

WOODMARK FOREST QUESTIONNAIRE
Prešov State Forest District, Slovakia

Name: Juraj Lukáč

Position: Chairman

Organisation: WOLF - Forest Protection Movement (WOLF)

Contact Address: 082 13 Tulcik 27, Slovakia

Telephone: +421-51-7789 488

Fax: +421-51-7789 488

Email: alfa@wolf.sk

WOLF Forest Protection Movement is a national organisation working on the protection of natural forests. We have been running our various activities on the territory of the Presov Forest District (PFD) for over twenty years. WOLF is a member of Friends of the Earth - Slovakia, International Wolf Federation, Taiga Rescue Network, Native Forest Network, European Mountain Forum and Forest Stewardship Council.

As the FSC member we are working on a creation of FSC working group and FSC national standards in Slovakia.

Our assessment of the PFD is as follows:

- **FSC Criterion 1.1. Forest management shall respect all national and local laws and administrative requirements.**

Section (3) of the article 17 on Nature Reserve of the Law No. 287/1994 of the Codes on the Nature and landscape protection says: "In the territory of a nature reserve and national nature reserve the fifth level of protection is valid and the following activities are prohibited:

paragraph b) influencing forest vegetation, cutting trees and damaging vegetation and topsoil,

paragraph f) hunting animals and fish and building troughs and salt-troughs for them."

The Presov Forest District includes several reserves and Slovensky Raj National Park. In the last five years the above mentioned law **has been broken several times** and representatives of the PFD have expressed their unwillingness to change their practices.

Case study:

NPR Oblik (Oblik National Nature Reserve):

From February to May 1996 the multiple cutting of trees has occurred in NPR Oblik. The PFD still remains unpunished.

In the same period the PFD executed a clearcut felling in the buffer zone of the NPR Oblik, in the forest stands No. 465 and 466, with no permission. (See the photo No. 1.)

Such cutting practices have been repeatedly performed also within the current LHP (forest management plan) effective through a period from 1997 to 2007.

Sources:

- An appeal for the beginning of a penalty procedure for breaking the Law No. 287/1994.

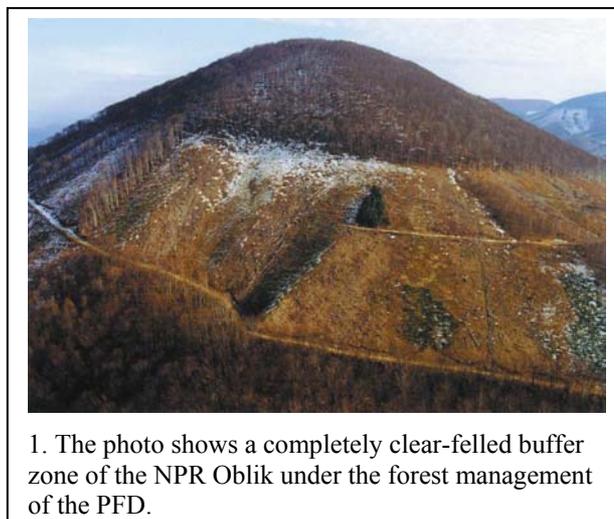
- The minutes of the meeting at the Forest Administration in Hanusovce of April 18, 1996.

Case study:

According to the Law No. 287/1994 of the Codes on the Nature and landscape protection, which has been valid since

January 1, 1995, wolf became the all-year-round protected animal species. On the territory of the PFD this law has not been respected and the wolf population was decreased from 24 specimen in 1994 to 8 in 2001.

In the same period logging in the PFD's territory resulted in the destruction of eagles' nests and thus killing of 6 specimen of golden eagle (*Aquila chrysaetos*) and 4 specimen of lesser spotted eagle (*Aquila pomarina*).



1. The photo shows a completely clear-felled buffer zone of the NPR Oblik under the forest management of the PFD.

- **FSC Criterion 1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity shall be respected.**

Convention on Biological Diversity:

In the last five years, on the PFD's territory WOLF recorded a destruction of biotopes of the following animal species, which are being protected according to the Convention on Biological Diversity:

Annex II - Strictly protected animal species

MICROCHIROPTERA: *Barbastella barbastellus*, *Myotis bechsteini*, *Myotis brandti*, *Myotis myotis*, *Myotis mystacinus*, *Myotis nattereri*, *Nyctalus lasiopterus*, *Nyctalus leisleri*, *Nyctalus noctula*, *Plecotus auritus*

RODENTIA: *Sicista betulina*

CARNIVORA: *Felis sylvestrus*, *Lutra lutra*

AVES: *Ciconia nigra*

Falconiformes: *Accipiter gentilis*, *Accipiter ninus*, *Aquila chrysaetos*, *Aquila pomarina*, *Buteo buteo*, *Falco peregrinus*, *Falco subbuteo*, *Pernis apivorus*

