only on condition that the competent national authorities ensure that the plan or project will not have any adverse effects on the land to which they relate. Withdrawal from conducting a strategic environmental assessment in this case could mean failure by the Regional Director of Environmental Protection in Białystok, to undertake the necessary actions in order to clarify all the circumstances necessary for deciding on the matter.</p> <p>In this case, there was a need to determine whether the increase in the harvest limit does not adversely affect the habitats and species which constitute objects of protection by the Białowieża Forest Natura 2000 site. For this reason, by order of 4 August 2015, ref.: URWPN.611.22.2015.AP, the Regional Director of Environmental Protection in Białystok has determined the scope and level of detail of the information required in the forecast of the environmental impact of the amendment to the forest management plan for the Białowieża Forest District.</p> <p>By letter of 6 November 2015 ref: ZS.6005.9.2015 the Director of the Regional Directorate of State Forests (RDSF) in Białystok, filed a submission to the Regional Directorate of Environmental Protection in Białystok requesting an opinion on the documentation concerning the drawing up of an amendment to the forest management plan, together with the forecast of the impact on the environment and Natura 2000 sites for the Białowieża Forest District. The application was accompanied by an expert opinion of the Bureau for Forest Management and Geodesy, Branch Office in Białystok, drawn up for the amendment to the forest management plan.</p> <p>By letter of 16 November 2015, ref: URWPN.611.38.2015.AP, the Regional Directorate of Environmental Protection in Białystok issued a negative opinion on the submitted document, justifying its position by formal deficiencies in the presented documentation.</p> <p>By letter of 10 December 2015, ref.: ZS.6005.9.2015, the RDSF in Białystok presented the complete documentation concerning the annex.</p> <p>By letter dated December 17, 2015, the Regional Director of Environmental Protection (RDEP) in Białystok issued a positive opinion on the documentation accompanying the annex to the forest management plan for the Białowieża Forest District, which increased the size of the harvest limit to 132,457 m³ (an amount resulting from the RDSF letter of 10 December 2015).</p>
--	--	---

			<p>By letter of 18 December 2015, the Director of the Regional Directorate of State Forests in Białystok requested an opinion on the documentation attached to the annex to the forest management plan for the Białowieża Forest District increasing the harvest limit to 317,894 m³ in accordance with the request of the Forest District Manager of the Białowieża Forest District.</p> <p>As a result of examining the documentation, together with the additions of: 5 and 12 January 2016, it was agreed that the entity developing the draft document has not demonstrated the lack of impact on the species and natural habitats protected under the Białowieża Forest Natura 2000 site. The Regional Director of Environmental Protection in Białystok on 18 January 2016 issued a negative opinion on the draft documentation to the annex to the forest management plan for Białowieża Forest District, which increases the harvest limit to 317,894 m³ together with the forecast on the impact on the environment.</p> <p>On February 9, 2016, the RDEP in Białystok received an application by the RDSF in Białystok requesting an opinion on documentation for the annex to the forest management plan for the Białowieża Forest District, increasing the size of the harvest limit to 188,000 m³.</p> <p>On 12 February, the Regional Director of Environmental Protection in Białystok, Poland issued a positive opinion for application by the Regional Directorate of State Forests in Białystok at the stage of strategic environmental impact assessment of the amendment to the forest management plan for the Białowieża Forest District, which increases the size of the harvest limit to 188,000 m³.</p> <p>In accordance with the request of the Regional Directorate of State Forests in Białystok, the development of an amendment to the forest management plan for Białowieża Forest District for the years 2012-2021 is caused by the necessity of the implementation of sanitary cuts in order to slow down the process of bark beetle gradation and stop the breakdown of stands. The annex developed to the plan mainly concerns the removal of infested spruce trees due to the on-going gradation of the spruce bark beetle.</p> <p>In accordance with the documents possessed by the RDEP, sanitary cuts scheduled in the annex will not be performed in nature reserves, wetland habitats and in conservation zones, which represents a total of 7,123 ha, i.e. 58% of the surface area of the Białowieża Forest District. Snag also will not be removed, with the exception of those that pose a risk to general safety. Harvesting of spruce infested by bark beetles will be carried out on an area of approximately 5,100 ha, which is approx. 8% of the surface area of the Natura 2000 site of Białowieża Forest. The works will not conflict with the provisions of the</p>
--	--	--	---

		<p>protection plan for the Białowieża Forest Natura 2000 site, and will not have a significant negative impact on the habitats and species, for which the site was established. No intermediate and final cuts are planned in more than 100-year-old stands. As described in the documentation in these stands only sanitary cuts of spruce infested dead trees, will be carried out. Snag will not be removed.</p> <p>A plan of conservation tasks for the Białowieża Forest Natura 2000 site was established by order of the Regional Director of Environmental Protection in Białystok of 6 November 2015. In accordance with the presented documentation, the measures envisaged for implementation on the basis of the annex are not inconsistent with the provisions of the conservation tasks plan for the Białowieża Forest Natura 2000 site and will have no effect on habitats and species for which the protection of the area was established. It should be noted that the forest management plan of the Białowieża Forest District and the plan's annex constitute a "management plan" 100% compatible with the Plan of Conservation Tasks for the Białowieża Forest Natura 2000 area. We wish to explain that the Plan of Conservation Tasks for the Białowieża Forest Natura 2000 area contains, among others, entries on the need to perform specific protective measures that have been moved to the Białowieża Forest District forest management plan.</p> <p>The Regional Director of Environmental Protection in Białystok, as supervisor of Natura 2000 sites, is responsible for the maintenance of a favourable conservation status over objects of protection of the area. Proper protection status means that:(1) the dynamics of the population of the species indicates that it is maintained in the long term as a biologically viable component of its natural habitats;(2) the natural range of the species does not decrease, and there is no reason to believe that it will decline in the foreseeable future;(3) there is and probably there will be a large enough surface of habitats necessary for long term conservation of the population. The performed strategic environmental impact assessment made it possible to make a valid and reliable assessment of the impact of the forest management plan's annex for the Białowieża Forest District on the natural habitats, species and their habitats, for which protection has been designated, the coherence of the Natura 2000 network, as well as other valuable items.</p> <p>The impact of the implementation of the annex on the habitats and species, for which the Białowieża Forest Natura 2000 site was designated was studied at every stage of the proceedings.</p> <p>At the same time, we wish to inform that in the course of strategic environmental assessment, based on the provisions set out in the Act of 3 October 2008 on the provision</p>
--	--	--

		<p>of information about the environment and its protection, public participation in environmental protection and on environmental impact assessment, public consultations lasting 21 days were started on 10 November 2015 the by RDSF in Bialystok. On 7 December 2015, a meeting summarizing the consultations was held in the Białowieża Forest District.</p> <p>It should also be noted that the development of the conservation tasks plan for the Białowieża Forest Natura 2000 area took 5 years. Such a long time given to the development of this document was related, among others, to public consultations with a view of reaching a compromise and reconciling the interests of all stakeholders of this precious area. The draft document was repeatedly subjected to consultation. Below is a detailed schedule of the works carried out in order to establish a conservation tasks plan for the Białowieża Forest Natura 2000.</p> <p>The draft plan for the area in question was developed between January and October of 2011. 14 October – 4 November 2011, the Białowieża National Park conducted the statutory 21-day public consultation of the conservation tasks plan. All comments and proposals submitted during the first consultations were considered.</p> <p>Due to the change of legal provisions concerning the development of conservation tasks plans for Natura 2000 sites (Ordinance of the Minister of the Environment of April 17, 2012.) changes had to be introduced to the draft Plan. In connection with the introduction of amendments to the draft plan, the RDEP in Białystok conducted second 21-day public consultations between 14 June and 05 July 2012. During the renewed public consultation, we received numerous comments that were considered.</p> <p>In connection with the need to ensure the consistency of the draft conservation plan for the Białowieża National Park, forest management plans for forest districts and draft tasks plan for the Białowieża Forest Natura 2000 site, the compliance of all the aforementioned documents was verified.</p> <p>Ordinance of the Minister of the Environment of 7 November 2014 set out the conservation plan for the Białowieża National Park, which contains the Białowieża Forest Natura 2000 site.</p> <p>In connection with the need to make changes in the draft conservation tasks plan (CTP), resulting from the need to ensure the CTP's cohesion with the draft conservation plan for the Białowieża National Park and the FMP for the forest districts within the Białowieża Forest, as well as resulting from the many comments submitted to the draft CTP in the years 2013-2015, third 21-day public consultation of the CTP were held. During the renewed public consultation, we received numerous comments that were considered.</p>
--	--	---

			By way of an order of the Regional Director of Environmental Protection in Białystok of 06.11.2015, the conservation tasks plan PLC 200004 for the Puszcza Białowieska Natura 200 site was established (Podlaskie province Official Journal of Laws of 2015, item 3600).
21	Regional Directorate for Environmental Protection in Białystok	After the analysis of the report of the IUCN Advisory Mission carried out in June 2016 at the World Heritage property "Białowieża Forest", it should be noted that in the opinion of the Regional Directorate of Environment Protection in Białystok it is necessary to revise the established protection zones and the ability to perform conservation measures related to the protection of valuable species and natural habitats in their borders as soon as possible.	The introduction of strict provisions that do not allow the harvesting of trees, e.g. in active protection zone I (nature reserves) raises big concerns. Some of the nature reserves in the Białowieża Forest has been created for the protection of butterflies (Olszanka Myśliszcze – 115 ha, Podcerkwa – 228 ha, Przewłoka – 73 ha). These areas require active protection in the form of uncovering the surface, and therefore harvesting. No derogation from the above prohibition, even in the form of measures arising from plans or conservation tasks, will lead to the disappearance of the main subject matter of protection, and will continue to conflict with the use specified for this World Heritage property. In addition, from 2015, a conservation tasks plan established by the Regional Director of Environmental Protection in Białystok remains in force for the area of Białowieża Forest (Podlaskie province Official Journal of Laws of 2015, item 3600). For the sake of subjects of protection typical of this area, the plan provides for protective measures assigned to the specific forest sub-compartments; it also indicates the entity responsible for their execution. And so, for example, for Galio-Carpinetum oak-hornbeam forests habitat (9170), the planned activities form a gradual, distributed in time reconstruction of the stands. For Luzulo-Fagetum beech forests habitat (9110), the measure involves removing the second layer of the stand. Similarly as above, all tasks for the protection and preservation of objects of Natura 2000 protection are incompatible with the way of use indicated for the given zone of the World Heritage property. It seems necessary to indicate a derogation from the general rule, i.e. the possibility of applying measures resulting from the aforementioned Act of local law (Białowieża Forest Conservation Tasks Plan).
22	Regional Directorate for Environmental Protection in Białystok	Public safety is another issue that has to be brought up. The District Manager of the Forest District has full responsibility for safety in the forest.	The increasing number of trees infested by beetles found along roads, large accumulation of trees on the forest floor poses a real threat to people travelling by roads and trails, as well as a fire risk. For each of the defined protection zones, one must add a derogation in the form of an ability to fell trees that constitute a safety hazard.
23	Prof. dr hab. Jacek Hilszczański Forest Research Institute (IBL)	Including the Białowieża Forest as a world natural heritage site according to criterion IX (natural processes) was not thoroughly analysed in	The first thing one should do when planning the inclusion of an area, where natural processes may be observed and protected is an analysis corresponding to the question: what should be the minimum size of such an area? This type of analysis has not been carried out, which the "Report..." does not mention.

		<p>terms of the effects of such a decision, which de facto imposes a ban on performing any treatments, including active protection treatments of species and habitats in most parts of the forest.</p>	<p>The minimum area that protects natural processes should provide a permanent presence in time, of internal recolonization sources for all natural elements that occur in a given area. The area should ensure functioning of factors shaping the environment (disruptions), allowing for permanent operation of the habitats and species in time and space (<i>Leroux, S. J., Schmiegelow, F. K. A., Lessard, R. B., & Cumming, S. G. (2007). Minimum dynamic reserves: A framework for determining reserve size in ecosystems structured by large disturbances. Biological Conservation, 138(3-4), 464-473).</i></p> <p>For example, in the area of boreal Canada, the minimum area, where it is "safe" to observe and protect natural processes amounts to 2 million hectares. This is the opinion expressed by IUCN experts reviewing the "Pimachiowin Aki" reserve with an area of 3.3 million ha, included on the World Heritage list on the basis of criterion (IX) during the UNESCO session in Istanbul. One ought to believe that in a climate zone in which the Białowieża Forest is located, a minimum area most likely is not much smaller. Even the entire area of the Białowieża Forest, including the Belarusian part (approximately 160,000 ha) is not enough to meet the requirements related to the protection of processes without the risk of losing biodiversity. Too small area of the Białowieża Forest in the context of protecting natural processes has also been observed for decades through the dieback of species and disappearance of habitats.</p>
24	Prof. dr hab. Jacek Hilszczański IBL	<p>What is interesting in the context of the protection of natural processes is the ability to perform procedures related to fire protection in all protection zones including strict protection zones.</p>	<p>Could it be, however, that natural disruption in the form of a fire could get out of control and destroy precious habitats and species? Such concerns are not expressed in relation to the gradation of the bark beetle, which is an endogenous disruption whose effects can be compared to fire from the point of view of ecological effects. Gradation effects, that is, the accumulation of large amounts of flammable material are also closely associated with the exogenous disturbance of fire(<i>Reilly, M. J., & Spies, T. A. (2016). Disturbance, tree mortality, and implications for contemporary regional forest change in the pacific northwest. Forest Ecology and Management, 374, 102-110).</i></p>
25	Prof. dr hab. Jacek Hilszczański IBL	<p>The claim that the cause of bark beetle gradation is found in forest management carried out</p>	<p>Suggesting anthropogenic sources of the gradation scale in the Białowieża Forest has no scientific justification. Gradations of bark beetles with equal intensity, as in monocultures of artificial origin and in much larger scale have been found and are found in the natural forests of North America(<i>Aukema, B. H., Carroll, A. L., Zhu, J., Raffa, K. F., Sickley, T. A.,</i></p>

		in the forest is at the very least – strange.	<i>& Taylor, S. W. (2006). Landscape level analysis of mountain pine beetle in British Columbia, Canada: Spatiotemporal development and spatial synchrony within the present outbreak. Ecography, 29(3), 427-441.).</i>
26	Dr hab. Bogdan Jaroszewicz Białowieża Geobotanical Station of Warsaw University	The report does not mention cases of decision making concerning the area's management without taking zoning into consideration. The reference zone established by decision of the Director-General of the State Forests was located in the active protection zone of the property (allowing harvesting) which prevented the forest district from harvesting for local needs.	Every decision concerning the management of the area of the property should be made on the basis of its zoning and assessed for its impact on local communities and the OUV.
27	Dr hab. Bogdan Jaroszewicz	Poor communication between interested parties indicated by the experts should be more strongly accentuated.	In many cases, this communication does not exist or different measures are being prepared in secret from other stakeholders and the society. Site managers: State Forests and the Białowieża National Park should ensure the transparency and participatory nature of the decision-making process concerning the property's management.
28	Dr hab. Bogdan Jaroszewicz	Poor communication with the public results, in my opinion, from the lack of information about the property and the lack of even a virtual, web, contact box to the entity managing the property.	The managing authorities of the property should be obliged by UNESCO to promote the fact that the Białowieża Forest is a world heritage site on their website, letterhead paper, etc. and create a website to allow interested persons/organisations/institutions contact with the widely-understood property manager.
29	Dr hab. Bogdan Jaroszewicz	In order to prevent shortages of wood for local market	

		mentioned in the Report, one must not only accurately estimate the demand for wood in the region of the Białowieża Forest (as recommended), but above all introduce a policy of selling all harvested material in the form of retail sales to the local market, with the exception of online sales systems (forest portal and e-wood) for the entire World Heritage property.	
30	Dr hab. Rafał Paluch Forest Research Institute (IBL) Natural Forests Department in Białowieża	Section 2.1, p. 10 ...recognizes <i>"the scale of its old growth forests, which include extensive undisturbed areas where natural processes are ongoing. A consequence is the richness in dead wood, standing and on the ground, and consequently a high diversity of fungi and saproxylic invertebrates"...</i>	This statement needs to be corrected. According to Prof. Sokołowski's studies, natural forests outside the BNP take up approx. 3000 ha.
31	Dr hab. Rafał Paluch IBL Natural Forests Department in Białowieża	Section 2.1, p. 11 <i>"the necessary elements to demonstrate the key aspects of processes that are essential for the long-term conservation of the ecosystems and the</i>	These criteria may cause conflict between passive and active protection.

		<i>biological diversity they contain" and those designated under criterion x "should contain habitats for maintaining the most diverse fauna and flora characteristics of the biogeographic province and ecosystems under consideration".</i>	
32	Dr hab. Rafał Paluch IBL	Table I. summarizes the legal regime of the main uses and activities regulated in each of the defined areas of the WH property and its buffer zone.	Vague division into protection zones, especially 3 and 4, who established them and on what basis?
33	Dr hab. Rafał Paluch IBL	Page 10, section 4.1 The experts consider that the requirements of the World Heritage Convention and the EU Habitats and Birds Directives are compatible with each other.	Here one should point out a significant inconsistency through analysis of sub-compartments where activities under CTP (conservation tasks plan) have been planned in the context of UNESCO protection zones. A lot of work, but it can be done with the help of forest districts and the RDEP.
34	Dr hab. Rafał Paluch IBL	Page 10, section 4.1 With regards to the requirements of the World Heritage	The two cited sentences from Section 4.1 contradict each other. We are supposed to protect Natura 2000 habitats, and at the same time use passive protection as much as possible.

		<p>Convention, the management and protection of the property should be aimed at preserving its OUV which specifically recognizes its <i>"substantially undisturbed nature"</i> and <i>"extensive old-growth forests"</i> whose preservation in the long-term would require minimizing any interventions.</p> <p>The whole Polish part of the WH property is encompassed within the boundaries of the NATURA 2000 Site, and a Plan of Protective Tasks for the Natura 2000 "Białowieża Forest" has been submitted with the nomination dossier. In each case, the Polish authorities have to implement specific management measures meeting those regulations. All legal management plans and programs covering the WH property should clearly ensure the maintenance of</p>	
--	--	--	--

		the OUV and sustain the conditions of its integrity in a proper way. Preparation of an Integrated Management Plan for the Polish part of the property should be used as way to review all existing management plans and harmonize through appropriate mechanisms defined for each of these designations;	
35	Dr hab. Rafał Paluch IBL	Page 11, section 4.2 “...looks to be more opened to environmentalists and the associated research community.	The scientific community is also divided and not everyone shares the views of environmentalists.
36	Lokalsi przeciwko wycinie Puszczy Białowieskiej Person representing the group: Joanna Lapińska ul. Wierobieja 12/2, 17-200 Hajnówka email: lapaspk@tlen.pl	General remarks	Białowieża Forest was included as a UNESCO World Heritage site due to the preserved ecological processes, the state and dynamics of ecosystems and habitats in its territory, relevant to the protection of biodiversity. The UNESCO site "Białowieża Forest" was established on the basis of natural criteria. Cultural values of the region, mentioned in the report, invoked by the representatives of the Ministry of the Environment, however important, cannot attest to the uniqueness of the Białowieża Forest. Despite long-running historical processes, when the local population lived in the area around the forest, the forest's exploitation was marginal. This area was protected by Polish rulers, later on by Russian tsars, and the local populace could only use the limited concessions for extensive exploitation of forest goods, mainly the implementation of the tasks set by the then rulers of the area. We agree with the opinion of the IUCN experts, who recognise that bark beetle attacks are a natural occurrence and contribute to the natural rebuilding of stands of artificially increased presence of coniferous species (mainly spruce). The arguments about

			<p>the "hornbeaming" of the forest, raised by some foresters, should not be considered as evidence of negative processes in the ecosystem — it is in fact a logical and natural consequence of the reduction in the number of spruce trees, especially in oak-hornbeam areas. By proposing the Białowieża Forest as a World Heritage site, Poland has committed itself to the protection of the forest in a way that respects natural processes. "The fight against the bark beetle" should not be the goal of the Ministry of the Environment and the foresters, because it would be a fight against natural process. In addition, the guidelines of the UNESCO site clearly indicate that active protection is not the proper instrument for the conservation of nature in the Białowieża Forest. State Forests, through the implementation of active protection according to their own conceptions, include methods used in commercial forests in protection, thereby reducing the naturalness of the UNESCO site. As representatives of the local community and in the interests of the welfare of the inhabitants of the region, we agree with the Report's accusation as to the poor communication and inadequate cooperation with the academia, environmental organisations and local communities or other potential stakeholders such as the commercial groups or tourist organisations. We believe that it is necessary to regulate and refine ways of management, communication, process consultation with all interested groups, because at the moment virtually the only those groups that can support the arguments presented by the Ministry of the Environment are allowed to speak up. The total elimination of the scientific communities from the discussion, which in the overwhelming majority condemned the policy conducted in relation to the Białowieża Forest since late 2015 deserves particular criticism, as well as manipulating local sentiments in order to conflict them with the academia and non-governmental organisations associated with environmental protection. We would also like to remind that the conflict about the Białowieża Forest has existed for decades and so far, neither the Ministry, nor the State Forests, nor the local governments have not made any efforts to increase social acceptance for the idea of protecting the Białowieża Forest. In relation to the criticism surrounding how poorly tourism development was addressed in the report under discussion, we remind you that all the strategic documents in the region (referred to briefly below) indicate the development of tourism based on the resources of the Białowieża Forest or other green areas of Podlasie as the main directions of the region's</p>
--	--	--	--