Strigiformes: *Aegolus funereus*, *Asio otus*, *Glaucidium passerinum*, *Strix aluco*, *Strix uralensis*

Caprimulgiformes: *Caprimulgus europaeus*

Passeriformes: *Anthus trivialis*, *Carduelis flamma*, *Carduelis spinosus*, *Certhia brachydactyla*, *Certhia familiaris*, *Coccothraustes coccothraustes*, *Ficedula albicollis*, *Ficedula parva*, *Loxia curvirostra*, *Motacilla cinerea*, *Muscicapa striata*, *Nucifraga caryocatactes*, *Parus ater*, *Parus caeruleus*, *Parus cristatus*, *Parus major*, *Parus montanus*, *Parus palustris*, *Phoenicurus phoenicurus*, *Prunella modularis*, *Pyrhulla pyrhulla*, *Regulus ignicapillus*, *Regulus regulus*, *Sitta europaea*, *Sylvia atricapilla*, *Troglodytes troglodytes*, *Turdus torquatus*

Piciformes: *Dendrocopos leucotos*, *Dendrocopos major*, *Dendrocopos medius*, *Dendrocopos minor*, *Dryocopus martius*, *Jynx torquilla*, *Picoides tridactylus*, *Picus canus*, *Picus viridis*

REPTILIA: *Coronella austriaca*, *Elaphe longissima*

AMPHIBIA: *Bombina bombina*, *Bombina variegata*, *Rana dalmatina*, *Triturus montandoni*

INSECTA: *Rosalia alpina*

Annex III – Protected animal species

MICROCHIROPTERA: *Pipistrellus pipistrellus*

CARNIVORA: *Lynx lynx*, *Martes foina*, *Martes martes*, *Meles meles*, *Mustela erminea*

Paragraph h of the criteria 4 of the Resolution L2 of the Third Ministerial Conference for the Protection of Forests in Europe says:

Standing and fallen dead trees, hollow trees, oldgrowth stands and isolated rare woody species shall be retained in a sufficient amount and composition in order to preserve biodiversity.

The PFD's forest management does not comply with the mentioned paragraph at all, giving reasons that it is in contradiction with the Slovak legislation. We consider the following fact to be the true reason. Dead trees are being reported as a calamity, which has to be felled according to the Forest Law. Such logging allows the PFD to enter forest stands although there is no harvesting prescribed in a relevant forest management plan. At the same time with dead trees even healthy trees are being logged usually. Loggers take advantage of the fact that after trees are being removed from a forest stand, it is hard to prove their original condition.

Case study:

Considering the above mentioned issues, in June 21, 1999 WOLF appealed to all the heads of the Regional Administration Offices in Slovakia to assure leaving a particular number of dead trees in forests. We particularly brought our request to the attention of Mr. Polacko, Head of the KU Presov (Presov Regional Administration) by the letter of July 7, 1999 as PFD's territory is extended in the Presov region. PFD's representatives have expressed their negative attitudes towards our appeal, which was also supported by representatives of state administration at the meeting of the Presov Regional Administration in July 19, 1999. According to their opinion it was not possible to leave any dead trees in forests of the Presov region.

Sources:

- Letter to district administration offices of June 21, 1999
- Letter to the KU Presov (Presov Regional Administration) of July 7, 1999
- The minutes of the meeting at the KU Presov (Presov Regional Administration) of July 19, 1999

- **FSC Criterion 1.5. Forest management areas should be protected from illegal harvesting and other unauthorised activities.**
- **FSC Criterion 2.1. Clear evidence of long-term forest rights to the land shall be demonstrated.**

Protection against thefts is very bad, legal property boundaries are very unclear and their marking in forests is insufficient.

In the PFD's territory thefts of wood occur very often, mainly in a period when people get in supplies of fire wood, prior Christmas when there is the need for Christmas trees and prior All Saints when whole trees are being felled just for the use of branches.

We have recorded cases, in which employees or contracting workers of the PFD evidently participated in thefts. All our proposal for co-operation in discovering and solving such cases have been refused by the PFD. Theft is also being supported by the insufficient marking of property boundaries and by the missing map, which would clearly indicate the PFD's property.

Case study:

In December 1999 WOLF's forest guardian caught four thieves, who were just stealing wood in a forest stand under the PFD's property. It concerned the forest compartment unit No. 273. The theft of 6 firs resulted in a damage of 20,000



2.



3.

The photos show the thieves caught by the WOLF's forest guardian (on the photo No.3. standing on the right) on the PFD's territory in December 1999.



4. One of six firs, which was felled by thieves in the PFD's forest in December 1999.

SKK (Slovak crowns). The forest guardians made detailed photos and reported the whole case to the PFD as the owner of the trees. Despite the fact that the theft was a criminal offence based on the Slovak legislation, as the damage increased 8,000 SKK, the PDF with the help of a state inspection body, i.e. OPPaLH (Department on Land, Agriculture and Forest Management) of the OU Sabinov (Sabinov District Administration), tried to hush up the whole matter.