			<p>development. Within the framework of the activities for the development of tourism in terms of utilising the world-famous Białowieża Forest, one should also include Podlasie's cultural heritage and its promotion as a tourist attraction. It would allow to create a richer and more varied tourist offer, and at the same time, one could link resources for the development of the region and the development of tourism in the region with preserving the cultural heritage of the region. For example: the Podlaskie Province Development Strategy by 2020 shows ecotourism and other smart strategic specialties the region should develop in, based on the natural resources of the province, including the resources of the Białowieża Forest. At the level of administrative districts, the Hajnówka District Sustainable Development Strategy for the years 2015-2020 includes the potential of scientific and natural heritage for sustainable development (this is compatible with National Smart Specialisation) in its strategic purposes. Similar analysis is found in the Development Strategy of Hajnówka for 2016-2025, which points to the existing tourist potential of the city (especially in terms of nature, medical and active tourism) and the lack of current use of this potential. There is also a document called the Strategy for the Management and Promotion of Tourism in the Region of the Białowieża Forest, together with the development of two tourist products of the region, which has been developed in the framework of the implementation of the project "Cooperation Platform for the Sustainable Development of the Area of the Białowieża Forest" funded by the European Union under the European Regional Development Fund, and the Infrastructure and Environment Operational Programme. The issue of the demand for wood on the local market is located in the attached study prepared in 2012 by a team of environmental non-governmental organisations "Preferential access to wood from the Białowieża Forest for the local community. Analysis of certain legal conditions". The problem is firewood has been repeatedly tackled by the residents of the region and so far, it has not been resolved, despite the ministerial declarations.</p>
--	--	--	--

37	dr Anna Kujawa Institute for Agricultural and Forest Environment PAS Poznań, ul. Bukowska 19 e-mail: anna.kujawa@isrl.poznan.pl	General comments	<p>I consider the report presented by IUCN Experts to be accurate, clear and specific.</p> <p>2. It was rightly pointed out the report (Section 3.1), that the "Programme for the Białowieża Forest as a cultural and natural UNESCO-heritage and the area of the Natura 2000 network" does not contain appropriate, elaborate recommendations on the protection of natural values.</p> <p>3. The interpretation of the attacks of bark beetle as a biological process (Section 3.2 of the Report) is consistent with interpretations of many members of the scientific community (among others, the opinion of the PROP, KOP, an open letter to the Prime Minister, signed by university professors, faculty boards of the Silesian University and Wrocław University, the Scientific Council of the Białowieża National Park, the article by Wesołowski et. al. 2016 - http://forestbiology.org/articles/fb_02.htm, artykuł Bobiec et al. 2015 - http://www.polskiwilk.org.pl/download/PuszczaBialowieska_Swierki.pdf) and NGOs (among others, Greenpeace, Greenmind, Klub Przyrodników, Polskie Towarzystwo Etologiczne, PTOP „Salamandra”, OTOP, Pracownia na rzecz Wszystkich Istot, Stowarzyszenie dla Natury Wilk, WWF), opposing significant interference in this process.</p> <p>4. In accordance with the Report (Section 4.1) the recommended consistent, transparent program for the management and protection of the Białowieża Forest (UNESCO World Heritage site) should be developed with the participation of all stakeholders (SF administration, representatives of the Białowieża National Park, representatives of the local community, researchers reporting the willingness to cooperate and taking positions supporting the protection of the Forest, the representatives of environmental organizations involved in studying, documenting and protecting the Forest).</p> <p>5. In accordance with the Report (Section 4.2) an open platform for exchanging information between all stakeholders (see Section 3) should be created, and the cooperation of all stakeholders in the process of developing a plan for the management and protection of the heritage site should be ensured.</p>
----	---	------------------	---

			<p>6. State Forests (if the developed governance and protection model of the site still stipulates SF's administration in parts of the forest) could significantly improve education on ecological forestry (e.g. according to Barzdajna et. al. 1999) on the basis of measures for the protection of spontaneous processes in the Białowieża Forest,</p>
38	<p>prof. dr hab. Tomasz Wesołowski tomasz.wesolowski@ uwr.edu.pl</p>	<p>General remarks</p>	<p>I believe that the "Report" is accurate, it presents the situation in the Białowieża Forest on its merits, in a balanced way. My comments relate to the following issues:</p> <p>The report insufficiently highlights that all decisions concerning the management of the area of the World Heritage site, both at the macro level (forest management plans), and micro level (e.g. carrying out sanitary cuts at given locations) must be assessed in terms of their impact on the "Outstanding Universal Value" of the site before they are made, including the directory of restrictions (exemption) applicable in the different zones. The legitimacy of such actions should be judged by bodies independent from the institutions directly interested in carrying out the interference. Treatments could be made only after obtaining their positive opinion.</p> <p>Also poor communication between the parties involved was not sufficiently indicated in the Report. In reality, in many cases, there is no access to information; various activities are prepared by the Forest's management in secret from other stakeholders and society. Site managers: State Forests and Białowieża National Park should ensure the transparency of the decision-making process and allow the participation of other interested persons/institutions in the decision-making processes on the management of the Białowieża Forest.</p> <p>It is very important to create channels of communication, create an open platform for exchanging information between all stakeholders, as proposed in the report, launch a website of the Forest as a World Heritage site, provide contact address to the institution managing the site.</p> <p>Precise estimates of the local demand for firewood is a necessary condition but not sufficient to solve the problem of the availability of wood for the residents of the Białowieża Forest.</p>

			It is also necessary to introduce special rules for distribution (retail, only on the local market), which would prevent wholesale purchases by individuals/companies from outside the region.
39	<p>Polish Forest Society ul. Bitwy Warszawskiej 1920r. nr 3 02-362 Warszawa President of the General Board of the PFS prof. dr hab. Andrzej Grzywacz</p> <p>Secretary of the General Board of the PFS Dr inż. Jan Łukaszewicz</p>	<p>The position of the Polish Forest Society on the published report from the IUCN Advisory Mission to the World Heritage site "Białowieża Forest" on June 4-8, 2016.</p>	<p>We are surprised that our Society, active from 1882, the largest forest ecological organization in Poland, which in accordance with its Statute deals with the Białowieża Forest, was left out of the consultations carried out by the Experts of the IUCN Mission. At the same time small environmental groups that are groups that are not willing to compromise for the benefit of sustainable development had been taken into account. Their sole purpose is ecocentrism and strict protection throughout the Białowieża Forest. The Polish Forest Society is for maintaining strict protection in the Białowieża National Park and utilising active protection measures using the natural processes within Białowieża's forestry districts. Active protection must include protective treatments (regenerative cutting, among others) promoting the young generation of rare and receding tree species characteristic of the Forest. Białowieża Forest was included on the "WH" list only thanks to sustainable development and smart forestry carried out for centuries in most of its area. Abandoning such sustainable forest management, under the conditions of strict protection, leads to the degradation of the area, together with the disappearance of valuable natural habitats, species of plants and animals. This is demonstrated by reliable research on one of the oldest forestry research areas established in 1936 in a strict protection zone.</p> <p>We agree with the development of a management plan proposed by the members of the Mission in the "Recommendations". However, the we consider wording that "the requirements of world heritage" can only be realized through "methods that support natural ecological and biological processes" to be vague and dangerously close to the ideology of deep ecology, in which the active protection, for example, of natural habitats (Natura 2000), or biological diversity, is impossible. It is surprising that the IUCN experts do not support the fight against the bark beetle that decimates unique genetically, native spruce stands that originated in the Middle Holocene. These genetically-unique spruce stands, present only in the Forest are condemned to extinction by some environmental organizations, some environmentalists oblivious to research results, and IUCN experts in the reviewed report.</p>

			<p>To preserve the unique ecological niches of the World Heritage site "Białowieża Forest", one should use organic engineering methods on most of its surface, taking into account economic and social function of stands, and not only the principles of strict protection, because as a result of anthropogenic changes and climatic fluctuations, as mankind we may lose and we are losing the good World Heritage site "Białowieża Forest".</p> <p>The annexes include the last two positions of the Polish Forest Society on wildlife conservation, sustainable development and the wealth of nature in the Białowieża Forest.</p> <p>Annex No. 1 The Position of the Polish Forest Society concerning the Białowieża Forest of 22 June 2016.</p> <p>Annex No. 2. The position of the Polish Forest Society in defence of the natural wealth of the Białowieża Forest of 22 June 2016.</p>
40	<p>Stowarzyszenie Ruch Obrony Lasów Polskich General Board Ul. Bitwy Warszawskiej 1920 r. Nr 3 00-973 Warszawa</p>	General remarks	<p>Ruch Obrony Lasów Polskich (Polish Forests Defence Movement) is an organization of people interested in the preservation and development of Polish forests and, in particular, the Polish forestry model that has worked well over the past 100 years, allowing to meet the country's needs for the goods obtained from forests while conserving the environment and precious natural objects at a level that guarantees the survival of valuable habitats and species. We have analysed the Report with great care. Its contents, and especially the recommendations, raised serious concerns among us.</p> <p>Based on reading the report, you can get the impression that the authors do not fully realize what the Białowieża Forest is in fact. They have probably succumbed to the propaganda taught by some environmental activists that this is "the last primary forest in the Middle European Plain". Unfortunately, this argument is not true, as evidenced by a number of facts from the Forest's past. In fact, its unique value, both natural and cultural, owes to the fact that this is the result of more than 600 years of coexistence of the forest and the surrounding residents. As a result of the coexistence, the local community secured their conditions of existence and the forest managed to retain much of its original qualities. There were, however, activities that have adversely transformed the Forest's environment. One should</p>

			<p>enumerate the 19th century intensive hunting economy (during that period, the Forest was a hunting park for the tsars of Russia), the significant devastation made during the two World Wars by the occupants and the rapid exploitation of the in the 1920s by the British company Century, which was granted a concession for logging. As a result of all these activities, today's Forest is a conglomerate of areas with different degrees of naturalness, of which the most natural ones are situated within the National Park, and reserves and therefore strictly protected. These facts show that the protection of the entire area of the Białowieża Forest, if it is to be effective, must not be carried out according to one principle. The participants of the mission focused mainly on risks created by gradation of spruce beetle in spruce stands. We cannot agree with the proposition that these are natural processes and allow them to carry on. Even if you consider that the proportion of spruce in the composition of the stands is excessive, then its sudden dieback on thousands of hectares has very negative effects on natural habitats and species living in them.</p> <p>They bear the marks of an environmental disaster. It is also difficult to talk about natural processes in the forest, which exists in a surrounding environment transformed by man. The hydrologic conditions on adjacent areas, climate, as well as atmosphere composition are all different. The pressure of game on forest stands is also of great importance, as its population is unnaturally high.</p> <p>Mission experts completely omitted the problem of areas devastated in the past, as mentioned above. Measures started there to restore proper vegetation and restore habitats will take many years and require planned fellings.</p> <p>It must be concluded that the request to stop fellings (except in areas already under strict protection) is unfounded and will prevent the proper protection of the site. The appropriate level of cuts for all protection and breeding needs related with the restitution of habitat was specified in the forest management plan developed for Białowieża's forest districts, and reduced by an irresponsible and harmful decision of one of the previous Ministers of the Environment. The previous harvest limit should be restored as soon as possible. It is also necessary to appropriately manage game population, as its very large numbers cause</p>
--	--	--	---

			<p>hornbeams to dominate in the naturally regenerated stands, eliminating species that occur naturally in the Forest. Projections show that without the intervention of foresters in the near future the Forest will be dominated by hornbeam monoliths, eliminating the species diversity encountered today. Regarding tourism development proposed by the expert mission as the basis for the existence of the local communities in the place of the traditional benefits obtained from the forest, one should point out that it will not bring the expected results. Such areas are dominated by traffic focused on short tours, in addition limited to a short season, which brings relatively little income. There is no chance of developing more profitable tourism. As a result, the region – prevented from the development of traditional activities related to the Forest's timber – will continue depopulate.</p> <p>In conclusion, we would like to express our surprise from the fact that the Mission contacted almost exclusively non-governmental organizations representing the view that the entire Forest must be passively protected. In addition to our association, there is a number of organizations which have different views, repeatedly expressed in various statements and opinions, as well as in the media. We are also surprised by the mission experts relying solely on scientists presenting the above-mentioned position on the need of passive protection, with a complete omission of specialists in forest sciences with the greatest knowledge on the functioning of Forest's ecosystems.</p> <p>Summary: We regret that the report is superficial (it covers only of the issues related to the protection of the site) and one-sided. The included recommendations, in the case of their implementation, may hinder the proper protection of the "Białowieża Forest" World Heritage site.</p>
41	League of Nature Conservation General Board Ul. Tamka 37/2 00-355 Warszawa	General remarks	<p>1 Including the Białowieża Forest into the UNESCO List of World Heritage Objects is undoubtedly a confirmation of the effectiveness of existing policies and methods of conservation in Poland, and a source of national pride of having a beautiful and valuable site that failed that we managed to preserve in spite of a turbulent and rich history. The Forest has long been used by man. Even in the recent past, many hectares were clear-cut, stumps were cleared out, cattle and sheep were grazed. Resources acquired in the Forest were then</p>

			<p>processed in a number of plants in the area. Since the beginning of the 1990s, many changes related to the needs of conservation were introduced in the Forest, even before Poland started to apply the EU Habitats Directive and the Birds Directive (moratorium on the protection of old trees, extend the boundaries of the Białowieża National Park, creating new nature reserves, etc.).</p> <p>2. The extension of the World Heritage Site status unto the entire Polish part of the Białowieża Forest, as another form of nature conservation (next to a national park, numerous nature reserves, Natura 2000) with specific formal regulations creates problems for effective management of the property. The experts' statement that the requirements of the Convention on World Heritage and the EU Habitats and Birds Directives are consistent with each other is not confirmed in the provisions of the document nominating the Forest on the list of World Heritage sites. In all zones there are habitats and species listed in the two directives, which should be maintained in an unimpaired manner, which in certain situations requires active protection. If the future integrated management plan has yet to identify specific habitats and species designated under EU directives, which will require active management, then on what basis were the boundaries of individual areas delineated?</p> <p>3. The report highlights the need to develop a vision for the sustainable development of the Białowieża Forest region based, among others, on reliable socio-economic data, a clear strategy, adopted jointly by all stakeholders. Reliable data should be the basis of all the documents, this also applies to the re-nomination application of the Polish party from January 2012, as well as the Declaration of Exceptional Universal Value (OUV) adopted by the World Heritage Committee, indicating, inter alia, "the scale of its old growth forests, which include extensive undisturbed areas where natural processes are on-going".</p> <p>The terms "scale of old growth forests" or "extensive undisturbed areas" require clarification, because the overestimation of their importance may be considered as deliberately misleading the public, both in our country and internationally. The least altered parts of the Forest, having a character similar to natural occupies approx. 20% of the area and for the most part remains within the Białowieża National Park and 21 nature reserves.</p>
--	--	--	---

			<p>Fair presentation of these issues is far more important than the definitions pointed out in the Report of terms such as "sanitary cutting" (the definition can be found in the Encyklopedia Leśna. PWN Warsaw, 1991), or "security measures." The authors' suggestions, to establish a clear technical guideline for sanitary cuts and cuts as part of security measures, specifying when, where and how to make decisions, set out with the participation of all stakeholders are an example of extreme distrust, bureaucracy and neglect of knowledge, as well as the competence of the responsible departments.</p> <p>4. The conclusion of the authors of the report to develop a substantial programme of raising awareness of the local communities and civil society, on the functions and values of the Białowieża Forest has long been realized, although the effects are still insufficient. This is, among other things, because the message to the public still contains many inaccuracies, or even manipulation. Not all stakeholders are treated equally, particularly the local community, which has been associated with the Forest for generations, and is not able to understand further, drastic restrictions, as exemplified by bringing firewood for the needs of residents from outside the Forest.</p> <p>5. The Białowieża Forest is our common good. It deserves serious and responsible care, and therefore it should not be appropriated by any of the parties representing various concepts, because there is room for both strict protection and active nature protection. It is possible to determine rational proportions between them, provided there is good will on both sides.</p>
--	--	--	--

42	ClientEarth Prawnicy dla Ziemi Dzika Polska Greenmind Greenpeace Polska Ogólnopolskie Towarzystwo Ochrony Ptaków Pracownia na Rzecz Wszystkich Istot WWF Polska	3.1 In general	<p>It was rightly noted that the World Heritage Site "Białowieża Forest" is a natural area, therefore the "Programme for the Białowieża Forest as a cultural and natural UNESCO-heritage and the area of the Natura 2000 network" (Programme) is an improperly implemented document. The Programme's non-compliance with the conservation requirements of a World Heritage Site (WD Site) is also confirmed by the expert's remark about the lack of consideration for protecting the so called Outstanding Universal Value (OUV) of the WD Site, under the terms of inclusion on the World Heritage List. Such large defects of the Programme indicate the need for a substantial modification and until the elimination of incompatibilities with the requirements managing a WH Site, the Programme should not be implemented.</p> <p>The complete omission of assessing the impact of increasing the level of wood harvesting planned in the annex to the Forest Management Plan (FMP) for the Białowieża Forest District on the OUV of the WH Site and on its integrity, is a very significant defect. For this reason, in accordance with the precautionary principle, the annex should not be implemented until it has been shown to reliably estimate the impact. Moreover, the annex to the FMP for the Białowieża Forest District does not designate areas excluded from forest management, in accordance with UNESCO zones. Such a defect of the annex to the FMP for the Białowieża Forest District and the FMP for the Hajnówka and Browsk Forest Districts should be removed as soon as possible. Until then, the forest districts covering the Białowieża Forest should not conduct harvesting within UNESCO zones, where it is banned, also for "sanitary" reasons, allowing only for cuttings due to safety reasons while leaving the cut wood in place.</p>
----	---	----------------	---

43	ClientEarth Prawnicy dla Ziemi Dzika Polska Greenmind Greenpeace Polska Ogólnopolskie Towarzystwo Ochrony Ptaków Pracownia na Rzecz Wszystkich Istot WWF Polska	3.2 On the bark beetle outbreak, and 3.2 on how to address this issue	<p>Non-governmental organizations share the opinion of the expert mission that gradations of spruce bark beetle should be treated as a normal biological process, regularly and repeatedly occurring in the Białowieża Forest. Noteworthy is an indication that the factors influencing the occurrence of gradation also include climate change and recurring droughts, which is reflected in numerous scientific publications. In this context, the assessment found in the report should be emphasized, that the factor influencing the possibility of the current gradation of the bark beetle is found in former forest management of the site, which promoted artificial monocultural spruce planting.</p> <p>Non-governmental organizations fully identify with the diagnosis contained in Section 3.3 of the report, that the Convention provides a clear answer to the contentious issue of how to manage forests within a World Heritage Site. Białowieża Forest management should protect the natural dynamics of ecological processes, enabling effective protection of values that make up the object's OUV. These include the existence of large, well-preserved old growth forests, shaped by natural ecological processes, and the presence of large amount of dead wood in the stands, supporting a rich fauna of fungi and saproxylic invertebrates.</p> <p>We support the demand contained in the report for a clear definition of the terms "sanitary cutting" and "public safety reasons" as their current interpretation is highly ambiguous, especially for the general public, causing a number of doubts and intensifying disputes over use of the Forest. It is not clear to what extent are "sanitary cuts" included in the FMP's harvesting limit, or do they include only deadwood or also infested deadwood, and whether they can be performed in the stands that are more than a hundred years old or in reserves. It is also unclear whether the wood from sanitary cuts is earmarked for sale. This uncertainty also applies to cuttings justified by public security concerns, and the relations between the two mentioned types of cuts.</p> <p>It should be emphasized that the report confirms the earlier reports of non-governmental organizations that sanitary cuts and cuts justified by safety requirements conducted in recent months were often performed in places and situations which have no discernible connection</p>
----	---	---	---

			<p>with the postulated objectives of those cuts. In particular, IUCN experts confirmed the cuts previously reported by NGOs done in the "partial protection II" zone, are violating the protective regime established for those sub-compartments within the framework of the principles adopted in the management of the property.</p> <p>NGOs share the opinion found in the report that in recent years the risk of forest fire has remained in the Białowieża Forest at a low level, which is confirmed by the available statistics on the frequency and extent of reported fires. In this context, we would like to draw attention to the fact that the report's data on the actual number of fires originate from studies developed by the Forest Research Institute for the Ministry of the Environment, which were then used in the Greenpeace study. It is also worth noting that the experts wrote in the report, that in conducted fellings which were justified by fire safety reasons, waste biomass (cut dry branches) was left on site, which is inconsistent with the postulated objectives of the conducted cuts.</p>
44	<p>ClientEarth Prawnicy dla Ziemi Dzika Polska Greenmind Greenpeace Polska Ogólnopolskie Towarzystwo Ochrony Ptaków Pracownia na Rzecz Wszystkich Istot WWF Polska</p>	<p>4. Conclusions and Recommendations 4.1 Legal framework</p>	<p>The organizations agree with the conclusions and recommendations of the IUCN Mission Report on the consistency of the provisions of the "Convention concerning the protection of the World Cultural and Natural Heritage" and environmental legislation of the European Union concerning Natura 2000. As rightly pointed out by experts, the discrepancies relate to the objectives of managing World Heritage sites, certain economic indications contained in the forest management plans. Particular attention should be paid here to the fact that there are indications of economic measures serving as production functions of the forest in partial protection zone II (zone III, in order), where according to the WH Site nomination documents, such activities were excluded. This incompatibility can be eliminated by removing the economic and breeding guidelines from the forest management plans except those that directly serve to protect valuable habitats and species in accordance with the applicable plan of protection tasks for the Natura 2000 site.</p> <p>Organizations have long indicated a far-reaching discretion in the matter "sanitary cuts" and "occasional cuts" related to security reasons, including human and fire safety, were conducted in the Białowieża Forest. With this in mind, we make a declaration of cooperation for the</p>

			implementation of the IUCN Expert Mission recommendations on the development of guidelines for this kind of treatments conducted in the Białowieża Forest. These guidelines must take into account the provisions of the plan of protection tasks on the valuable habitats and species (CTP's compliance with criterion X of the Convention), and also serve to maintain the continuity of biological processes (criterion IX of the Convention).
45	ClientEarth Prawnicy dla Ziemi Dzika Polska Greenmind Greenpeace Polska Ogólnopolskie Towarzystwo Ochrony Ptaków Pracownia na Rzecz Wszystkich Istot WWF Polska	4.2 Governance	<p>Experts from the IUCN Mission rightly noted, among others, the poor communication between key stakeholders and hiding in "camps", between which the flow of information and knowledge is minimal.</p> <p>The lack of "effective mechanisms to ensure the involvement of local communities, non-governmental organizations, the scientific community and other key stakeholders" is a very important consideration. For this reason, we propose as soon as possible to provide such a mechanism and include key stakeholders in the process of managing the WH Site, including involvement from the beginning of the process of creating an Integrated Management Plan and other planning documents, assessing the impact of increasing the harvest limit in any of the forest districts of the Białowieża Forest area.</p> <p>In this chapter, experts recommend, and our organizations support:</p> <ul style="list-style-type: none"> · Significant improvement of good management of the World Heritage site and Białowieża Forest as a whole by establishing and maintaining managing institutions enjoying a wide range of acceptance and recognition. <p>The best solution for the implementation of this recommendation will be to give full management to a single institution, which will mainly be focused on the protection of the natural WH site, and also care for the development of the region, including tourism, and providing wood for the local community. Such an institution already exists. It is the Białowieża National Park. Including the entire Forest in a national park will exclude this area from the scope of the Forest Act and end the conflict about what to do in case of emerging successive gradation of the bark beetle, which, in turn, will facilitate the operations of the State Forests, which invoke the Act's inconsistency with international law.</p>

			<ul style="list-style-type: none"> · Ensuring that all stakeholders receive relevant and sufficient information, they can be represented and will be able to influence the counselling and / or decisions [...] at all levels - national and local. <p>Very good point, which many parties point out, including social organizations, scientists engaged in nature conservation or local governments. The Ministry of Environment should definitely implement this recommendation. Unfortunately, today we are witnessing an opposite trend, which is very concerning. We call for the inclusion of the social party (NGOs) and academics advocating the different solutions for the benefit of the Forest to the process of managing the World Heritage Site.</p> <p>Management conducted by two large institutions, one largely focused on obtaining timber, and the achievement of the profits (State Forests) and an institution, whose one of the main objectives is the protection of nature (Białowieża National Park) turns out not to be effective for the conservation of the World Heritage Site. We can see the violation of prohibitions concerning UNESCO zones, excluded from the cuttings, there is a tendency to increase timber harvest – one of the major threats to biodiversity and the integrity of the area. For this reason, the best solution for the protection of this object will be for the entire area to be managed by a single institution, associated with the area, with the objective of conserving of natural heritage. Granting the entire Białowieża Forest protection as part of a national park is such a solution.</p>
46	ClientEarth Prawnicy dla Ziemi Dzika Polska Greenmind Greenpeace Polska Ogólnopolskie Towarzystwo Ochrony Ptaków Pracownia na Rzecz Wszystkich Istot WWF Polska	Section 4.3 "Socio-economic issues"	<p>We agree with the conclusions of IUCN Mission Experts, i.e.:</p> <ul style="list-style-type: none"> · We believe that there is room to include the protection of cultural heritage for the differentiation and enrichment of services, in particular tourism. We emphasize, however, that the a WH Site is a natural object designated on the basis of criteria IX and X, and this should be largely the subject of protection. We agree with this there is a strong need to create a vision of sustainable development, taking into account, inter alia, all the benefits provided by the Forest and a tourism strategy consistent with the protection of the outstanding universal value (OUV).

			<ul style="list-style-type: none"> · In line with the conclusions of experts, we see the need to prepare and implement a programme of raising awareness of local communities and the society concerning the functions and all the values of the Białowieża Forest, in particular concerning the protection of natural processes and the role of dead wood in conserving the object. · In line with the current position, we believe that the demand for wood for the local community's own needs can be satisfied by the Forest's UNSECO zones where the cuts are permitted ("active protection zone"). Such demand for wood should be carefully estimated, and the product should be sold in retail, excluding online sales systems.
47	ClientEarth Prawnicy dla Ziemi Dzika Polska Greenmind Greenpeace Polska Ogólnopolskie Towarzystwo Ochrony Ptaków Pracownia na Rzecz Wszystkich Istot WWF Polska	4.4 Active management of habitats and species	<p>NGOs share the Expert's view that one of the causes of the conflict around the management of the World Heritage Site is the lack of a specific and operational programme of managing the site. The need to develop such a document was clearly articulated by the World Heritage Committee in 2014. We also agree with the assessment of experts that SF incorrectly interpreted the principles of management in the individual protection zones of the site designated at the re-nomination of the property as a World Heritage site. This led to cuts (both proposed and executed) in the "partial protection II" zone, i.e. in places where they should not have taken place. We share the opinion expressed in the context of the necessity for the so called active protection of stands, that many of the accepted standards and practices in forest management are not consistent with the objectives of nature conservation.</p> <p>Special attention should be paid to the Mission's recommendation for the management performed in the Białowieża Forest to serve the conservation and restoration of the current state of the ecosystem, while maintaining the principle of minimising treatments performed by man and supporting natural processes. This should lead to a ban on the introduction of artificial regeneration of spruce stands in commercial stands. According to IUCN experts, treatments should be restricted to activities consistent with the requirements of criterion IX (conservation of spontaneous ecological processes) located in artificial spruce single-species plantings. In this context, non-governmental organizations share the opinion formulated in Section 4.2 that site management should include an institutionalized participation of all</p>

			stakeholders, including NGOs and scientists, in decisions concerning the location and extent of potential sanitary cuts.
48	ClientEarth Prawnicy dla Ziemi Dzika Polska Greenmind Greenpeace Polska Ogólnopolskie Towarzystwo Ochrony Ptaków Pracownia na Rzecz Wszystkich Istot WWF Polska	Recommendations	<p>We fully agree with the recommendations provided by the IUCN Experts in their report:</p> <ul style="list-style-type: none"> · The process of developing a management plan should have been initiated long ago and in line with the recommendations, it should have included all stakeholders from the beginning. Such a plan should be fully consistent with the "requirements for World Heritage and supporting natural ecological and biological processes". · The integrated management plan should be assessed by the World Heritage Centre before making a final decision on its finalization. · Solutions concerning the management of the Polish part of the WH site should be introduced as soon as possible, in addition to the steering committee, ensuring participation of key stakeholders in the management of the Site. · One should build a broader vision of sustainable development of the Białowieża Forest, which will take into account the ecosystem services provided by the Forest. · One should definitely suspend the annex to the Forest Management Plan for the Białowieża Forest District, and not make changes to the FMP for the remaining forest districts, while the development and approval of an integrated management plan is pending. During this period, only cuts for safety reasons while leaving the harvested wood in place should be permitted in the Białowieża Forest District. In addition, we believe that the FMP for all forest districts should be consistent with the principles of World Heritage Site management, and these plans should include a reliable assessment of the impact on the outstanding universal value (OUV) of the area. <p>In our opinion, the report of the IUCN Expert Mission of IUCN is solid, professional, based on extensive scientific literature, data, and the opinions of all key stakeholders. For this reason, the recommendations of independent experts should be implemented as soon as</p>

			possible.
--	--	--	-----------

49	<p>Collective letter addressed personally to the IUCN Advisory Mission</p> <p>Mr. Hevre' Lethier Mr. Oliver Avramoski</p> <p>The undersigned: 1. Mayor of Hajnówka 2. Mayor of Białowieża 3. Chairman of the Białowieża Municipal Council 4. Parish Priest of the Roman Catholic Parish in Hajnówka 5. Starost of the District Office in Hajnówka 6. The Orthodox Parish in Hajnówka 7. Chairman of the District Council in Hajnówka 8. Mayor of Kleszczele</p> <p>9. Mayor of Czeremcha 10. Mayor of Dubicze Cerkiewne 11. Mayor of Narew</p>		<p>The Białowieża Forest, as a UNESCO World Cultural and Natural Heritage Site, or the World Heritage Site "Białowieża Forest", according to the report, is an entity under special protection of the Polish, and EU law, as well as UNESCO. The WH Site constitutes also a huge responsibility in terms of its preservation for future generations. The destruction of World Heritage Sites is irreversible as evidenced by the statues of Buddha in the Bamiyan Province near the Band-e Amir Lake in Afghanistan or the ancient ruins of Palmyra in Syria.</p> <p>The report developed by the IUCN Advisory Mission visiting on 4-8 June 2016 does not refer in any way to the facts existing in the Białowieża Forest. It does not represent the scale of destruction, the destructive activities of recent years, which have led to a situation in which we can only talk about fragments of the Białowieża Forest and not the Białowieża Forest. According to experts, do entire hectares of forests without any living trees also constitute the Białowieża Forest?</p> <p>The report only presents statements, you refer to criteria IX and X of the World Heritage Convention, expert opinions, tables, maps, stakeholders and the opinion of the local community only to a slight degree. There is no data whether the scale of the devastation in the Białowieża Forest as a result of massive spruce bark beetle gradation and over 4 million cubic metres of fallen and rotting trees of different species (oak, ash, maple, alder, pine) is not a threat to criterion X of the World Heritage Convention. It's like after the Moon landing, we would write in the report only about the qualities of the spacecraft and not of the Moon.</p> <p>The report presents the Forest as something that exists only by itself. Białowieża Forest exists because for many centuries it has been managed by Polish foresters, whose knowledge and expertise is recognized around the world and Polish forest expertise makes a great contribution to world science.</p> <p>Ladies and Gentlemen, the report cites the Universal Declaration of Outstanding Exceptional Value (OUV) indicating, among others, on "the scale of its old growth forests, which include extensive undisturbed areas where natural processes are on-going. A consequence is the richness in dead wood, standing and on the ground, and consequently a</p>
----	--	--	---

<p>12. Mayor of Narewka 13. Hajnówka Town Mayor 14. Hajnówka Deputy Town Mayor</p> <p>Spółeczny Ruch Obrońców Puszczy Białowieskiej</p> <p>1.Mieczysław Gmitter 2.Ewa Rudnicka 3.Halina Czarnulicz 4.Diana Ośródek 5.Marcin Gmitter 6.Bogdan Łabędzki 7.Magdalena Gmitter 8.Janiusz Antipow 9.Władysław Gmitter 10.Jakub Józwik 11.Marcin Klim</p>		<p>high diversity of fungi and saproxylic invertebrates" which is far from the truth, to put it mildly. According to prof. Aleksander Sokołowski of the Forest Research Institute, natural and primary forest covers 9% of the Białowieża Forest (the opinion is 15 years old, and currently it is approx. 6% of the area). In contrast, the preservation of Białowieża Forest's forest ecosystems by giving them back to nature and minimizing human intervention does not coincide with the result of evaluations and research.</p> <p>"It turns out, however, that natural spontaneous successional changes are precisely the factor that threatens vascular plants the most. In the Białowieża Forest "natural, spontaneous successional changes" consist mostly in the uncontrolled expansion of one species - hornbeam, species strongly overshadowing the soil, causing the disappearance of many species of plants, especially those with more light and heat demands" (Kwiatkowski and Wyszomirski 1998; Sokołowski 2004 ; Matuszewicz 2011). Such changes have a particularly important role in the areas taken out from economic use and granted strict protection (Bernadzki et al., 1998 a and b; Brzeziecki et al. 2016). Such a state leads to adverse changes in the demographic structure of many species of trees. This is particularly evident in the Core Zone of the Białowieża NP (Bernadzki et al. 1998 a and b; Brzeziecki et al. 2016). Such changes decide and have a huge impact on the functioning of ecosystems in the Białowieża Forest. "Trees are the basic components of forest ecosystems on which processes such as productivity, water balance, the rate of organic matter decomposition, nutrient cycling, carbon sequestration and energy flow all depend (Ellison et al. 2005)". Prof. Bogdan Brzeziecki (2016) concludes, "In addition, the trees found in forest ecosystems affect directly or at least indirectly the functioning of all the other elements of the forest biocenosis. Therefore, any change to the tree species making up the forest community translates into a change in the whole biocoenose of the forest and causes negative consequences for the generally understood biodiversity of this area".</p> <p>In summary, the basis of all the processes taking place in the Białowieża Forest is found in trees, and they determine the biodiversity of the area. They decide the preservation of species and maintaining the continuity of the forest for future generations.</p>
---	--	--

			<p>The report particularly shows the decision of the Minister of the Environment to increase the harvest limit for the Białowieża Forest District from 63,471m³ to 188,000m³ due to three main threats:</p> <p>"- occurrence of severe damages in the stands and start of the regeneration process of natural habitats, including the ones important for the Community.</p> <ul style="list-style-type: none"> - ensuring the safety of the people residing in the Białowieża Forest - increased fire hazard." <p>As you are writing in the report, in the Białowieża Forest "bark beetle outbreaks should be considered as a biological process". Well, no, in the Białowieża Forest there is a gradation of the spruce bark beetle, in some works called a grave robber of unprecedented scale and not a bark beetle outbreak. "If such a forest cemetery is left neglected, the spruce corpses are not removed, then the grave robber – spruce bark beetle and its companion the ipini (<i>Ips sexdentatus</i>) – shows up almost at once. They first infest the lying trunks, and multiply rapidly, because swarms occur twice in the spring and summer (in the case of the current gradation in the Białowieża Forest, 1-5 populations a year)</p> <p>– they move from dead trunks to healthy trees and bore tunnels under the bark in the pulp – the most vital tissue – causing gradual death of the spruce" (Radwańska – paryska 1963).</p> <p>The current spruce bark beetle gradation exceeds the gradation of the 1920s by several times.</p> <p>Zygmunt Mokrzecki, an eminent entomologist, on 27 January 1923 at the fifth meeting of the Forest Protection Committee announced: "that the massive intrusion of the spruce bark beetle is suppressed in the Białowieża Forest by the joint work of foresters, entomologists, with the help of meteorological factors and parasites and robbers".</p> <p>Professor J.J. Karpinski pays special attention to the balance between tree vegetation, pests that may destroy them, and factors crippling the devastating impact of those factors, "As</p>
--	--	--	--

			<p>long as these fluctuations take place within the limits of determining the balance until the forest lives and grows successfully, at the moment, however, when fluctuations come beyond, following the pests' destruction of more pulp than is permitted in the forest's normal life (Karpinski 1935 p.7).</p> <p>The Minister of Environment of the Government of the Republic of Poland, professor Jan Szyszko made the right decision to increase the harvest of trees, allowing to reduce the ecological disaster in the Białowieża Forest, which we fully support. This decision implements Article 5 of the Constitution of the Republic of Poland. It allows to stop the dieback of valuable priority habitats for the European Community, i.e. 91D0 (bog woodland), 91E0 (alluvial forest), 9110 (beech forests) and 9170 (oak-hornbeam forests). The dieback of priority habitats is also followed by the disappearance of species important for the European Community as well as the World Heritage Site.</p> <p>The above arguments contradict the arguments often voiced by the so-called ecological groups, that the bark beetle was always present in the Forest. Of course, it was always present in the Forest, but remained under control, which allowed to prevent gradation. Cholera has also been always present in the world, but it has not always been an epidemic. More than 50% population died during the cholera epidemic in 14th century Europe. And this is the fundamental difference between "was" and "gradation".</p> <p>Implementation of the decision of the Minister of the Environment making changes to the forest management plan for the Białowieża Forest District primarily requires "sanitary cuts", whose importance you seem not to understand. In our view, sanitary cuts are the removal of infested trees in the early stages of infestation by the spruce bark beetle and moving them outside the Białowieża Forest. These activities should include the forest outside the strict protection zone of the Białowieża National Park. Then we can be sure that the spruce bark beetle gradation is under control, which will allow us keep the remnants of spruce stands.</p> <p>Otherwise, 1/3 of the forest will cease to exist (the area covered by spruce stands), according to foresters – in 2-3 years. The Forest service estimates that in 2016 subsequent populations</p>
--	--	--	---

		<p>of the spruce bark beetle killed off approx. 100,000 m3 of spruce trees each month.</p> <p>The state of the Białowieża Forest is also a huge security risk to the health and lives of forest services workers and persons present on its territory. No guidance, study, regulations, rules, criteria are able to predict when a dead tree breaks, falls, or one of the branches falls down. There is no denying the laws of physics, what every child in primary school knows, that the force of a branch falling from the height of 1 m is smaller than one falling from 20 - 30m, not to mention the force of a falling tree weighing several hundred kilograms. Currently, such a threat is real throughout the Białowieża Forest and it dramatically increases every day. In a short time the only means of ensuring security in the Białowieża Forest will be to ban entry into it. The entry ban will concern both residents, tourists as well as representatives of science and so-called green environment (safety rules in state forests set out in Chapter V, Article 26 pt. 3 paragraphs 1 and 2 of the Forest Act of 28 September 1991).</p> <p>To sum up our modest comments to your report, it is clear that none of the World Heritage Conventions, European Union Laws, Polish Laws and the Polish and global forest science cited in the report does not allow for and even opposes the destruction and devastation that has been done in the Białowieża Forest. They can only be compared to the already cited examples of WH Sites in Afghanistan and Syria.</p> <p>The enrolment of the Białowieża Forest on the World Heritage List cannot form the basis for creating a new direction in science - bringing ecological disaster - wastelands and build something new on ruins. World Heritage cannot constitute a capital punishment for the forest.</p> <p>We also believe, that the statement "the SF has been forging ties with the communities, in particular with their elected leaders, whereas the administration of the BNP looks to be more opened to environmentalists and the associated research community" found in your report requires some further explanation.</p> <p>Dear Experts, the State Forests have been forging ties with the residents of the surrounding land, the hosts of the Białowieża Forest, who have been living in the forest for generations,</p>
--	--	--

		<p>and the forest lived with them. These are the people who planted more than 90% of the trees, cared about its existence, beauty, its importance, and at the same time used its wealth. The Forest owes its breadth to them and the Polish foresters.</p> <p>You oppose environmentalists and the associated academia against this community. The concept of ecology has recently become one of the more mainstream catchphrases. A field right next to medicine that everyone knows something about. Its creator, Ernst Haeckel, a biologist – populariser of Darwin's theory (1867) – understood it, among others, as an interaction between all animate and inanimate organisms, humanity itself is not the centre of thought, but life as a whole. Today, the proponents of the biocentric theory and deep ecology preach similar theories (Arne Naess). They also place man on par with other of nature's creations. According to them, man in the Białowieża Forest is an unnecessary element, and the Minister of the Environment, together with foresters, are simple pests. Two of the most murderous ideologies of the world – Nazi Germany and Pol Pot's Cambodia derive from the philosophy of ecology and strict ecology. Manipulating scientific research, media messages, misleading society and the public is a standard.</p> <p>An example is a BP nature reserve , where monitoring of research surfaces has been conducted since 1936 by the Warsaw University of Life Sciences' Department of Silviculture SGGW (Founder – prof. T. Włoczewski). In the media, the environmental community presents the strict reserve as an example of renewal of the forest in the natural conditions, never mentioning the study results.</p> <p>Studies have shown that the structure of the forest has changed entirely in the strict reserve. Hornbeam, and linden until recently, is the most expansive species. Pine (approx. 5%) and spruce (approx. 15%) stands are receding. Oak, ash and maple stands are also disappearing. It is particularly worrying that these stands are almost absent in the restorative stands, unable to break through to the higher layers.</p> <p>Can we perceive environmental organisations as non-governmental and objective? Not really. As calculated by the British think-tank International Policy Network, 9 out of 10 of</p>
--	--	---

		<p>the largest environmental organisations in Europe, forming the Green 10 coalition, received 66 million euro of direct grants from the EU in the years 1998-2009. The income of the most "entrepreneurial" organisations such as Birdlife Europe, Friends of the Earth International or WWF increased by 270 – 900%.</p> <p>The European Commission can always count on organisations gathering activists and ideologues of environmentalism in cases such as the Białowieża Forest. We would not want UNESCO or the Advisory Mission to also benefit from the knowledge of such experts. Only those experts could help formulate the conclusion that "Although often cultural heritage protection was set against nature protection" – where and when, because we do not think it was the case of the Białowieża Forest and the residents of the Hajnówka District.</p> <p>Ladies and Gentlemen, the conclusions found in the report "there seems also to be a lack of local capacity to raise EU funding opportunities by the local governments, which does not have probably enough capacities to prepare applications" and "strong awareness program should be developed for the local communities and the civil society, on the functions and all of the values of the Białowieża Forest, addressing concerns regarding harvesting, but also focusing on other environmental services, such as tourism, small wood manufacturers that may in the short term find use of the dead spruce trees affected by bark beetle "marginalise knowledge, efficiency and commitment of local authorities and the local community.</p> <p>It is the local governments and communities that can be the model example of how to care for nature (the Białowieża Forest) in accordance with the principle of sustainable development.</p> <p>It is the Polish Government, the Polish Minister of the Environment, Professor Jan Szyszko, the Polish Forester, local authorities and the local population in cooperation with academic institutions such as the Department of Silviculture of the Warsaw University of Life Sciences, the Forest Research Institute, etc. who are able to preserve the Białowieża Forest green and standing, ensuring the continuity of species and forests, for future generations.</p> <p>A natural primeval forest is a forest where the trees live, where all biological processes</p>
--	--	--

			<p>occur.</p> <p>We do not want a grey primeval forest riddled with ecological catastrophe and resembling the lunar landscape, where tourists – after seeing it – always ask "what is happening here, who let this happen? ".</p> <p>Common sense and reason has to return to the Białowieża Forest, and the Polish and global forest science, the experience of Polish foresters, the knowledge and expertise of the hosts of this land (local population) will achieve success for the UNESCO World Heritage Site, and not the benefits of the various groups and associations whose raison d'être is found in inflaming the situation surrounding the Forest.</p>
--	--	--	--

**REGIONAL DIRECTORATE OF STATE FORESTS
IN BIAŁYSTOK**

SUMMARY

**OF THE STRATEGIC ENVIRONMENTAL IMPACT
ASSESSMENT of the Amendment TO THE FOREST
MANAGEMENT PLAN FOR THE BIAŁOWIEŻA FOREST
DISTRICT**

1.01.2012 – 31.12.2021

12 February 2016

Table of contents

- 1. Justification for the choice of the adopted Amendment to the Forest Management Plan – page 2**
- 2. Findings contained in the annex to the environmental impact forecast, opinions of the competent authorities (Articles 57 and 58 of the Act on the provision) – page 7**
- 3. Public participation in developing the Amendment to the Forest Management Plan – justification pursuant to Article 42(2) of the Act of the provision –page 10**
- 4. Results of the procedure concerning the transborder environmental impact, if it has been carried out – page 13**
- 5. Proposals regarding the methods and frequency of carrying out monitoring of the effects of implementing the provisions of the document – page 14**
- 6. Attachments**

Ad 1 Justification for the choice of the adopted Amendment to the Forest Management Plan (FMP)

1. Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment (OJ EC L 197 of 21.07.2001),
2. Act of 3 October 2008 Act of 3 October 2008 on the provision of information on the environment and its protection, public participation in environmental protection and environmental impact assessment (Journal of Laws No 199, item 1227, as amended: Journal of Laws of 2008, No 227 item 1505), in particular Article 55(3) which specifies the scope of summary.

The Act of 3 October 2008 on the provision of information on the environment and its protection, public participation in environmental protection and environmental impact

assessment, hereinafter EIA Act of Law, (Journal of Laws No 199, item 1227) has introduced an obligation to carry out a strategic environmental impact assessment, understood as a procedure with regard to the environmental impact assessment of the effects of implementing “policies, strategies, plans or programmes in the field of (...) forestry (...) developed or adopted by the administrative authorities, setting out a framework for the further implementation of projects likely to have a significant environmental impact” or plans “whose implementation may result in a significant impact on the Natura 2000 site” [Article 46 of the above-mentioned Act]. In connection with the letter of the Director of the Regional Directorate of Environmental Protection in Białystok (letter: WPN.611.16.2015.AP of 14.07.2015), pursuant to the above Act, the Director of the RDEP has been obliged to carry out a strategic environmental impact assessment for the Amendment to the Forest Management Plan for the Białowieża Forest District for 2012-2021.

Preparing the Forecast, as a part of the strategic environmental impact assessment, has resulted from a need to check the impact of planned changes in the FMP on frequently occurring and particularly valuable subjects of conservation of the Białowieża Forest Natura 2000 site. The Amendment to the Białowieża Forest District FMP applies primarily to removing infested spruces in all age classes due to the limitation of the outbreak of European spruce bark beetle. In addition, trees will be removed to provide safety of people staying in the Białowieża Forest, as the accumulation of dying trees is a public threat. This refers to hiking trails, places of rest and recreation in the forest. It may be necessary to close many areas of the forest popular among tourists. This will have negative consequences for the region. In addition, the drought in recent years has contributed to dying of trees and spruce stands, which resulted in the increase fire hazard in the Forest. However, the basis for preparing the annex is a need to make sanitary fellings to reduce the outbreak of European spruce bark beetle. The Białowieża Forest District infested an area of 12.5 thousand ha. Nature reserves in the Forest District cover about 34.5% of the area i.e. 4.3 thousand ha. In addition, there are numerous protection zones established by administrative decisions of the RDEP in Białystok (approx. 484 ha). Sanitary fellings planned in the annex will not be carried out in nature reserves, boggy and moist habitats (Bw, BMw, LMw, Lw, Bb, BMb, LMb, OI, and OIJ), and in the protection zones which amounts in total to 7,123 ha (58% of the area of the Białowieża Forest District).

Dead wood will not also be removed, except for the situations being a threat to common safety. The volume of dead spruce wood in the area of the Białowieża Forest District amounts to (797,766 m³). The annex does not provide for carrying out intermediate and final fellings in case of tree stands which are older than 100 years (as determined by the so-called Wesołowski's definition). In these forest stands, sanitary fellings will be carried out only and exclusively for removing infested spruce snag. Insect-free snag in these forest stands will not be removed. As of 01.01.2012, the main species forming forest stands in the Białowieża Forest District was spruce (31.54% of the area) with the volume contribution of 1,454,254 m³ by prevailing species and of 1,631,130 m³ by real species. In all forest stands in total, including nature reserves, since the inception of the Forest Management Plan (in the years 2012-2015) the quantity of designated infested spruces was 335,894 m³, including 63,689 m³ in nature reserves and in forest stands older than 100 years, according to the Prof. Wesołowski's definition, 197,272 m³ of spruce wood. In the period from the August to December 2015, 66,919 m³ of occupied spruces were designated, of which 12,187 m³ were obtained. The remaining quantity of fully occupied wood is 54,732 m³. This quantity represents a reservoir of harmful insects. No action in these forest stands will result in further spread of bark beetle. The possibility of removing infested trees will result in reduced rate of the decline of spruce stands and collapse of the outbreak.

Taking into account the impact of sanitary fellings on the subjects of conservation, for which the Białowieża Forest Natura 2000 site was established, it should be pointed out that it will not have a significant negative impact on the site. The Natura 2000 site cover an area of 63,147 ha. The Forest District will potentially carry out sanitary fellings in the maximum area of about 5.1 thousand ha, which represents about 8% of the area of the Natura 2000 site. The estimated quantity of dead wood left (about 1,038 million m³) protects habitats of saproxylic invertebrates species. In addition, it should be pointed out that for some beetles (*Cucujus cinnaberinus*, *Boros schneideri*, hermit beetle, Goldstreifiger) a dying spruce is not a place of their existence. For the birds: Eurasian pygmy owl, Eurasian three-toed woodpecker, single cases of a negative impact on the habitat may not be ruled out. However, given the lack of interference in 58% (nature reserves – 4,304 ha, zones – 484 ha, moist habitats – 2,336 ha) of the area of the Forest District, we may rule out a significant negative impact on the subjects of conservation.

Conservation measures provided for in the annex, in relation to forest habitats, will take into account the spatial context of situation of patches of natural habitats and the age of tree stands. In order to modify the structure and function of forest habitats (improved assessment) by increasing the stocks of dead wood, what will be left on-site is wood of species specific to the habitat while wood of ecologically alien species will be removed. Coniferous and broad-leaved forests on a humid to wet peaty substrate of type 91D0 will be excluded from forest activities, in accordance with the approved plan of conservation tasks (CTP). Definitely, additional considerations are required by patches of subboreal spruce forest on peat, being at risk of the bark beetle disaster. In case of species: A223 Boreal owl, A239 white-backed woodpecker, A241 Eurasian three-toed woodpecker, an obvious threat is the outbreak of bark beetle, which results in rapid dying of the forest in a large area, thus reducing dramatically the coverage of forest stands with old spruces. In the long term, this phenomenon will lead to a radical deterioration of the condition of habitats and habitats of species associated with spruce. The accumulation of such a large number of dead and dying trees, both standing and lying, is also a real threat to safety of persons staying in the Białowieża Forest. This applies in particular to hiking trails or other places of rest and recreation in the forest. Consequently, it may be necessary to close many interesting areas which are very popular among tourists. This will have negative consequences for the economy of the region.

In addition, the on-going drought in the second half of 2014 and 2015, apart from the catastrophic infestation of bark beetle and leading to the accelerated process of dying of spruce forests, has also contributed to an enormous increase in the fire hazard in the Forest. Therefore, a very important measure for the conservation of individual habitats and species associated with spruce is the regular designation and removal of infested spruce snag in forest stands in a period of the active development of bark beetle. We assume that this will reduce the rate of the decline of spruce stands and collapse of the outbreak. This will solve many above-mentioned problems in the Białowieża Forest (fire protection, safety of persons staying in the Forest, conservation of habitats and species being the subjects of conservation and other).

This situation poses mainly a threat to maintaining the exceptional natural values of the Białowieża Forest, particularly valuable natural habitats and many species associated with old growth spruce forests. Among them, there are species and

habitats that are the subjects of conservation in the Białowieża Forest Natura 2000 site, e.g. Eurasian three-toed woodpecker, *Pytho kolwensis*, spruce forest on peat, etc. A failure to take appropriate conservation measures may result in a significant deterioration of their conservation status.

The Amendment to the Forest Management Plan for the **Białowieża Forest District** has been developed pursuant to Article 23 of the Act on forests of 28.09.1991 and §4 Part I of the Forest management instruction (Ordinance No 55 by the Director-General of State Forests of 21.11.2011).

The Agreement No ZR.271-34.2015 on the case in question was concluded on 11.08.2015. The date of executing the contract was scheduled for 30.10.2015.

A need to draw up the Amendment to the Forest Management Plan is a consequence of the disaster caused by the outbreak of bark beetle and a necessity to combat the spreading phenomena according to the Forest Protection Instruction and the provisions of the Act on forests (§ 9(1)(2)).

In the Białowieża Forest District, forest stands older than 100 years haven't been available for wood supply. The growth rate of infestation of the bark beetle and its destructive impact on protected spruce tree stands older than 100 years have not been taken into account. The rapid increase of the outbreak of bark beetle resulted in the decline of tree stands dominated by spruces. The Minister of the Environment, by Decision DL-Ipn-611-31/40283/12 of 9.10.2012 approved the Forest Management Plan by specifying the allowable fellings for wood supply (final, intermediate) in the volume of 63,471 m³ of net large timber for a period of 10 years. The permanent threat to spruce stands and the unlimited expansion of bark beetle makes it necessary to carry out additional felling resulting from sanitary needs, and consequently to obtain additional volume of wood. The above is to slow down the outbreak and stop the decline of tree stands valuable in natural terms. The execution of the annex will allow concurrently to perform planned breeding and conservation works.

Without introducing the annex and carrying out fellings, there will be a dynamic increase in the number of spruces infested by bark beetle which will create a further threat to the stability of forest stands in the Białowieża Forest and will increase a threat to safety of people staying in the Białowieża Forest.

In connection with the above, it should be concluded that the presented version of the Amendment to the FMP applies only to the work related to removing the threat caused by the outbreak of bark beetle and inhibiting the decline of forest stands. It should be stressed that the fast decline of forest stands is a threat to valuable natural habitats and protected species being the subjects of conservation under the Natura 2000 network.

Ad. 2 Findings contained in the annex to the environmental impact forecast, opinions of the competent authorities (Articles 57 and 58 of the Act on the provision...)

The basis for drawing up the Amendment to the Forest Management Plan for the Białowieża Forest District is a necessity to carry out sanitary fellings aimed at slowing down the outbreak and guaranteeing safety of people staying in the Białowieża Forest. An analysis of the impact of cutting on the species and natural habitats that are the subjects of conservation of the Natura 2000 site proves that planned cuttings will result in slowing down the process and will be conducive to improving the conservation status of the following subjects of conservation of the Natura 2000 site PLC200004 *Tilio-Carpinetum betuli*, honey buzzard, Eurasian pygmy owl, Boreal owl, white-backed woodpecker, Eurasian three-toed woodpecker, red-breasted flycatcher, collared flycatcher, stock dove, hermit beetle, Goldstreifiger, *Cucujus cinnaberinus*, *Boros schneideri*. All the work will be carried out in accordance with the Plan for Conservation Tasks established for the Białowieża Forest Natura 2000 site PLC20004, which allows to carry out sanitary fellings during a strong outbreak of bark beetle in tree stands in all age classes.

Stages of activities:

The permanent threat to spruce tree stands and the unlimited expansion of bark beetle resulted in the decline of tree stands dominated by spruces. In the years 2012-2015, the Białowieża Forest District obtained 61,180 m³ of large timber (which is 96.39% of the allowable cut). The current sanitary status of the forest makes it necessary to take immediate emergency measures.

Guided by the aforementioned considerations, the Forest Inspector of the Białowieża Forest District applied for the annex to the forest management plan (letter ref. ZG:6005.1.2015 of 07.07.2015).

1. The Director of the RDSF in Białystok submitted an application for withdrawing from the strategic environmental impact assessment for the Amendment to the FMP for the Białowieża Forest District (2012-2021). (letter ref.: ZS:6005.69.2015 of 07.07.2015) to the Regional Director of Environmental Protection in Białystok (RDEP) and the Voivodship State Sanitary Inspector in Białystok (VSSI).
2. The Director of the RDEP in Białystok (letter ref. WPN.611.16.2015.AP of 14.07.2012) **did not agree** to withdraw from carrying out a strategic environmental impact assessment for the Amendment to the Białowieża Forest District FMP (2012-2021).
3. The Director of the RDSF in Białystok applied for the scope of the Forecast to the VSSI in Białystok and the RDEP in Białystok (letter ref.: ZS:6005.69.2015 of 17.07.2015).
4. The above-mentioned authorities agreed the scope of the Forecast (RDEP letter WPN.611.22.2015 AP of 4.08.2015) and (VSSI letter NZ. 0523.91.2015 of 21.07.15).
5. The Forest Inspector of the Białowieża Forest District submitted a new application for the annex to the forest management plan (letter ref. ZG: 6005.1.2015 of 17.12.2015). The application has been prepared on a basis of the documentation for the purposes of the annex to the FMP and Forecast to the documentation in question developed by the Bureau for Forest Management and Geodesy (BFMG), Branch in Białystok.
6. The Director of the RDSF asks the authorities to issue an opinion on the documentation concerning preparing the annex to the forest management plan together with the Forecast.
7. The Podlasie State Regional Sanitary Inspector issued a positive opinion on the Amendment to the Forest Management Plan (opinion No 409/NZ/2015, letter ref.: NZ 0523.191.2015 of 10.11. 2015).
8. The Regional Director of Environmental Protection (letter WPN.611.38.2015.AP of 16.11.2015) issued a negative opinion on the Amendment to the Forest Management Plan for the Białowieża Forest District for 2012-2021 along with the environmental impact forecast.
9. The Director of the RDSF, referring to the position of the RDEP in Białystok, called on the Contractor to supplement the Forecast as regards the assessment of the status of natural habitats.

10. The Director of the RDSF reapplied to the RDEP for issuing an opinion on the documentation concerning preparing the annex to the forest management plan together with the Forecast.

11. The Regional Director of Environmental Protection (letter WPN.611.38.2015.GP of 17.12.2015) issued a positive opinion on the draft documentation of the Amendment to the Forest Management Plan for the Białowieża Forest District for 2016-2021 increasing the volume of harvesting to 132,457 m³. It should be noted that the proposed volume in the documentation of the annex was 317,894 m³.

12. The Director of the RDSF submitted to the RDEP the application of the Forest Inspector of the Białowieża Forest District of 17.12.2015 regarding the volume of the Amendment to the FMP amounting to 317,894 m³ of net large timber, which resulted from the documentation to the annex developed by the BFMG, Branch in Białystok.

13. The Regional Director of Environmental Protection, in the letter ref.: WPN.611.38.2015.GP of 28.12.2015 referred to the opinion issued on 17.12.2015 in which he issued a positive opinion on the draft documentation of the Amendment to the Forest Management Plan for the Białowieża Forest District for 2016-2021.

14. The Director of the RDSF, by letter of 5 January 2016, applied for issuing an opinion on the documentation of the Amendment to the FMP along with the Forecast (referring to the letters ZS.6005.9.2015 of 06.11.2015, of 10.12.2015, of 18.12.2015) in which the harvest volume within 10 years increased to 317,894 m³. He asked for referring to the application in its entirety (its final content) and for issuing an opinion immediately.

15. The RDEP in Białystok (letter WPN.611.38.2015.GP of 08.01.2016) submitted queries and asked for explaining the provisions of the documentation of the annex for taking the final position and issuing an opinion.

16. The Contractor (BFMG, Branch in Białystok) of the documentation of the Amendment to the FMP provided appropriate explanations to the comments submitted by the RDEP.

17. The Director of the RDSF, by letter of 12.01.2016, reapplied to the RDEP for issuing an opinion on the maximum volume to harvest 317,894 m³ of net large timber which results from the documentation developed for the annex. He also informed that the Amendment to the Białowieża Forest District FMP applies to removal of infested spruces in all age classes due to the ongoing strong outbreak of bark beetle. The basis for drawing up the annex is a need to carry out sanitary fellings aimed at

slowing down the outbreak and stopping the decline of tree stands valuable in natural terms as well as protecting habitats valuable in natural terms. He pointed out that without the introduction of the annex, the stability of tree stands would be violated, which would also create a threat to safety of people staying in the Białowieża Forest.

18. In response, the Director of the RDEP (letter WPN.611.38.2015.GP of 18.01.2016) issued a negative opinion on the documentation of the Amendment to the Forest Management Plan for the Białowieża Forest District for 2016-2021 along with the environmental impact forecast for the volume of 317,894 m³. Also, the RDEP in Białystok, noticing the outbreak of bark beetle and related consequences, referred to the letter (WPN.611.38.2015.GP of 19 December 2015), in which it issues a positive opinion on modifying the Białowieża Forest District Forest Management Plan for **2016-2021 by the harvest volume of 132,457 m³**.

In its opinion, the RDEP referred to the cartographic documentation, which had been prepared based on a background map of 1.01.2012 where planned cuttings were marked as of 1.01.2015. The RDSF explains that the Amendment to the FMP is prepared for the years 2012-2021, and its basis is a background map prepared as of 1.01.2012.

19. The Director of the RDSF, after analysing the opinion issued by the RDEP in Białystok (letter: WPN.611.38.GP of 18.01.2016) applied for issuing an opinion on increasing the timber harvest volume to 188,000 m³ which is the Amendment to the Białowieża Forest District Forest Management Plan for 2012-2021, which results from the developed Forecast and the application of the Forest Inspector of the Białowieża Forest District (letter case ref.: ZG.6005.1.2016 of 09.02.2016).

20. In response, the Director of the RDEP (letter WPN.611.38.2015.GP of 12.02.2016) issued a positive opinion on the documentation of the Amendment to the Forest Management Plan for the Białowieża Forest District for 2016-2021 along with the environmental impact forecast for the volume of 188,000 m³.

21. Coordination of the documentation of the Amendment to the FMP in the part regarding the buffer zone of the Białowieża National Park was sent by the Białowieża National Park (letter case ref. ZOP/07-075/67/2015 of 21.12.2015).

Following the above, the Director of the RDSF applied in writing for implementing the procedure of approval of the Amendment to the Forest Management Plan for the Białowieża Forest District (2012-2021).

Performing, under the applicable plan, the planned tasks as regards forest improvement, regeneration and sanitary fellings may be achieved only through increasing the timber harvest within 10 years from 63,471 m³ to 188,000 m³ .

Ad. 3 Public participation

During the work on developing the Amendment to the Białowieża Forest District FMP, public consultations were held.

The PIB, the announcement board of the RDSF in Białystok and the local press (Gazeta Współczesna) announced that as from 10 November 2015, for a period of 21 days, it would be possible to become familiar with the documentation of the annex to the forest management plan. The documents in question (Amendment to the Forest Management Plan for the Białowieża Forest District for 2012-2021) have been placed in the RDSF (official web-site, BIP) and made available at the seat of the Forest District.

The residents of the local community, environmental organizations, local government institutions could submit their comments and proposals by phone, by e-mail and by mail. The consultations were ended on 1 December 2015.

The comments and proposals submitted as part of the consultations of the Amendment to the Forest Management Plan for the Białowieża Forest District for 2012-2021

1. FRI Department of Natural Forests in Białowieża – *Manager Rafał Paluch*
2. Białowieża Geobotanical Station, University of Warsaw, Faculty of Biology – *Manager Bogdan Jaroszewicz*
3. Polish Society for Bird Protection in Białystok – *Secretariat Manager Roman Kalski*
4. Greenpeace CEE/Poland Warsaw – coordinator of the „Biodiversity” section *Magdalena Figura*
5. Workshop for All Beings Association in Bystra – *President Radosław Ślusarczyk*
6. Workshop for All Beings Association, Branch in Podlasie - *Adam Bohdan*, Wild Poland Foundation *Mariusz Duchewicz*
7. „Face of the Earth” Association, Jelenia Góra – *Albert Wiaderny*
8. Naturalists’ Club - Świebodzin – *President Robert Stańko*

9. State Council for Nature Conservation – Warsaw – *President Andrzej Kepel*
10. Natural Heritage Foundation – Bircza – *President of the Board Radosław Michalski*
11. WWF Poland Foundation – Warsaw – *Piotr Nieznański*
12. Greenmind Foundation – Warsaw
13. Tomasz Wesołowski – Manager of the Laboratory of Forest Biology, Wrocław University.
14. *Wiesław Walankiewicz* – Faculty of Zoology, Siedlce University of Natural Sciences and Humanities.
15. *Dorota Czeszczewik* - Faculty of Zoology, Siedlce University of Natural Sciences and Humanities.
16. Arkadiusz Szymura- „Sóweczka” Nature Tourism
17. Łukasz Synowiecki.
18. Maja Świątkowska - Wrocław
19. Marta Świłała – biologist - Katowice
20. Marek Jacel
21. Grzegorz Starzecki
22. Agnieszka Gołębiowska – forester
23. Adam Snopek.
24. Hanna Skowrońska
25. Białowieża National Park and BNP Scientific Board.
26. Committee on Nature Conservation of the Polish Academy of Sciences
27. Andrzej Sulej – no attachment.

On 9 December 2015, Mr. Jacek Czechowski sent an inquiry about the future of the Białowieża Forest, as he was concerned about the article/puszcza-bialoweska-jest-zagrozona/. The reply was provided on 22.12.2015.

The Naturalists' Club – Świebodzin – President Robert Stańko applied to the Director of the RDSF on 9 November 2015 and on 5 January 2016. Those applications were answered by the Director of the RDSF by letter ZS.6005.9.2015/2016 of 11.01.2016. After completing the consultations on the Amendment to the Forest Management Plan for the Białowieża Forest District, the following institutions sent their positions:

1. League for Nature Conservation – position on bark beetle in the Białowieża Forest.

2. The Council of the Faculty of Biology and Environmental Protection at the University of Silesia in Katowice – on the planned increase in tree cutting in the Białowieża Forest, adopted on 22 January 2016.
3. „MATECZNIK” Association for the Promotion of Biodiversity – application for taking necessary measures to urgently prepare and implement a decision leading to the inhibition of the outbreak of bark beetle which became an environmental disaster.
4. Institute of Dendrology at the Polish Academy of Sciences from Kórnik – Białowieża Forest – clash of reality with the ideology.

The Director of the RDSF in Białystok, as the competent authority to examine comments and proposals sent the written replies to the persons concerned (attached).

The Director of the Regional Directorate of State Forests in Białystok convened the Commission for the Amendment to the Forest Management Plan and its environmental impact forecast, with possible participation of the public in its debate. The announcement was made known to the public in the PIB and local press (Kurier Poranny) on 26.11.2015. The meeting of the Commission was held at the “Jagiellońskie” Forest Education Centre of the Białowieża Forest District on 07.12.2015. The Commission’s objective was to present the work on the annex to the FMP, including:

1. discussion of the outbreak of bark beetle and its impact on the implementation of the Białowieża Forest District FMP for 2012-2021,
2. presentation of the data regarding the documentation of the Amendment to the forest management plan, together with the impact forecast of the Amendment to the Forest Management Plan for the Białowieża Forest District on the environment and on Natura 2000 sites,
3. representation of an expert opinion by the FRI,
4. report on the course of the public consultations (shows who submitted comments and what topics they referred to) ,

After completing the presentations, a discussion was started (minutes attached).

In the Commission for the annex participated the representatives of local authorities, scientists, entrepreneurs, community of municipalities from the

area of the Białowieża Forest, scientific institutions, environmental organizations related to nature conservation and foresters.

The minutes on the meeting of the Commission for the Amendment to the Forest Management Plan for the Białowieża Forest District has been posted in the PIB of the RDSF Białystok in the tab "Forest management". Of this fact, the Director of the RDSF, by letter of 21.12.2015, informed all participants in the Commission in question. By letter of 21.12.2015. the Director of the RDSF thanked for the effort put into the analysis of the documentation of the Amendment to the FMP and the Forecast. He presented his position which was sent by e-mail to all the persons concerned on 22.12.2015.

Ad. 4 Results of the procedure concerning the transborder environmental impact, if it has been carried out.

The Act on EIA, Article 51(2)(1)(d) points to carrying out an analysis of the potential transboundary environmental impact assessment.

The southern and eastern areas of the Białowieża Forest District border with Belarus. The border forest districts are: Stoczek, Grudki and Podcerkiew. The direct forest border is about 21.7 km. Due to the application of shelterwood fellings and stepwise cuttings, in the border areas there is no threat to the sustainability of the forest and the induction of adverse environmental changes. The forest district does not afforest forest clearings. It is not planned to make any investments in this area which could result in the fragmentation of forest complexes.

We can conclude that refuges of large ungulates and predators remain intact, and contact between subpopulations is fully ensured. The implementation of the draft forest management plan will not result in the adverse transboundary environmental impact.

Ad. 5 Proposals regarding the methods and frequency of carrying out monitoring of the effects of implementing the provisions of the document.

Monitoring of carrying out the tasks referred to in the decision of the Minister of the Environment on approval of the Amendment to the Forest Management Plan is suggested by using the control system existing in the State Forests:

- Inspection of State Forests – what is controlled, is, *inter alia*, implementation of the forest management plan, proper implementation of breeding procedures, forest protection and nature conservation measures
- RDSF Control Department – carries out institutional controls to the extent indicated by the Director of the RDSF
- RDSF substantive departments – carry out problem controls and current control within their scope of activity.
- Forest district – carrying out the tasks of the forest management plan is controlled internally in each forest district, by the management of the unit. Forest management and natural phenomena in the forest district are monitored. Breeding and conservation activities are recorded in the State Forests IT System.

An objective measurement of implementing the Amendment to the FMP will include: analysis of types of carried out felling with respect to volume of timber harvesting contained in the plan, analysis species of tree introduced during regeneration when compared to compositions provided for in the plan, control of the period of conducted treatments in specific forest stands in relation to the date indicated in the plan or Forecast as optimal, change in the area of forests by functions performed, changes in the area of forest by category of use and specification of the forest improvement area by category of treatment.

Director

Att.: (file))

Opinions: RDEP, VSSI,

Comments on the draft plan

Replies of the Director of the RDEP in Białystok.

Minutes of the meeting of the Commission

Positions sent following the consultation of the Amendment to the FMP

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

The evaluation takes into account all forms of nature conservation established on the property and the positions and opinions of the local community and other stakeholders interested in the property in the context of the sustainable development of the region of Białowieża Forest.

The World Heritage Committee designated Białowieża Forest as “natural heritage”, since it recognised that the Forest met the criterion of integrity and another two criteria specified below.

Criterion IX. The property is an outstanding example representing significant ecological and biological processes in the evolution and development of ecosystems and communities of plants and animals.

Criterion X. The property contains the most important and significant natural habitats for in-situ conservation of biodiversity, including those containing threatened species of outstanding universal value from the point of view of science or conservation.

The whole area of the Białowieża Forest District is part of the European Ecological Network Natura 20000 – the Natura 2000 Site Białowieża Forest PLC200004 and the Protected Landscape Area Białowieża Forest. Within the Forest District, there are also 7 nature reserves with a total surface area of 4,305 ha. At the same time, with the Decision of the Director of Directorate General of the State Forests No. 52 of 31 March 2016 a reference area with a surface area of 4,137 ha (i.e. without the nature reserve located within it) was separated within the Białowieża Forest District. In this area, foresters’ operations were limited to the absolute minimum (no sanitary fellings are carried out there to remove spruce trees infested by bark beetles and only those trees that pose a danger for people or fire risk are felled and left on-site).

The possibilities of carrying out forest management operations are thus limited by a large number of provisions of local and general law, as well as the internal regulations of State Forests. This also applies to all the stands on wet and marshy habitats and in the protective zones of birds and plants, as well as those of trees older than 100 years (according to the so-called Wesołowski criterion). This means that both within the Białowieża Forest District and the entire area of Białowieża Forest forest management operations fully comply with the nature conservation regimes laid down for this area.

Therefore, it is very probable that the Białowieża Forest District will not implement the maximum allowable removal volume contained in the Amendment to the Forest Management Plan. It is not mandatory to fully implement the allowable removal volume in the Forest Management Plan, as this

cut is the maximum quantity of wood which the Forest District may harvest. The allowable cut which had been set at too low a level made it impossible to carry out operations which were necessary to protect the area and human safety. In contrast, the decision to approve the Amendment to the Forest Management Plan for the Białowieża Forest District enabled the execution of active conservation measures in areas where it was authorised and complied with the applicable principles of the conservation of the natural value of the property. However, the implementation of the allowable removal will depend on the real and dynamically changing needs of the conservation of forest stands and habitats.

In accordance with the procedure laid down in the Act of 3 October 2008 on the Provision of Information on the Environment and its Protection, Public Participation in Environmental Protection and Environmental Impact Assessments (Official Journal of the Laws of 2016, Item 353, as amended), a strategic environmental assessment of the draft document had been carried out before the Amendment to the Forest Management Plan was approved. In determining the scope and level of detail of the strategic environmental assessment of the Amendment to the Forest Management Plan for the Białowieża Forest District and in carrying it out, consideration was given to the situation of the Białowieża Forest District on the Natura 2000 Site Białowieża Forest and care was taken to ensure that the proposed operations would not cause a significantly adverse impact on the habitats and species which constituted the objects of conservation on this site. Just as much attention was paid to the assessment of the impact of the activities proposed to be performed on the universal value of the natural property of the Transboundary World Heritage Site Białowieża Forest. This was reflected in the agreed scope and level of detail of the environmental impact prognosis, among others, by identifying the need for an analysis and assessment of the state of the environment and the objectives of environmental protection laid down at the international, Community and national levels of importance from the point of view of the proposed document, as well as the ways of addressing these objectives and other environmental problems in the course of the preparation of the document. The need for an analysis of the expected environmental impacts was identified, including, in particular, the impacts on: biodiversity, animals, plants, land surface, landscape, climate, natural resources and monuments, taking into account the dependencies between these elements of the environment and between the impacts on these elements. An analysis was also performed to identify the potential changes in the state of the environment in case of failure to implement the draft Amendment to the Forest Management Plan for the Białowieża Forest District. All the above elements and the opinions of the local community and other stakeholders interested in the property were subjected to an in-depth analysis in the course of the strategic environmental assessment of the document. It was found that the strategic environmental assessment was carried out in a correct and exhaustive manner, also as regards the public participation in the procedure and the meeting of the criteria of the World Heritage Convention, i.e.: ensuring significant ecological and biological processes and significant natural habitats for conservation of biological diversity (please find enclosed

a summary of the strategic environmental assessment and the manner of considering the submitted comments).

The World Heritage Committee adopted its Statement of Outstanding Universal Value (OUV), indicating, among others, “the scale of its old growth forests, which include extensive undisturbed areas where natural processes are on-going. A consequence is the richness in dead wood, standing and on the ground, and consequently a high diversity of fungi and saproxylic invertebrates”.

The strategic environmental assessment indicated the need to leave dead trees on-site and prohibited the harvesting of dead or dying trees which were not infested by bark beetle. In addition, it limited the allowed removal of bark beetle-infested spruce trees to about 40% of the surface area of the Forest District. The authorisation of feelings in the other part of the Forest District was preceded, among other things, by the determination of the effects of changes on both the OUV and the objects of conservation on the Natura 2000 site. Given the volume of deadwood remaining in the Forest (1 million m³), the extent of the harvesting of bark beetle-infested spruce trees fully ensures living sites for both saproxylic invertebrates and birds and mammals using deadwood. The performance of possible works will by no means have an adverse effect on the species and habitats which are the objects of conservation on the Natura 2000 Site Białowieża Forest. It will have no impact, either, on the ecological and biological processes or on the coherence and integrity of the site. As part of the works envisaged in the Amendment to the Forest Management Plan, dead spruce wood in the area of the Białowieża Forest District will not be removed, except in situations posing a danger to public safety. Given that such a quantity of deadwood will be left on-site and no works will be carried out in the nature reserves, on wet and marshy habitats and in protective zones, the works proposed in the Amendment will not have a significant adverse impact on the particular elements of the natural environment and the processes unfolding in them. The internal coherence of the site, reflected e.g. in the behaviour of species-specific habitats, will be preserved.

In conclusion, it can be said that after an analysis of the situation and relevant documents it was found that the Amendment to the Forest Management Plan for the Białowieża Forest District would have a positive effect on the natural resources in the Forest District and, as a result, on the Outstanding Universal Value of the property, too. The purpose of the Amendment to the Forest Management Plan for the Białowieża Forest District is primarily to remove infested spruce trees in order to contain the bark beetle outbreak (involving the need for sanitary cuttings) and in order to ensure the continuity and good condition of the protected ecological processes and habitats of importance for maintaining the universal values of the natural heritage property. Indeed, the authorisation of active conservation measures makes it possible to prevent a substantial deterioration of the condition of certain valuable habitats and, thus, to maintain the biodiversity and integrity of the property referred to in the criteria under which Białowieża Forest was designated as “natural heritage”.



Draft ASSUMPTIONS
for the Integrated Management Plan for the Białowieża Forest
Transboundary World Heritage Site

The present Draft Assumptions for the Integrated Management Plan for the Białowieża Forest UNESCO Transboundary World Heritage Site (hereinafter referred to the “Management Plan”) are based on the results of the work of the Polish-Belarusian Working Group on the Białowieża Forest UNESCO Transboundary World Heritage Site, which was established as part of the of the Polish-Belarusian Committee for Cooperation in the Field of Environmental Protection.

The assumptions for the elaboration of the Integrated Management Plan for the Białowieża Forest World Heritage Site:

1. The following constitutes the Outstanding Universal Value of the property:

- The existence of Białowieża Forest as a property shaped by nature and the activities of the local communities, in which the natural processes have unfolded without an interruption in an inseparable relation to the active presence of the local communities;
- The preservation of all the forms of variability of the Białowieża landscape and forest characterised by a diversified species composition of trees, shrubs and herbs, environments and ecosystems, biocenoses and their elements (including, in particular, the richness of dead trees), and the unfolding ecological processes, including in connection with the participation of the local communities in them;
- Natural forests and restored forests with the features of natural forests;
- The presence of relict species related to natural forests and forests with the features of natural forests ;
- The free-living European bison population – a species restored in Białowieża Forest as a result of human activity and protected in-situ;
- Sustainable biodiversity use, including the culture of coexistence of the local population with nature, ensuring the presence of many rare and endangered species of fungi, plants and animals, as well as a whole complex of relationships among the particular elements of the ecosystem;

Marcin

[Signature]

- Ensuring the continuation of the natural ecological and biological processes and the favourable state of conservation and preservation of the communities and species which create the unique diversity of ecosystems. The richness and diversity of natural habitats represent a unique value as the necessary living grounds for many species typical of the natural forests of the moderate climate zone.

2. The Białowieża Forest World Heritage Site will always be a place where:

- The supreme management principle is the conservation of wild nature and respect for the exceptional network of relationships in ecosystems; old-growth forests with a natural character prevail in the stand structure;
- Research is carried out on natural processes and biodiversity and its results are made available to the interested institutions and persons;
- Access is allowed only under the principles supporting the natural values, while intensive tourism and recreation are shifted to the buffer zone;
- Humans live in harmony with nature, taking care of the natural environment and the level of ecological awareness is raised by continuous education;
- Biodiversity conservation accommodates the sustainable use of resources by local communities, in the context of the sustainable development of the Białowieża Forest region.

3. The basic objective of the management of the property is the preservation of natural processes and a unique combination of habitats and species. Old-growth forests are covered by strict conservation. The existing hydrological regime will be maintained, while the water ecosystems of artificial origin will be managed so as to preserve the existing plant and animal communities related to water habitats.

- **Nature conservation**

Conservation of old-growth forests

The basic principle of the management of the property is the conservation of natural processes in old-growth forests. Allowed activities include scientific research, education, limited and controlled tourist traffic, the maintenance of safety and capacity of traffic routes, the limitation of fire risk and the measures to reduce the bark beetle population and other pathogenic factors. Natural forest regeneration will be promoted and in justified cases supported by restocking with tree and shrub species originating from Białowieża Forest;



Species-specific conservation

The conservation will cover all the species protected under the national law and the species protected under European Directives and international conventions. No protective measures will be carried out in strict conservation areas;

Restrictions on exploitation

Wood harvesting and the control of the abundance of game animals are only related to the need to conserve habitats and to protect forests and do not result from economic objectives:

Conservation of river valleys and wetlands

Conservation of river valleys and wetlands will retain their present character. The areas which were transformed by human activities in the past and which are considered to be habitats with natural values will keep their open character as a result of such measures as mowing and the removal of seedlings;

Water regime

Water ecosystems of artificial origin will be managed in a manner ensuring the long-term survival of already developed plant communities and assemblages of aquatic and water-dependent animals. It will exclude their adverse impact on the groundwater levels in the ecosystems surrounding them. The main purpose of the measures will be to maintain the existing water regime. No work which can cause land drainage will be carried out. Relevant measures can be taken where it may be necessary to slow down the water outflow from the ecosystem;

Archaeological and historic sites

Archaeological sites and finds of historic importance will be preserved.

• **Research and inventories**

Research on natural processes and biodiversity

The basic objectives of research are considered to include: the exploration of natural phenomena, natural processes and elements of the ecosystems, as well as the identification of the impacts of different forms of human activity on nature and improved nature conservation methods. Studies on natural processes and biodiversity are regarded as priorities;

Research on rare and endangered species

Research and monitoring of rare and endangered species, particularly, species typical of natural forests and relict species, will be carried out. Support will be given to research on poorly known groups, mainly fungi and invertebrates;

Principles of scientific exploration

Handwritten signature

Handwritten signature

Scientific research and monitoring are carried out in accordance with the principles of scientific exploration applicable in both National Parks in Białowieża Forest, approved by their Scientific Councils. Each research application is submitted for opinion to the Scientific Council of a given park. Scientific experiments, particularly those that cause irreversible changes in the natural environment and natural processes or pose a threat to plants, fungi, animals and landscape of Białowieża Forest are inadmissible. In the areas outside the boundaries of the National Parks in Białowieża Forest, which are managed by the Białowieża, Browsk and Hajnówka Forest Districts, scientific work will be carried out in accordance with the applicable internal regulations of the State Forests National Forest Holding. In particular, in accordance with the regulations on the performance of research, information from the implementation of research is submitted to the Scientific and Social Council of the Białowieża Forest Promotion Complex. Joint scientific research will be carried out by Belarusian and Polish researchers.

Education

Development of education

A wide range of methods for educating different age groups is applied and developed. They are addressed to both local communities and visitors to the property. Education is considered to be an issue of key importance for better nature conservation not only in Białowieża but also in a wider context. The Forest Districts in Białowieża Forest implement education under 10-Year Programmes for Forest Education of Society;

Education and involvement of local communities

Training courses in nature conservation and environmental protection are organised. The effect of the education delivered is the improved awareness of the importance of natural and cultural values of the property, and thereby the approval of measures and restrictions applied in the area of Białowieża Forest by all the stakeholders, including the property managers, the local community and visitors.

- **Involvement of the local communities**

The local communities have been involved in the conservation of the property. In elaborating the Management Plan for Białowieża Forest and its later implementation, the property managers will take into account the needs and opinions of the communities living on the property or in its direct vicinity. This is important to elaborate a strategic plan for sustainable



development of the local communities in relation to the conservation of the World Heritage Site.

Compliance with the principles of picking undergrowth fruit

The harvesting of undergrowth fruit and mushrooms is allowed except in strict conservation areas. This makes it possible to maintain the ties of the local community with the forest and serves to emphasise non-production functions of the forest.

- **Tourism and recreation**

Access to strict conservation areas

The strict conservation areas in National Parks can be visited only on the designated tourist trails in groups not exceeding 20 persons and under the care of a guide;

Access to reserves

In accordance with the Regulation which established the reserve or the conservation plan.

Access to the property outside the strict conservation areas in the Białowieża National Park and in nature reserves

Tourists can move in accordance with the principles of access to forests (pursuant to the Forest Act and the Nature Conservation Act). A network of marked tourist trails has also been designated.

4. Existing and potential threats:

The following main threats to the Outstanding Universal Value of the property have been identified:

- Environmental disasters, including the threat posed by large-area fires or outbreaks (excessive abundance) of insects.
- The extinction and isolation of the populations of many species (e.g. thermophilous and boreal ones) related to the decline of internal recolonisation sources, shaped by natural disturbances in forest ecosystems, which do not function correctly under the conditions of the too small area of Białowieża Forest;
- Changes in the water regime (the lowering of the groundwater level, the vanishing of small water ponds, periodic drying out of lesser watercourses);
- A deteriorating health condition of the European bison, caused, among others, by a high coefficient of inbreeding and the emergence of new diseases and parasites;

Martyna

Glavin

- The regression of habitats existing on poor soils caused by growing soil fertility;
- The emergence and spread of alien and invasive species;
- The potential uncontrolled development of tourist infrastructure in the surroundings of the property;

5. Prevention of disasters

The main threats with disastrous consequences for the property include the risk of occurrence of:

- a large-area fire, which implies the need to maintain a road network providing access to areas at risk. The roads without strategic importance for the safety of the property will not be maintained;
- large-area insect outbreaks, which implies the need to carry out monitoring and active conservation measures.

Detailed information on the prevention and response to the outbreak of a fire or an insect outbreak will be provided in the relevant planning documents referring to the individual parts of the property.

6. Buffer zone

A buffer zone is needed to maintain the Outstanding Universal Value of the property. In the buffer zone, support will be given to measures related to renaturalisation of the transformed ecosystems, education, tourism, the promotion of the property, the sustaining of local traditions, environment-friendly farming and the sustainable development of the Białowieża Forest region.

The measures in the buffer zones of the property situated within the boundaries of both States will be defined in the Management Plan for the property.

7. Transboundary cooperation

Transboundary cooperation will be continued in the form of an exchange of correspondence, mutual visits to the area of the property and active cooperation within the Polish–Belarusian Working Group on the Białowieża Forest UNESCO Transboundary World Heritage Site.

The Polish–Belarusian Working Group on the Białowieża Forest UNESCO Transboundary World Heritage Site (hereinafter referred to as the “Working Group”)




- The Working Group operates as part of the Polish-Belarusian Committee for Cooperation in the Field of Environmental Protection,
- Persons who are not members of the Working Group can be invited to meetings (depending on the needs);
- The competence of the Working Group includes the issues related to:
 - the conservation of the Outstanding Universal Value of the property,
 - management,
 - monitoring of the World Heritage Site and its buffer zone;

The problems related to the functioning of the property as a homogeneous natural ecosystem are addressed at the forum of the Working Group. Moreover, consideration is given to the emerging threats and there is an exchange of information on natural processes, natural phenomena and planned measures — the purposefulness of their implementation and the effectiveness of the methods applied.

8. Implementation programme

The Integrated Management Plan for the Białowieża Forest World Heritage Site will be drafted as part of the work of the Polish–Belarusian Working Group on the Białowieża Forest UNESCO Transboundary World Heritage Site, to be approved by the State Parties and submitted to the UNESCO World Heritage Centre.

The preparation of a consistent Management Plan for the area of Białowieża Forest involves quite complex challenges and the launch of any measures requires a rational approach, responding to the need to reach a consensus, based on both relevant knowledge and the necessity of carrying out consultations with the public.

It should be borne in mind that Białowieża Forest is also perceived as the cultural heritage of the local population. Traces of human activity can be found even in as much as 90% of the surface area of the Forest. The use of the Forest, including e.g. planting, cutting, forest bee-hiving or the ordinary picking of mushrooms or forest fruit, is a right inherited from ancestors and, at the same time, a commitment to preserve it in order keep it in an equilibrium for the future generations. It was exactly this culture of human coexistence with the environment that enabled the Forest to survive over the centuries. “When in 2014 Poland and Belarus submitted their common application for conservation under the UNESCO Convention to cover the whole of Białowieża Forest, nobody asked the local governments in the area of Białowieża Forest for consent to such a decision and the resulting restrictions and lost benefits which affected the local residents. No public consultations were carried out on the proposal for the conservation

~~Handwritten signature~~

Handwritten signature

to be extended to the managed part of the Forest” (a quotation from a letter from local governments).

In consequence, the process of public consultations can even take several years, just as in the case of the planning documents for the Białowieża National Park or the Białowieża Forest Natura 2000 Site, where the necessary period for the preparation and consultations lasted from 4 to 5 years. Therefore, the actions to be launched will need time and will successively implement the predetermined objectives. The Białowieża Forest UNESCO World Heritage Site is a transboundary property with international importance and changes to its management will require a balanced approach and consultations between the State Parties.

It is expected that it will take 2 to 3 years to prepare the Management Plan, given the fact that in the Polish part of the property there are different forms of nature conservation, with some of them overlapping. Another 2 years will be necessary for public consultations. There are relevant planning documents for all the forms of nature conservation which provide for specific implementation deadlines, on the basis of which conservation tasks are carried out. It will be necessary to verify the existing planning documents and to hold consultations with all the stakeholders.



Igor Kachanovskiy

**Deputy Minister of Natural Resources
and Environmental Protection of the
Republic of Belarus**



Andrzej Konieczny

**Podsekretarz Stanu
w Ministerstwie Środowiska
Rzeczypospolitej Polskiej**

Kamieniuki, Republic of Belarus, 19 January 2017

The comments and proposals	Submitter	Issues – answer, method of examination
<p>The comments and proposals submitted during the public consultations carried out by the RDSF from 10 November to 1 December 2015 on the documentation of the Amendment to the Forest Management Plan of the Białowieża Forest District for 2012-2021.</p>		
<p>A negative impact of increased harvesting on the protected species (owls, woodpeckers, birds of prey)</p>	<p>Marta Światała, Msc, biologist, ornithologist</p>	<p>The scale of the ongoing outbreak of bark beetle is much greater than all existing, documented outbreaks in the Białowieża Forest. The lack of any reaction to the infestation of a large number of spruces in the years 2012-2015, together with the weather conditions conducive to the development of the bark beetle population in the years 2014-2015 resulted in a dramatic increase in the number of dying and dead trees. This results in a significant increase in the mass of dead wood in the ecosystem within a very short time. The procedure in a situation of the increasing outbreak of this species is a subject of many studies, however, the results of various studies give various indications and recommendations. Undisputable is the fact that in the State Forests the Act on forests of 28 September 1991 shall apply, which imposes on forest inspectors specific tasks and procedures should any threat to the sustainability of forest stands appear (Article 9(1)). According to the RDEP opinion, elimination of outbreak foci of bark beetle is advisable in the protection zones for birds of prey and black stork due to the conservation objective.</p>
<p>The presence of dead wood positively affects many species which are the subjects of conservation in the Białowieża Forest Natura 2000 site</p>	<p>Marta Światała, Msc, biologist, ornithologist</p>	<p>We are aware of the functions played by dead wood in the ecosystem. Currently, in the Forest there are large quantities of dead wood which provides appropriate conditions for the development of many species being the subjects of conservation in the Białowieża Forest Natura 2000 site. This quantity has grown significantly over the past few years. The planned activities are not intended to reduce the amount of dead biomass. The conservation objective should be to maintain the population in the proper condition. The index of the quantity of dead wood in the Białowieża Forest exceeds the standards established by the auditors of the FSC and PEFC certification.</p>

<p>A threat posed by activities in the protection zones</p>	<p>Marta Światała, Msc, biologist, ornithologist</p>	<p>In fact, the provisions of the approved CTP block a possibility of carrying out the activities planned in the annex. Approval of the Amendment to the FMP does not release the Forest District from following the procedures applicable so far, including notifying to the RDEP the data on any removed trees posing a threat to public safety and obtaining a permission to carry out any activities in the designated protection zones. Any intervention in the protection zones will be preceded by a detailed analysis of the need to perform any treatment and its potential impact on the subject of conservation. Unfortunately, practice shows that ceasing the activities also in the protection zones may result in deteriorating the living conditions of the species being the subjects of conservation. This situation occurs especially in a situation where the majority of trees, surrounding a nest (or site) and being a natural shelter for it, die, which results in a significant change in habitat conditions – what changes is the level of insolation, humidity of the microhabitat, exposure to wind gusts and exposure to the pressure of predators.</p>
<p>In the CTP, felling of tree stands older than 100 years was considered a threat to habitats and species</p>	<p>Marta Światała, Msc, biologist, ornithologist</p>	<p>Treatments with regard to trees older than 100 years (according to Wesołowski), as planned in the Amendment to the FMP, result mainly from a need to ensure the sustainability of forest stands and public safety. The need to remove all dead trees growing along the roads, tourist trails and other places where people stay in the territory of the Białowieża Forest results from the responsibility of the site managers for guaranteeing public safety, which is not taken into account in the CTP for the Białowieża Forest Natura 2000 site. It is also necessary to take into account the fact of compensation incurred by the Forest District for damage to health or property due to fallen trees. Therefore, the claims of potential victims will finally charge the State Treasury.</p>
<p>Leaving hollow trees in tree stands</p>	<p>Marta Światała, Msc, biologist, ornithologist</p>	<p>In accordance with the Forest Protection Instruction, biocenotic trees, including hollow trees, are left in forest stands. This rule is and will be respected in carrying out any treatments.</p>
<p>The annex violates the provisions of the CTP and the</p>	<p>Prof. Zbigniew Mirek</p>	<p>In fact, the provisions of the approved CTP block a possibility of carrying out the activities planned in the annex. The RDSF in Białystok and the</p>

<p>implementation of the annex may lead to a threat of removing the Białowieża Forest from the UNESCO World Heritage list</p>	<p>Committee on Nature Conservation of the Polish Academy of Sciences</p>	<p>Białowieża Forest District have taken activities to repeal the Ordinance of the Regional Director of Environmental Protection in Białystok of 6 November 2015 on establishing the conservation tasks plan for the Białowieża Forest Natura 2000 site, claiming that this ordinance violates the legal interest of the State Treasury property manager – SF NFH, Białowieża Forest District. Poland has committed before the UNESCO to cover the oldest forest stands in the Białowieża Forest, referred to as forest stands older than 100 years and pioneer forest stands, with special protection. The provisions contained in the documents submitted to the World Heritage Centre reflect the situation of 2013, when the FMP was already applicable and all forest stands older than 100 years were formally excluded from use. Back then, a commitment was made to comply with the provisions of the FMP. Along with submitting the application for the annex, the Forest Inspector applied for reviewing the provisions of the “road map” which did not include the disastrous outbreak.</p>
<p>The expert opinion does not take into account the following documents: CTP and commitments resulting from the entry of the Białowieża Forest into the UNESCO World Heritage list.</p>	<p>Bogdan Jaroszewicz, Ph. D, Białowieża Geobotanical Station</p>	<p>In fact, the provisions of the approved CTP block a possibility of carrying out the activities planned in the annex. The RDSF in Białystok and the Białowieża Forest District have taken activities to repeal the Ordinance of the Regional Director of Environmental Protection in Białystok of 6 November 2015 on establishing the conservation tasks plan for the Białowieża Forest Natura 2000 site, claiming that this ordinance violates the legal interest of the State Treasury property manager.</p>
<p>Fragmentation of the area in which activities will be taken is so high, and the resource of bark beetle in the forest is so large, that the undertaken activities will not reduce the size of the outbreak of bark beetle which will disappear</p>	<p>Bogdan Jaroszewicz, Ph. D, Białowieża Geobotanical Station</p>	<p>In the State Forests, the Act on forests of 28 September 1991 shall apply, which imposes on forest inspectors specific tasks and procedures should any threat to the sustainability of forest stands appear (Article 9(1), Article 35). The SF NFH managing the State Treasury property, bound by the Forest Protection Instruction to care for the sanitary condition and by the Act of forests to conduct sustainable forest management aimed at enlarging forest resources and following the principle of sustainability and protection of forests cannot accept this option of activity.</p>

spontaneously as a result of the environmental resistance.		
The annex should contain only treatments aimed at reducing bark beetle, any other "breeding and protection" treatments should be moved to the next decade. The map of damaged tree stands does not correspond to the maps of the locations of planned fellings.	Bogdan Jaroszewicz, Ph. D, Białowieża Geobotanical Station	Carrying out sanitary fellings and taking care of the sanitary condition results from the Forest Protection Instruction. This is the duty of each forest inspector. It is not possible to give up breeding treatments - CP-P, TWP, TPP in forest stands requiring this. The need to carry out a treatment, its intensity must be specified on-site. In some cases, forest stands require even two fellings. A failure to carry out breeding and protection treatments with regard to forest stands interferes with or even makes it impossible to achieve the breeding objective.
In all forest habitat types, it is necessary to minimise the percentage of spruce in the planned species compositions of artificial regenerations and to strive for the full use of natural forest regeneration.	Bogdan Jaroszewicz, Ph. D, Białowieża Geobotanical Station	Striving for the maximum use of natural regenerations is correct and such activities are a priority. Natural regeneration results from the forest breeding policy and is preferred in the first place. Species composition of artificial regenerations are set out in the forest management plan and result from the forest habitat types and phytosociological studies. It is possible to modify the growing share of spruce.
A request to suspend planning of fellings in nature habitats, with the exception of thermophilic oak trees.	Bogdan Jaroszewicz, Ph. D, Białowieża Geobotanical Station	The methodological manual of the protection of Natura 2000 habitats and species does not prohibit felling of fully occupied spruces.
No justification for fellings planned in tree stands, in which spruce is not the dominant species.	Bogdan Jaroszewicz, Ph. D, Białowieża Geobotanical Station	Sanitary fellings do not rule out an obligation to carry out planned breeding and protection treatments. It is not possible to give up breeding treatments - CP-P, TWP, TPP in forest stands requiring this. The need to carry out a treatment, its intensity must be specified on-site. In some cases, forest stands require even two fellings. A failure to carry out breeding and protection treatments with regard to forest stands interferes with or even makes it impossible to achieve the breeding objective.
"Forecast" – change the rating of the effects of implementing	Bogdan Jaroszewicz, Ph. D,	The effects of implementing the annex have been rated by the experts (BFMG, Branch in Białystok)

the planned annex into negative	Białowieża Geobotanical Station	
Change Table 1 and Table 2 taking into account the threats posed by the planned activities to the subjects of conservation in the Natura 2000 site	Bogdan Jaroszewicz, Ph. D, Białowieża Geobotanical Station	The tables in question have been developed by the experts (BFMG, Branch in Białystok)
The Forecast must be supplemented by the rating of the impact of the planned annex on the subjects of conservation in the Natura 2000 site and on the conservation status of the Exceptional Universal Value of the UNESCO World Heritage Site.	Bogdan Jaroszewicz, Ph. D, Białowieża Geobotanical Station	The contractor supplemented the Forecast.
Modify the provisions of the "Expert opinion..." and of the "Forecast..." so as to maintain the "precautionary principle"	Bogdan Jaroszewicz, Ph. D, Białowieża Geobotanical Station	The documentation for the application for the annex has been prepared by the experts (BFMG, Branch in Białystok).
Non-compliance with the applicable Act of local law – CTP	Naturalists' Club	In fact, the provisions of the approved CTP block a possibility of carrying out the activities planned in the annex. The RDSF in Białystok and the Białowieża Forest District have taken activities to repeal the Ordinance of the Regional Director of Environmental Protection in Białystok of 6 November 2015 on establishing the conservation tasks plan for the Białowieża Forest Natura 2000 site, claiming that this ordinance violates the legal interest of the State Treasury property manager.
Planned harvesting exceeds the forecast maximum mass of spruces fully occupied by bark beetle	Naturalists' Club	Apart from sanitation fellings, planned breeding and protection treatments will be carried out which have not been carried out in accordance with the currently applicable FMP. Carrying out sanitation fellings in the first place, with the restrictions related to the determined allowable cut, did not allow

		to carry out breeding and protection fellings in the approved plan as obligatory.
Planned intermediate and final fellings will apply to trees which are already dead and not just to “infested” trees. The effect of the planned activities on reducing the current outbreak will not necessarily be significant.	Naturalists’ Club	Planned fellings apply only to fully occupied trees. In accordance with the Forest Protection Team (FPT) in Olsztyn, there is an urgent need to organise forest stands with spruce which is fully occupied (bark beetle larva and even eggs under the bark). Since May 2016, it has been absolutely necessary to designate infested trees which are to be removed from the forest until bark beetle pupae appear under the bark. The current lack of activities led to the much greater range and size of the disturbance. Dead trees will be removed only for the purposes of safety and will be left to decompose naturally in the ecosystem. In accordance with the Forest Protection Instruction, in order to protect the biological diversity, wood of dead trees at various stages of decomposition should be left in the forest.
Fellings were also planned in tree stands where spruce is not dominant. Also, it was not reserved that the subject of fellings is to be the spruce only. The size of planned fellings is several times larger than the size of damage made to tree stands by bark beetle.	Naturalists’ Club	Planned fellings apply only to fully occupied trees. Dead trees, if they are to be removed, will remain to decompose naturally in the ecosystem. In accordance with the Forest Protection Instruction, in order to protect the biological diversity, wood of dead trees at various stages of decomposition should be left in the forest. Sanitation fellings shall not rule out an obligation to carry out planned breeding and protection treatments. It is not possible to give up breeding treatments - CP-P, TWP, TPP in forest stands requiring this. The need to carry out a treatment, its intensity must be specified on-site. In some cases, forest stands require even two fellings. A failure to carry out breeding and protection treatments with regard to forest stands interferes with or even makes it impossible to achieve the breeding objective.

<p>Non-compliance with the applicable Act of local law – CTP Consultations are useless, in accordance with the provision of the expert opinion “after approving the CTP, modify the management activities provided for in the expert opinion on the annex to the plan, so that they are not in contradiction with the CTP”</p>	<p>„Sóweczka” Tourism</p> <p>Nature</p>	<p>In fact, the provisions of the approved CTP block a possibility of carrying out the activities planned in the annex. The RDSF in Białystok and the Białowieża Forest District have taken activities to repeal the Ordinance of the Regional Director of Environmental Protection in Białystok of 6 November 2015 on establishing the conservation tasks plan for the Białowieża Forest Natura 2000 site, claiming that this ordinance violates the legal interest of the State Treasury property manager.</p>
<p>White-backed woodpecker also feeds on dying spruces. The removal of these trees will have a negative impact on the population of this species.</p>	<p>„Sóweczka” Tourism</p> <p>Nature</p>	<p>White-backed woodpecker also feeds on dying spruces.</p>
<p>Non-compliance with the provisions of the application enlarging the world heritage site Change in the rules of management in the World Heritage Site may result in removing the entire site (administered by 3 managers) from the World Heritage List</p>	<p>„Sóweczka” Tourism</p> <p>Nature</p>	<p>Poland has committed before the UNESCO to cover the oldest forest stands in the Białowieża Forest, referred to as forest stands older than 100 years and pioneer forest stands, with special protection. The provisions contained in the documents submitted to the World Heritage Centre reflect the situation of 2013, when the FMP was already applicable and all forest stands older than 100 years were formally excluded from use. Back then, a commitment was made to comply with the provisions of the FMP. The application to the UNESCO contained the general indications while the specific action plan will be developed in the site management plan. Along with submitting the application for the annex, the Forest Inspector applied for reviewing the provisions of the “road map” which did not include the disastrous outbreak.</p>

<p>A request to exclude the tree stand 494Cd from use – research area</p>	<p>FRI Department of Natural Forests</p>	<p>The comment accepted, fellings will not be carried out in the forest stand 494Cd.</p>
<p>The FMP for 2012-2021 in its original form is a reasonable compromise and should remain unchanged. Planned activities call into question the competence of the SF as regards managing the common heritage of the Białowieża Forest</p>	<p>Grzegorz Starzecki</p>	<p>The FMP of 2012 did not include the disastrous outbreak what led to the destabilization of forest stands with spruce in a large area. The amount of wood to harvest results directly from the condition of forest stands affected by the disaster. The words “management greed” are mutually exclusive. In the outbreak, there is no room for greed. The protection of the Białowieża Forest ecosystems is a superior good. This is evidenced by the number of protected objects and unique breeding and protection activities in this area. The objective of the activities resulting from the Amendment to the FMP is to stop the decline of spruce stands, by reducing the bark beetle population.</p>
<p>In the light of the scientific studies, removing trees attacked by bark beetle has no significant impact on the course of the outbreak, and brings serious damage in natural terms. The ineffectiveness of the fight against bark beetle in the situation of significant areas covered by passive protection (nature reserves, BNP)</p>	<p>State Council for Nature Conservation</p>	<p>It should be concluded that there are no conclusive studies on the course of the outbreak of bark beetle in natural ecosystems, where no protection measures are taken. Recently, the Białowieża Forest has become such a testing ground. From the observations carried out for decades, especially as regards the previous periods of the outbreak of bark beetle in the Forest, in comparison to the present outbreak it results that, however, there is a possibility of the effective fight and previous outbreaks were efficiently reduced. Declines of forest stands were not as large as they are now and the number of selected trees was much lower. In their statements, many supporters of passive protection deny the view that the areas under conservation are a “breeding ground” of bark beetle. There is no scientific proof that the presence of nature reserves is conducive to the spread of bark beetle in the complex. Hence, the comment is groundless, because in the light of the above, this number of nature reserves should not reduce the effectiveness of rescue operations.</p>
<p>Non-compliance with the applicable Act of local law – CTP</p>	<p>State Council for Nature Conservation</p>	<p>In fact, the provisions of the approved CTP block a possibility of carrying out the activities planned in the annex. The RDSF in Białystok and the Białowieża Forest District have taken activities to repeal the Ordinance of the Regional Director of Environmental Protection in Białystok of 6</p>

		November 2015 on establishing the conservation tasks plan for the Białowieża Forest Natura 2000 site, claiming that this ordinance violates the legal interest of the State Treasury property manager.
Non-compliance with the provisions of the application enlarging the world heritage site, the Convention for the protection of biological diversity, the Birds and Habitats Directives.	State Council for Nature Conservation	Poland has committed before the UNESCO to cover the oldest forest stands in the Białowieża Forest, referred to as forest stands older than 100 years and pioneer forest stands, with special protection. The provisions contained in the documents submitted to the World Heritage Centre reflect the situation of 2013, when the FMP was already applicable and all forest stands older than 100 years were formally excluded from use. Back then, a commitment was made to comply with the provisions of the FMP. The application to the UNESCO contained the general indications while the specific action plan will be developed in the site management plan. Along with submitting the application for the annex, the Forest Inspector applied for reviewing the provisions of the “road map” which did not include the disastrous outbreak. The application to the UNESCO contained the general indications while the specific action plan will be developed in the site management plan
A postulate to provide the permanent conservation status of the Białowieża Forest	State Council for Nature Conservation	The recommendation goes beyond the competence of the Director of the RDSF.
The methodology to evaluate individual parameters of the environment and the impact of the plan on these parameters is based on expertise and not on the most recent scientific papers	Polish Society for Bird Protection (PSBP)	The document was based on expertise of the Contractor. The comment was provided to the Contractor.

<p>Massive bark beetle outbreaks are natural phenomena related to climate change No real effect of the planned activities on the course of the outbreak</p>	<p>PSBP</p>	<p>It should be stressed that in the area where spruces are currently fully occupied, Eurasian three-toed woodpecker has excellent conditions while in the place where several tens of hectares of the forest died, this species does not have favorable conditions. The activities consisting in reducing the outbreak are intended to slow down the process of the fast decline of forest stands and thus to preserve the habitat. Hence, there is a reasonable risk that the further unrestrained development of the outbreak may significantly reduce the share of older spruce trees in the Forest, and thus significantly deteriorate the habitat conditions of this woodpecker. The similar situation applies to white-backed woodpecker which is observed on spruces. This behavior shows that this species adapted to the situation of the mass decline of forest stands and uses the rich resource of bark beetle. The planned activities would not eliminate the habitat of this woodpecker, as there are no plans to remove deciduous forest stands which constitute the essential habitat of white-backed woodpecker.</p> <p>The Act on forests and the Forest Protection Instruction impose on the forest inspector an obligation to take actions (Articles 9, 35 of the Act on forests and § 4 of the FPI). In the RDSF in Białystok, the outbreak occurred only in the Białowieża Forest. The uncontrolled outbreak process led to dying of spruce stands, their decline and degradation of natural habitats. It should also be noted that the current fight against bark beetle has proven to be effective, and the decline of forest stands was by far smaller than it is now, in the absence of protection activities.</p>
<p>Non-compliance with the applicable Act of local law - CTP</p>	<p>PSBP</p>	<p>In fact, the provisions of the approved CTP block a possibility of carrying out the activities planned in the annex. The RDSF in Białystok and the Białowieża Forest District have taken activities to repeal the Ordinance of the Regional Director of Environmental Protection in Białystok of 6 November 2015 on establishing the conservation tasks plan for the Białowieża Forest Natura 2000 site, claiming that this ordinance violates the legal interest of the State Treasury property manager.</p>

Despite the eightfold increase in harvesting, it was considered that the provisions concerning the impact on Natura 2000 sites do not need to be updated.	PSBP	The priority is to remove fully occupied spruces.
The table of the impact of management treatments is inconsistent	PSBP	The Contractor has made adjustments.
Non-compliance with the applicable Act of local law - CTP; Non-compliance with the provisions of the application enlarging the world heritage site	Prof. Tomasz Wesółowski	In fact, the provisions of the approved CTP block a possibility of carrying out the activities planned in the annex. The RDSF in Białystok and the Białowieża Forest District have taken activities to repeal the Ordinance of the Regional Director of Environmental Protection in Białystok of 6 November 2015 on establishing the conservation tasks plan for the Białowieża Forest Natura 2000 site, claiming that this ordinance violates the legal interest of the State Treasury property manager.
Removal, in a short period of time, of thousands of trees will fundamentally deteriorate the living conditions of all specialised species inside old forests.	Prof. Tomasz Wesółowski	The author clearly indicates his opinion that supposedly only the protection of processes taking place in ecosystems would be an effective tool to protect the biodiversity. According to the SF, large-scale disturbances in these naturally valuable ecosystems may result in significant, negative phenomena in the area of the Forest. So far, the fight against bark beetle, however, has brought positive effects, through the definitely smaller scale of the outbreaks since 1992. Thanks to the active protection, many valuable forest stands have been preserved which are currently at risk of declining. Although at the moment there are good conditions there for a narrow, selected group of species, in a longer term a serious threat to the sustainability of their habitats may appear. So, it is necessary to take activities to minimize this risk.
Non-compliance with the applicable Act of local law-CTP; Non-compliance with the provisions of the application	Dr Dorota Czeszczewik	In fact, the provisions of the approved CTP block a possibility of carrying out the activities planned in the annex. The RDSF in Białystok and the Białowieża Forest District have taken activities to repeal the Ordinance of the Regional Director of Environmental Protection in Białystok of 6

<p>enlarging the world heritage site</p>		<p>November 2015 on establishing the conservation tasks plan for the Białowieża Forest Natura 2000 site, claiming that this ordinance violates the legal interest of the State Treasury property manager.</p>
<p>Harvesting will shatter the existing efforts to recover the Diploma of the Council of Europe by the BNP (we lost that diploma due to the lack of protection of old tree stands growing outside the BNP)</p>	<p>Dr Dorota Czeszczewik</p>	<p>The decision to recover the Diploma is dependent on an evaluation by independent experts.</p>
<p>The team of experts appointed in 2006 by President of the Republic of Poland, L. Kaczyński, determined the average annual wood harvesting volume at the level of 30,000 m³ (which corresponds to the fuel-related needs the local community), while it is planned to exceed this value by several times.</p>	<p>Dr. Dorota Czeszczewik</p>	<p>The value determined by the team has not been accepted by all team members. Since the moment on which the FMP 2012-2021 entered into force in the Białowieża Forest District, bark beetle has fully occupied the total volume of spruces amounting to more than 320 thousand m³. Therefore, this argument has become outdated. An attempt to reduce the bark beetle population may not be linked with the quantity of wood to be harvested. Effective activities are judged by their effect, and not by the number of cubic metres.</p>
<p>Carrying out in such naturally valuable site as the Białowieża Forest of clear fellings which have been abandoned long time ago in other forests. Many "nature" species will be affected (e.g. Eurasian three-toed woodpecker, white-backed woodpecker, red-breasted flycatcher, collared flycatcher, saproxylic insects).</p>	<p>Dr Dorota Czeszczewik</p>	<p>The Act on forests imposes on the forest inspector an obligation to take measures (Articles 9, 35). According to the "Forest Protection Instruction", biocenotic, including hollow, trees are left in the forest stand. This rule is and will be respected in carrying out all treatments. Natural processes in a form of natural regenerations are always preferred by the SF NFH. The outbreak of bark beetle should not be considered a natural process but only the extraordinary development of damage on the part of biotic factors.</p>

<p>Such activities are thus inconsistent with Polish and EU law relating to the species protection of animals and plants and their habitats. So, there is no environmental justification for interference in natural processes taking place in the Forest as carrying out planned fellings will destroy the appropriate forest structure conducive to the high biodiversity.</p>		
<p>The plan is very harmful to the ecosystem of the Forest. It deprives it of old trees and is a threat to many species of animals. The plan should not be implemented.</p>	<p>Maja Świątkowska</p>	<p>The comment is too general. The arguments are not supported by any facts.</p>
<p>The study should be rejected in its entirety, since it does not include the CTP for the Natura 2000 site, does not take into account the special status of the Forest as the Transboundary World Heritage Site and the consequences of having entered the whole Forest into the UNESCO list.</p>	<p>WWF Poland</p>	<p>In fact, the provisions of the approved CTP block a possibility of carrying out the activities planned in the annex. The RDSF in Białystok and the Białowieża Forest District have taken activities to repeal the Ordinance of the Regional Director of Environmental Protection in Białystok of 6 November 2015 on establishing the conservation tasks plan for the Białowieża Forest Natura 2000 site, claiming that this ordinance violates the legal interest of the State Treasury property manager.</p>
<p>Unclear procedure of selecting the area to be inspected</p>	<p>WWF Poland</p>	<p>The Deputy Director of the RDSF has approved the methodology to assess the situation.</p>

<p>It is necessary to stop any final fellings in the Forest District, until the annex to the FMP is established, in connection with exceeding the allowable final and intermediate fellings.</p>	<p>WWF Poland</p>	<p>Allowable final and intermediate fellings were not exceeded. There was an error in the study, an erratum was placed on the PIB website of the RDSF in Białystok.</p>
<p>Previously planned fellings should be moved to the next ten-year period</p>	<p>WWF Poland has committed before the UNESCO to cover the oldest tree stands in the Białowieża Forest, referred to as tree stands older than 100 years and pioneer tree stands, with special protection. The provisions contained in the documents submitted to the World Heritage Centre reflect the situation of 2013, when the FMP was already applicable and all tree stands older than 100 years were formally excluded from use. Back then, a commitment was made to comply with the provisions of the FMP. The application to the UNESCO contained the general indications while the specific action plan</p>	<p>Sanitation fellings do not rule out an obligation to carry out planned breeding and protection treatments. It is not possible to give up breeding treatments - CP-P, TWP, TPP in forest stands requiring this. The need to carry out a treatment, its intensity must be specified on-site. In some cases, forest stands require even two fellings. A failure to carry out breeding and protection treatments with regard to forest stands interferes with or even makes it impossible to achieve the breeding objective.</p>

	<p>will be developed in the site management plan. Along with submitting the application for the annex, the Forest Inspector applied for reviewing the provisions of the “road map” which did not include the disastrous outbreak.</p> <p>Poland has committed before the UNESCO to cover the oldest tree stands in the Białowieża Forest, referred to as tree stands older than 100 years and pioneer tree stands, with special protection. The provisions contained in the documents submitted to the World Heritage Centre reflect the situation of 2013, when the FMP was already applicable and all tree stands older than 100 years were formally excluded from use. Back then, a commitment was made to comply with the provisions of the FMP.</p>	
--	--	--

	<p>The application to the UNESCO contained the general indications while the specific action plan will be developed in the site management plan. Along with submitting the application for the annex, the Forest Inspector applied for reviewing the provisions of the “road map” which did not include the disastrous outbreak.</p>	
<p>There is no need to carry out fellings in protection forests, as this changes their status and function.</p>	<p>WWF Poland</p>	<p>In the State Forests the Act on forests of 28 September 1991 shall apply, which imposes on forest inspectors specific tasks and procedures should any threat to the sustainability of forest stands appear (Article 9(1), Article 35). Carrying out fellings will not change the function of the protection forest.</p>
<p>Reduce planned final and intermediate fellings to the level justified by real breeding and protection needs</p>	<p>WWF Poland</p>	<p>Original final and intermediate fellings were planned in accordance with the findings of the Plan Objectives Committee and with the guidelines of the Ministry of the Environment and GDSF. Sanitation fellings planned in the annex apply to infested spruces in forest stands with spruce or in spruce stands. Snag will be removed due to surface regeneration, public safety in the transport and tourist trails and occupational safety.</p>
<p>Remove from the plan treatments planned in tree stands older than 100 years and those older than 60 years in case of pioneer species, in refuges of animals of protected species, in tree stands growing</p>	<p>WWF Poland</p>	<p>This provision was applicable in the current forest management plan. This led to the outbreak. Removal of infested spruces will take place in accordance with the recommendation of the FPT. In the State Forests, the Act on forests of 28 September 1991 shall apply, which imposes on forest inspectors specific tasks and procedures should any threat to the sustainability of forest stands appear (Article 9(1), Article 35).</p>

on hydrogenic habitats and constituting priority habitats of Natura 2000		
In the territory of the entire Forest District, planned species compositions of regeneration should be modified towards their natural species composition. It should also be recommended to minimise the percentage of spruce in plantings in the majority of Habitat Forest Types	WWF Poland	The plan is consistent with the Forest Breeding Rules. Natural regeneration results from the forest breeding policy and is preferred in the first place. Species composition of artificial regenerations are set out in the forest management plan and result from the forest habitat types and phytosociological studies.
The expert opinion should be supplemented by a map or a list of tree stands, which, in the authors' opinion, are not affected by the outbreak	WWF Poland	The contractor prepared illustrative maps of damage to forest stands and of planned fellings.
It is necessary to specify the provisions as regards the consistency of the EPP findings in relation to nature monuments	WWF Poland	The EPP did not change in relation to nature monuments.
It is unreasonable to leave individual hollow trees	WWF Poland	In accordance with the Forest Protection Instruction, biocenotic trees, including hollow trees, are left in forest stands. This rule is and will be respected in carrying out any treatments.
The evaluation U1 or U2 for oak-hornbeam forest habitats resulted from the insufficient quantity of dead wood, and not from soil acidification. Leave	WWF Poland	In the State Forests, the Act on forests of 28 September 1991 shall apply, which imposes on forest inspectors specific tasks and procedures should any threat to the sustainability of forest stands appear (Article 9(1), Article 35).

these habitats for natural regeneration and maintain a moratorium on fellings in tree stands older than 100 years, according to the criterion of Prof. Wesółowski		
Intensify monitoring of habitats of thermophilic oak forests	WWF Poland	The comment is well founded.
The size of the cluster – 5% of the area of the treatment, but no less than 10 ares	WWF Poland	The comment provided to the contractor.
Table „Example No 6” does not take account of the CTP provisions and of the UNESCO application	WWF Poland	In fact, the provisions of the approved CTP block a possibility of carrying out the activities planned in the annex. The RDSF in Białystok and the Białowieża Forest District have taken activities to repeal the Ordinance of the Regional Director of Environmental Protection in Białystok of 6 November 2015 on establishing the conservation tasks plan for the Białowieża Forest Natura 2000 site, claiming that this ordinance violates the legal interest of the State Treasury property manager.
Intense harvesting, extraction and soil improvement will contribute to the destruction of natural regeneration, which is in contradiction with the Management and Protection Programme of the Forest Promotional Complex and with the Forest Breeding Rules	WWF Poland	Natural regenerations will be promoted wherever possible. Natural regeneration results from the forest breeding rules and is preferred in the first place.
Leaving single dead trees will include removing infest-free snag – which will not affect the outbreak and will reduce the resources of dead wood. This	WWF Poland	Planned treatments are a response to a threat to the sanitary condition of the forest, for which, pursuant to § 4 of the Forest Protection Instruction, the forest inspector is responsible. In accordance with the Forest Protection Instruction, in order to protect the biodiversity, it is necessary to leave in the forest dead wood at various stages of decomposition.

is in contradiction with: Forest Protection Instruction, Management and Protection Programme of the Forest Promotional Complex, Polish policy of the complex protection of forest resources, recommendations of other experts from the WULS and FRI		
The assessment of the environmental impact of forest management activities should not be changed.	WWF Poland	The comment provided to the contractor.
Proposal to make a change in the Forecast – the impact classification should be changed from „Potentially negative” to „Negative” (Table 1) in case of the following points: allowable cut of major forest products, final and intermediate; Regeneration of clearings and sparsely timbered areas; Felling method I; Felling methods III and IV;	WWF Poland	The comment provided to the contractor.
Non-compliance with the provisions of the application enlarging the world heritage site	WWF Poland	The application to the UNESCO contained the general indications while the specific action plan will be developed in the site management plan.
Non-compliance with the applicable Act of local law – CTP	WWF Poland	In fact, the provisions of the approved CTP block a possibility of carrying out the activities planned in the annex. The RDSF in Białystok and the Białowieża Forest District have taken activities to repeal the Ordinance of

		the Regional Director of Environmental Protection in Białystok of 6 November 2015 on establishing the conservation tasks plan for the Białowieża Forest Natura 2000 site, claiming that this ordinance violates the legal interest of the State Treasury property manager.
No justification for interfering in the natural processes in the Białowieża Forest	WWF Poland	The comment is too general. Natural processes in a form of natural regeneration are always preferred by the SF NFH. The outbreak of bark beetle should not be considered a natural process but only the extraordinary development of damage on the part of biotic factors.
Withdraw, in the largest possible area, from fellings and from artificial regeneration	WWF Poland	In the State Forests, the Act on forests of 28 September 1991 shall apply, which imposes on forest inspectors specific tasks and procedures should any threat to the sustainability of forest stands appear (Article 9(1), Article 35). Regeneration is planned in accordance with the Forest Breeding Instruction.
The need to modify the table of the environmental impact assessment	WWF Poland	The comment provided to the contractor.
The implementation of the provisions of Expert opinion will have a negative environmental impact	WWF Poland	In the State Forests, the Act on forests of 28 September 1991 shall apply, which imposes on forest inspectors specific tasks and procedures should any threat to the sustainability of forest stands appear (Article 9(1), Article 35). In carrying out permanently sustainable forest management and following the rules of the common forest protection, forest maintenance sustainability, enlargement of forest resources, there is no risk of habitat degradation. The real impact of the planned activities is, therefore, undeniable.
Acceptance of clear felling methods may not be allowed.	WWF Poland	The type of the planned felling method was determined by the degree of damage to the forest stand and regeneration. In case of natural habitats, harvest felling was designed only for the habitat 9170 Tilio-Carpinetum betuli.
It is unacceptable to make fellings using the felling method I in tree stands where spruce is not dominant	WWF Poland	The submitter of the comment provided incorrect data.

<p>Remove the planned reconstruction in tree stands where spruce is not dominant. The expert opinion will have a negative environmental impact, including the protection objectives of the Natura 2000 site.</p>	<p>WWF Poland</p>	<p>Planned treatments are a response to a threat to the sanitary condition of the forest, for which, pursuant to § 4 of the Forest Protection Instruction, the forest inspector is responsible.</p>
<p>The study should be rejected in its entirety, since it does not include the CTP for the Natura 2000 site, does not take into account the special status of the Forest as the Transboundary World Heritage Site and the consequences of having entered the whole Forest into the UNESCO list.</p>	<p>Wiesław Walankiewicz, Ph. D</p>	<p>In fact, the provisions of the approved CTP block a possibility of carrying out the activities planned in the annex. The RDSF in Białystok and the Białowieża Forest District have taken activities to repeal the Ordinance of the Regional Director of Environmental Protection in Białystok of 6 November 2015 on establishing the conservation tasks plan for the Białowieża Forest Natura 2000 site, claiming that this ordinance violates the legal interest of the State Treasury property manager.</p> <p>Poland has committed before the UNESCO to cover the oldest forest stands in the Białowieża Forest, referred to as forest stands older than 100 years and pioneer forest stands, with special protection. The provisions contained in the documents submitted to the World Heritage Centre reflect the situation of 2013, when the FMP was already applicable and all forest stands older than 100 years were formally excluded from use. Back then, a commitment was made to comply with the provisions of the FMP. The application to the UNESCO contained the general indications while the specific action plan will be developed in the site management plan.</p> <p>Along with submitting the application for the annex, the Forest Inspector applied for reviewing the provisions of the “road map” which did not include the disastrous outbreak.</p>
<p>Tree stands older than 200 years should not be exploited, too high harvesting intensity</p>	<p>Wiesław Walankiewicz, Ph. D</p>	<p>Planned treatments are a response to a threat to the sanitary condition of the forest.</p>

Stanowisko do UWAG zgłoszonych do DOKUMENTACJI ANEKSU DO PUL NADLESNICTWA BIAŁOWIEŻA NA OKRES 2012 - 2021

Harvesting infest-free snag which does not contain bark beetle will not affect the outbreak, and will reduce resources of dead wood	Wiesław Walankiewicz, Ph. D	Leaving dead wood is, as indicated, obligatory in the SF. Sanitation fellings planned in the annex apply to fully occupied spruces in forest stands with spruce or in spruce stands. Snag will be removed due to regeneration of the area, public safety in the transport and tourist trails and occupational safety.
The selective use of scientific publications	Wiesław Walankiewicz, Ph. D	The comment provided to the contractor.
The expert opinion does not meet the formal or substantive requirements and should be done once again by another independent, objective institution/ company involved in environmental valuation	Wiesław Walankiewicz, Ph. D	The comment provided to the contractor.
The current Forest Management Plan has been prepared in an incompetent way and implemented inefficiently.	Hanna Skowrońska	The Forest Management Plan, in accordance with the Act on forests is prepared by specialized units or other forest management entities
The use of the BF forests in a intense manner assumed in the annex to the FMP will result in a radical reduction in income in the future	Hanna Skowrońska	The purpose of the Amendment to the FMP is not to gain additional income, but only to implement the provisions of Articles 9 and 35(1) of the Act on forests as well as the provisions of the Forest Protection Instruction. In carrying out permanently sustainable forest management and following the rules of the common forest protection, forest maintenance sustainability, enlargement of forest resources, there is no risk of habitat degradation. The real impact of the planned activities is, therefore, undeniable.
Increased harvesting will decrease the attractiveness of the region for tourists.	Hanna Skowrońska	There is no correlation between harvesting and the attractiveness of the region for tourists.

The fight against bark beetle should be ceased and dead wood should be left.	Hanna Skowrońska	This is inconsistent with the provisions of Articles 9 and 35(1) of the Act on forests as well as with the provisions of the Forest Protection Instruction. The quantity of dead wood in the Białowieża Forest District significantly exceeds the quantities in other forest complexes in the country. The index of the quantity of dead wood in the Białowieża Forest exceeds the standards established by the auditors of the FSC and PEFC certification.
Acceptance of clear felling methods (ib, IIIb, IIIa) may not be allowed	Hanna Skowrońska	Felling methods IIIa and IIIb do not belong to the group of clear felling methods. These are group felling methods. The type of the planned felling method was determined in particular by the degree of damage to the forest stand, location of damage in the forest stand and stocking. In case of natural habitats, harvest felling was designed only for the habitat 9170 Tilio-Carpinetum betuli.
The Białowieża Forest is entered in the UNESCO World Heritage List which means a commitment to protect old tree stands along with natural processes.	Hanna Skowrońska	Old forest stands and natural processes are protected in nature reserves. Interference in old forest stands public safety concerns only was given by removal of "dangerous" and taking care of the sanitary condition of the forest.
Ceasing fellings in tree stands older than 100 years	Hanna Skowrońska	The effective fight against the bark beetle outbreak and the obligations resulting from Articles 9 and 35(1) of the Act on forests, as well as from the Forest Protection Instruction force interference in forest stands of 100 years and older than 100 years.
The comments on the annex to the FMP	Andrzej Sulej	The recipient did not attach the file with his comments to the e-mail message.
Harvesting should not be increased. The entire Forest should be covered by the National Park.	Agnieszka Gołębiowska	Increased harvesting is forced by the disastrous bark beetle outbreak.
Violation of the integrity of the Natura 2000 site	Greenmind Foundation – Przemysław Chylarecki	Cessation of the fight with bark beetle, as required by Articles 9 and 35(1) of the Act on forests as well as the Forest Protection Instruction may result in violating the integrity of the Natura 2000 site. Restrictions

		unprecedented on the SF NFH scale and introduced in the applicable FMP led to extraordinary damage in forest stands of the Białowieża Forest.
A threat to the proper conservation status of species	Greenmind Foundation – Przemysław Chylarecki	The above was contributed to by previous decisions regarding restrictions introduced into the applicable FMP. Planned fellings do not apply to nature reserves, but only to managed forest stands.
Breach of conservation regimes agreed with the UNESCO	Greenmind Foundation – Przemysław Chylarecki	Poland has committed before the UNESCO to cover the oldest forest stands in the Białowieża Forest, referred to as forest stands older than 100 years and pioneer forest stands, with special protection. The provisions contained in the documents submitted to the World Heritage Centre reflect the situation of 2013, when the FMP was already applicable and all forest stands older than 100 years were formally excluded from use. Back then, a commitment was made to comply with the provisions of the FMP. The application to the UNESCO contained the general indications while the specific action plan will be developed in the site management plan. Along with submitting the application for the annex, the Forest Inspector applied for reviewing the provisions of the “road map” which did not include the disastrous outbreak.
Impossibility to control the bark beetle outbreak	Greenmind Foundation – Przemysław Chylarecki	The only effective way to fight against bark beetle is to remove infested trees and taking them out from the forest. Through monitoring, the SF NFH have a high detection rate of infested trees. The fight against bark beetle is not a logistic problem, but is associated with procedural restrictions introduced in the applicable FMP. The outbreak may disappear due to natural factors, however, referring to the applicable regulations, the site manager may not afford it. Monitoring of bark beetle indicates that it infested not only spruce stands in older age classes, but also forest stands in II and III age class and even pine forest stands.
Non-compliance with the provisions of the application enlarging the world heritage site	Natural Heritage Foundation	Poland has committed before the UNESCO to cover the oldest forest stands in the Białowieża Forest, referred to as forest stands older than 100 years and pioneer forest stands, with special protection. The provisions contained in the documents submitted to the World Heritage

		Centre reflect the situation of 2013, when the FMP was already applicable and all forest stands older than 100 years were formally excluded from use. Back then, a commitment was made to comply with the provisions of the FMP. The application to the UNESCO contained the general indications while the specific action plan will be developed in the site management plan. Along with submitting the application for the annex, the Forest Inspector applied for reviewing the provisions of the “road map” which did not include the disastrous outbreak.
Non-compliance with the applicable Act of local law – CTP	Natural Heritage Foundation	In fact, the provisions of the approved CTP block a possibility of carrying out the activities planned in the annex. The RDSF in Białystok and the Białowieża Forest District have taken activities to repeal the Ordinance of the Regional Director of Environmental Protection in Białystok of 6 November 2015 on establishing the conservation tasks plan for the Białowieża Forest Natura 2000 site, claiming that this ordinance violates the legal interest of the State Treasury property manager.
The team of experts appointed in 2006 by President of the Republic of Poland, L. Kaczyński, determined the average annual wood harvesting volume at the level of 30,000 m ³ (which corresponds to the fuel-related needs the local community), while it is planned to exceed this value by several times.	Natural Heritage Foundation	The value determined by the team has not been accepted by all team members. Since the moment on which the FMP 2012-2021 entered into force in the Białowieża Forest District, bark beetle has infested the total volume of spruces amounting to more than 320 thousand m ³ . Therefore, this argument has become outdated.
Tree stands older than 200 years should not be exploited, too high harvesting intensity	Natural Heritage Foundation	Interference in old forest stands applies only to providing public safety by removing dangerous trees and taking care of the sanitary condition of the forest. Planned treatments are a response to the disastrous outbreak and the resulting sanitary conditions of forest stands, for which, in accordance with the Act on forests the Forest Inspector is responsible.

Acceptance of clear felling methods (ib, IIIb, IIIa) may not be allowed	Natural Foundation	Heritage	Felling methods IIIa and IIIb do not belong to the group of clear felling methods. These are group felling methods. The type of the planned felling method was determined in particular by the degree of damage to the forest stand, location of damage in the forest stand and stocking. In case of natural habitats, harvest felling was designed only for the habitat 9170 Tilio-Carpinetum betuli.
A proposal to make a change in the Forecast – the impact classification should be changed from „Potentially negative” to „Negative” (Table 1) in case of the following points: Felling method I;	Natural Foundation	Heritage	The comment provided to the contractor.
Intense harvesting, extraction and soil improvement will contribute to the destruction of natural regeneration, which is in contradiction with the Management and Protection Programme of the Forest Promotional Complex and with the Forest Breeding Rules	Natural Foundation	Heritage	Natural regenerations will be promoted wherever possible. Natural regeneration results from the forest breeding rules and is preferred in the first place. Species composition of artificial regenerations are set out in the forest management plan and result from the forest habitat types and associations.
Harvesting infest-free snag which does not contain bark beetle will not affect the outbreak, and will reduce resources of dead wood	Natural Foundation	Heritage	In accordance with the Forest Protection Instruction, in order to protect the biodiversity, it is necessary to leave in the forest dead wood at various stages of decomposition.
No justification for interfering in the natural processes in the Białowieża Forest	Natural Foundation	Heritage	The comment is too general. Natural processes in a form of natural regeneration are always preferred by the SF NFH. The outbreak of bark beetle should not be considered a natural process but only the extraordinary development of damage on the part of biotic factors.

Stanowisko do UWAG zgłoszonych do DOKUMENTACJI ANEKSU DO PUL NADLESNICTWA BIAŁOWIEŻA NA OKRES 2012 - 2021

It is necessary to change the assessment of the impact of treatments on saproxylic species	Natural Foundation	Heritage	The comment is too general
Fragmentation of the area in which activities will be taken will be a reason for which they will not limit the bark beetle outbreak.	Natural Foundation	Heritage	In the State Forests, the Act on forests of 28 September 1991 shall apply, which imposes on forest inspectors specific tasks and procedures should any threat to the sustainability of forest stands appear (Article 9(1)).
The selective use of scientific publications	Natural Foundation	Heritage	The comment provided to the contractor.
Introduction of the annex destroys the efforts made by the GDSF to reach an agreement with environmental non-governmental organisations.	Natural Foundation	Heritage	The general comment.
Breach of safety requirements imposed by the UNESCO	Workshop for All Beings Association		Poland has committed before the UNESCO to cover the oldest forest stands in the Białowieża Forest, referred to as forest stands older than 100 years and pioneer forest stands, with special protection. The provisions contained in the documents submitted to the World Heritage Centre reflect the situation of 2013, when the FMP was already applicable and all forest stands older than 100 years were formally excluded from use. Back then, a commitment was made to comply with the provisions of the FMP. The application to the UNESCO contained the general indications while the specific action plan will be developed in the site management plan. Along with submitting the application for the annex, the Forest Inspector applied for reviewing the provisions of the “road map” which did not include the disastrous outbreak.

Non-compliance with the applicable CTP	Workshop for All Beings Association	In fact, the provisions of the approved CTP block a possibility of carrying out the activities planned in the annex. The RDSF in Białystok and the Białowieża Forest Forest District have taken activities to repeal the Ordinance of the Regional Director of Environmental Protection in Białystok of 6 November 2015 on establishing the conservation tasks plan for the Białowieża Forest Natura 2000 site, claiming that this ordinance violates the legal interest of the State Treasury property manager.
Non-compliance with the guidelines on environmental impact assessments on the Natura 2000 sites and the rules of protection of the Natura 2000 sites	Workshop for All Beings Association	The comment provided to the contractor.
Violation of Article 6(3) of the Habitats Directive	Workshop for All Beings Association	The comment provided to the contractor.
No environmental inventory	Workshop for All Beings Association	The implementation did not relate to the annex.
Non-compliance with the provisions of the application enlarging the world heritage site	Mr Adam Bohdan/Mariusz Duchewicz	Poland has committed before the UNESCO to cover the oldest forest stands in the Białowieża Forest, referred to as forest stands older than 100 years and pioneer forest stands, with special protection. The provisions contained in the documents submitted to the World Heritage Centre reflect the situation of 2013, when the FMP was already applicable and all forest stands older than 100 years were formally excluded from use. Back then, a commitment was made to comply with the provisions of the FMP. The application to the UNESCO contained the general indications while the specific action plan will be developed in the site management plan. Along with submitting the application for the annex, the Forest Inspector applied for reviewing the provisions of the "road map" which did not include the disastrous outbreak.

Stanowisko do UWAG zgłoszonych do DOKUMENTACJI ANEKSU DO PUL NADLESNICTWA BIAŁOWIEŻA NA OKRES 2012 - 2021

Non-compliance with the applicable Act of local law – CTP	Mr Bohdan/Mariusz Duchewicz	Adam	In fact, the provisions of the approved CTP block a possibility of carrying out the activities planned in the annex. The RDSF in Białystok and the Białowieża Forest Forest District have taken activities to repeal the Ordinance of the Regional Director of Environmental Protection in Białystok of 6 November 2015 on establishing the conservation tasks plan for the Białowieża Forest Natura 2000 site, claiming that this ordinance violates the legal interest of the State Treasury property manager.
Harvesting will shatter the existing efforts to recover the Diploma of the Council of Europe by the BNP (we lost that diploma due to the lack of protection of old tree stands growing outside the BNP)	Mr Bohdan/Mariusz Duchewicz	Adam	The decision to recover the Diploma is dependent on an evaluation by independent experts.
The team of experts appointed in 2006 by President of the Republic of Poland, L. Kaczyński, determined the average annual wood harvesting volume at the level of 30,000 m ³ (which corresponds to the fuel-related needs the local community), while it is planned to exceed this value by several times.	Mr Bohdan/Mariusz Duchewicz	Adam	The value determined by the team has not been accepted by all team members. Since the moment on which the FMP 2012-2021 entered into force in the Białowieża Forest District, bark beetle has fully occupied the total volume of spruces amounting to more than 320 thousand m ³ . Therefore, this argument has become outdated. The value determined by this team did not take account of the size of the outbreak.
Tree stands older than 200 years should not be exploited, too high harvesting intensity	Mr Bohdan/Mariusz Duchewicz	Adam	Planned treatments are a response to the disastrous outbreak and the resulting sanitary conditions of forest stands, for which, in accordance with the Act on forests the Forest Inspector is responsible.
Acceptance of clear felling methods (ib, IIIb, IIIa) may not be allowed	Mr Bohdan/Mariusz Duchewicz	Adam	Felling methods IIIa and IIIb do not belong to the group of clear felling methods. These are group felling methods. The type of the planned felling method was determined in particular by the degree of damage to the

			forest stand, location of damage in the forest stand and stocking. In case of natural habitats, harvest felling was designed only for the habitat 9170 Tilio-Carpinetum betuli.
A proposal to make a change in the Forecast – the impact classification should be changed from „Potentially negative” to „Negative” (Table 1) in case of the following points: Felling method I;	Mr Bohdan/Mariusz Duchewicz	Adam	The comment provided to the contractor of the Forecast.
Intense harvesting, extraction and soil improvement will contribute to the destruction of natural regeneration, which is in contradiction with the Management and Protection Programme of the Forest Promotional Complex and with the Forest Breeding Rules	Mr Bohdan/Mariusz Duchewicz	Adam	Natural regenerations will be promoted wherever possible. Natural regeneration results from the forest breeding rules and is preferred in the first place. Species composition of artificial regenerations are set out in the forest management plan and result from the forest habitat types and associations.
Harvesting infest-free snag which does not contain bark beetle will not affect the outbreak, and will reduce resources of dead wood	Mr Bohdan/Mariusz Duchewicz	Adam	In accordance with the Forest Protection Instruction, in order to protect the biodiversity, it is necessary to leave in the forest dead wood at various stages of decomposition.
No justification for interfering in the natural processes in the Białowieża Forest	Mr Bohdan/Mariusz Duchewicz	Adam	The comment is too general. Natural processes in a form of natural regeneration are always preferred by the SF NFH. The outbreak of bark beetle should not be considered a natural process but only the extraordinary development of damage on the part of biotic factors.
It is necessary to change the assessment of the impact of	Mr Bohdan/Mariusz Duchewicz	Adam	The comment provided to the contractor.

Stanowisko do UWAG zgłoszonych do DOKUMENTACJI ANEKSU DO PUL NADLESNICTWA BIAŁOWIEŻA NA OKRES 2012 - 2021

treatments on saproxylic species		
Fragmentation of the area in which activities will be taken will be a reason for which they will not limit the bark beetle outbreak.	Mr Adam Bohdan/Mariusz Duchewicz	In the State Forests, the Act on forests of 28 September 1991 shall apply, which imposes on forest inspectors specific tasks and procedures should any threat to the sustainability of forest stands appear (Article 9(1)).
Ignoring scientific publications	Mr Adam Bohdan/Mariusz Duchewicz	
No justification for interfering in the natural processes in the Białowieża Forest	Natural Heritage Foundation	The comment is too general. Natural processes in a form of natural regeneration are always preferred by the SF NFH. The outbreak of bark beetle should not be considered a natural process but only the extraordinary development of damage on the part of biotic factors.
The Forecast has been prepared in an incompetent way and the assessments it contains are erroneous. Request to prepare the Environmental Impact Forecast again, by an independent and competent team of authors	„Face of the Earth” Association	Materials submitted (45 comments on 27 pages) are a review of the Forecast and Expert Opinion. The author of the comments enters into a detailed dispute with the recommendations and assessments contained in the documents prepared by the Forest Management Office. Most of the postulates may be implemented in the National Parks. In the Białowieża Forest District, it is impossible due to the existing legal regulations (obligations resulting from Articles 9 and 35(1) of the Act on forests, as well as from the Forest Protection Instruction). Decisions restricting the possibilities of conservation practices led to the destabilisation of forest stands in a large area. The quantity of wood to harvest results from the disaster situation. The volume mentioned by the author is not exceeded. An error occurred, the RDSF made a correction (PIB “Forest management” tab).
The comments on the cessation of fellings in the Białowieża Forest, referring to the negative impact of forest	Marek Jacel	The comment is too general. The goal of the annex is to protect spruce stands and forest stands with spruce against the disastrous outbreak spreading out.

management on the development of tourism.		
The harvesting volume for 10 years completed within 3 years. The bark beetle outbreak is a natural process and nothing is able to stop it.	Łukasz Synowiecki	The Białowieża Forest District is in the 4th year of the plan. The degree of implementing the harvesting volume for the Białowieża Forest District in 2015, assuming the increased size of fellings, will be 96.5%. The Forest Protection Instruction indicates the obligations which include, <i>inter alia</i> , maintenance of the sanitary condition of the forest, including the fight against bark beetle. Care, in the first place, of the sanitary condition made it impossible to carry out obligatory treatments indicated in the FMP. Therefore, it is necessary to make an annex to the applicable FMP.
Tree felling for gaining profit.	Łukasz Synowiecki	The effective fight against the bark beetle outbreak and the obligations resulting from Articles 9 and 35(1) of the Act on forests, as well as from the Forest Protection Instruction force interference in spruce stands regardless of the age of forest stands. Income from the sale of wood derives from the implementation of the tasks referred to in the Act on forests, i.e. permanently sustainable forest management.
The expert opinion and Forecast do not take into account the CTP provisions for the BF Natura 2000 site.	Adam Snopek	In fact, the provisions of the approved CTP block a possibility of carrying out the activities planned in the annex. The RDSF in Białystok and the Białowieża Forest District have taken activities to repeal the Ordinance of the Regional Director of Environmental Protection in Białystok of 6 November 2015 on establishing the conservation tasks plan for the Białowieża Forest Natura 2000 site, claiming that this ordinance violates the legal interest of the State Treasury property manager.
The CTP provides for excluding from management activities tree stands older than 100 years and tree stands growing on hydrogenic habitats.	Adam Snopek	Treatments with regard to trees older than 100 years, as planned in the Amendment to the FMP, result mainly from a need to ensure the sustainability of forest stands and public safety. The need to remove all dead trees growing along the roads, tourist trails and other places where people stay in the territory of the Białowieża Forest results from the responsibility of the site managers for guaranteeing public safety, which is not taken into account in the CTP for the Białowieża Forest Natura 2000 site. It is also necessary to take into account the fact that compensation for damage to health or property due to fallen trees is incurred by the

		Forest District which manages the State Treasury property. Therefore, the claims of potential victims will finally charge the State Treasury.
Too general provisions of the Forecast as regards the impact of planned treatments on animal species being subjects of conservation in the BF Natura 2000 site.	Adam Snopek	The Environmental Impact Forecast, in accordance with the Act on forests is prepared by specialised units or other forest management entities. It is difficult to argue with this type of objections.
Proceeding with the Expert Opinion and Forecast for the Białowieża Forest District earlier than with similar documents for two other BF Forest Districts.	Adam Snopek	The degree of implementing the allowable cut for the Białowieża Forest District in 2015, assuming the increased size of fellings, will be 96.5%. Due to the bark beetle outbreak, no obligatory treatments were carried out, but only sanitation fellings. The percentage of salvage forest products within 4 years of the plan is about 60%. For this reason, with the smaller advancement of harvesting plans in the Browsk and Hajnówka Forest Districts there was no necessity of similar activities.
Violation of the integrity of the Natura 2000 site	Greenpeace Poland Foundation – Magdalena Figura	Cessation of the fight with bark beetle, as required by Articles 9 and 35(1) of the Act on forests as well as by the Forest Protection Instruction may result in violating the integrity of the Natura 2000 site.
A threat to the proper conservation status of species	Greenpeace Poland Foundation – Magdalena Figura	The above was contributed to by previous decisions regarding restrictions introduced into the applicable FMP. Planned fellings do not apply to nature reserves, but only to managed forest stands.
Breach of conservation regimes agreed with the UNESCO	Greenpeace Poland Foundation – Magdalena Figura	Poland has committed before the UNESCO to cover the oldest forest stands in the Białowieża Forest, referred to as forest stands older than 100 years and pioneer forest stands, with special protection. The provisions contained in the documents submitted to the World Heritage Centre reflect the situation of 2013, when the FMP was already applicable and all forest stands older than 100 years were formally excluded from use. Back then, a commitment was made to comply with the provisions of the FMP. The application to the UNESCO contained the general indications while the specific action plan will be developed in the site management plan.

		Along with submitting the application for the annex, the Forest Inspector applied for reviewing the provisions of the “road map” which did not include the disastrous outbreak.
Impossibility to control the bark beetle outbreak	Greenpeace Poland Foundation – Magdalena Figura	The only effective way to fight against bark beetle is to remove infested trees and taking them out from the forest. Through monitoring, we have a high detection rate of infested trees. The fight against bark beetle is not a logistic problem, but is associated with procedural restrictions introduced in the applicable FMP. The outbreak may disappear due to natural factors, however, referring to the applicable regulations, the site manager may not afford it. Monitoring of bark beetle indicates that it colonises not only spruce stands in older age classes but also forest stands in II and III age class and even pine forest stands.
The wrong forecast of the impact of the annex to the FMP on the environment and Natura 2000 sites. The forecast does not contain a valid assessment of the impact on the subject of conservation and integrity of the BF Natura 2000 site.	Greenpeace Poland Foundation – Magdalena Figura	The Environmental Impact Forecast, in accordance with the Act on forests is prepared by specialised units or other forest management entities.
The Białowieża Forest has been entered into the Transboundary World Heritage List, in this situation, the BNP with surprise and anxiety accepts a proposal to carry out final fellings	Białowieża National Park (BNP)	Poland has committed before the UNESCO to cover the oldest forest stands in the Białowieża Forest, referred to as forest stands older than 100 years and pioneer forest stands, with special protection. The provisions contained in the documents submitted to the World Heritage Centre reflect the situation of 2013, when the FMP was already applicable and all forest stands older than 100 years were formally excluded from use. Back then, a commitment was made to comply with the provisions of the FMP. The application to the UNESCO contained the general indications while the specific action plan will be developed in the site management plan.

		Along with submitting the application for the annex, the Forest Inspector applied for reviewing the provisions of the “road map” which did not include the disastrous outbreak.
Planned treatments are not able to stop the outbreak	BNP	The strong bark beetle outbreak, taking place in the Białowieża Forest from 2012, due to the applicable administrative decisions led to dying of spruce stands. The Białowieża Forest District is in the 4th year of the plan. The degree of implementing the harvesting volume for the Białowieża Forest District in 2015, assuming the increased size of fellings, will be 96.5%. The Forest Protection Instruction indicates the obligations which include, <i>inter alia</i> , maintenance of the sanitary condition of the forest, including the fight against bark beetle. Care, in the first place, of the sanitary condition made it impossible to carry out obligatory treatments indicated in the FMP. Therefore, it is necessary to make an Amendment to the applicable FMP.
Whether the undertaken management activities do not compromise adaptation processes in regeneration of tree stands.	BPN	During regenerations, we should strive for the maximum use of natural regenerations and such activities are a priority. Species composition of artificial regenerations are set out in the forest management plan and result from the forest habitat types and phytosociological studies. It is possible to modify the growing share of spruce.
The expert opinion and Forecast ignore the state of knowledge about natural processes taking place in forest ecosystems of natural origin.		The comment provided to the contractor of the Forecast.

The study has been drawn up by the Białowieża Forest District and the RDSF in Białystok

DIRECTOR