Case study:

In order to be able to fill in the questionnaire we were in the need to know the legal property boundaries of the PFD. PFD's managers have informed us that such maps do not exist and the only map is the one hung on the wall in their office. The fact is that this map depicts property boundaries of the PFD with over 40% deviation and it also takes in private forests including the WOLF's forest property. Neighbouring forest owners are unclear about property boundaries thus certification inspectors hardly could have the maps available. Currently such a map is being developed by Lesoprojekt Zvolen especially for the need of the WOLF.

Sources:

- Photos
- Ruling No. 124-1/2000/El of the OU Sabinov (Sabinov District Administration)
- Records of the Obvodne oddelenie PZ SR Sabinov (Sabinov

Division of the Police of the Slovak Republic)

• **Principle # 6: Environmental impact**

Sustainable felling

Sustainable felling is the way of forest management, which does not cause the soil degradation, decrease in biodiversity, increase in soil erosion and water runoff and disruption of springy areas.

According to our findings 90% of the PFD's territory does not comply with this criterion.

Case study:

In May 10, 1990 the conservation group WOLF initiated a working meeting at the ONV Presov (Presov District National Committee) including participation of representatives of the Presov Forest Enterprise of the time. As early as in 1990 we were already able to prove that ...*In the north part of Presov district felling has threatened the hydrological situation...*

Representatives of the Presov Forest Enterprise claimed that their forest management was good and did not require any changes. Despite the fact that even later on we have submitted measures by the SHMU (Slovak Institute of Hydrometeorology) proving that the water retention ability of the forested landscape has been deteriorated



5. Felling of trees on stream banks and use of streambeds as skidding trails extremely deteriorate the water retention ability of the forest.



6. Clearcutting and so called “clonny rub” create several hundreds of hectares of clearings in the forest. The photo shows a PFD’s territory in the Slanske Mountains.

minimum in two folds, the Presov Forest Enterprise refused to discuss any changes in their forest management procedures. A petition for forest management changes have been signed by 15,000 people and remained with no reaction from Presov Forest Enterprise’s representatives.

In 1992 we drew also their attention to the fact that due to the improper forest management and consequential decrease in the water accumulation ability, floods would threaten north parts of the Presov region. Our appeals have remained unnoticed. In July 20, 1998 the floods in the respective region resulted even in 50 victims. The forest management, which we criticised, has been going on up to present and the PFD shows no evidence to change it.

Sources:

- Letter No. PLVH 227/1990 of the ONV Presov
- Letter No. 161/1991 of the Slovak Environmental Committee
- Kravcik, M. An analysis of the influence of human management activities on the hydrological regime in the Torysa and Topla river basins. Kosice, 1995
- Krempasky, T. An assessment of the influence of forest management on the hydrological regime of northeast Slovakia. Kosice, 1995

Case study

According to scientific studies the erosion with a rate of 16 mm of soil losses per year occurs mainly in flysch areas being a consequence of harvesting methods as clearcuts and so-called clonny rub (harvesting method close to



7. The use of heavy logging technique has caused the soil erosion in a such extent that soil having been created for 1600 years, has been washed away in a year.

clearcutting and also with similar impacts) and of the heavy machinery use (see the photos No. 6 and 7). A rate of the soil increment is 1 mm in 100 years. Thus in one year the soil, which was created for 1600 years, is being washed away thanks to the forest management and successive erosion. The PFD does not want to change their management practices.

Sources:

- Astrab, J. An analysis of current management in the forest of selected valleys in the Slanske Mountains and an assessment of its influence on the hydrological function of the forest. Kosice, 1996
- Maser, Ch. A report on the Cergov Mountains. Green Perspective Foundation, Corvallis, 1992
- Midriak, R. An analysis of present forest management in the Cergov forests and its influence on the landscape. Zvolen, 1993
- Midriak, R. A proposal for an alternative

management system in the Cergov forests. Zvolen, 1993

- Midriak, R. Forest management in flysch areas. Forestry studies, Bratislava, 1988

Case study:

90% of the PFD's territory suffers from extreme losses of biodiversity as a consequence of the used management practices. Although the decrease in a number of bird species from 35 per 10 hectares to 2 bird species per 10 hectares and wolves from 24 to 8 specimen have been recorded, the PFD refuses any discussion on the subject with conservationists.

Sources:

- Fiala, J. The influence of forest stand structures on nesting ornithocoenosis. Green Perspective Foundation, Presov, 2000
- Lukac, J. A mathematical analysis of human principles of the forest management. Presov, 1996
- Voskar, J. The wolf (*Canis lupus*) ecology and its share in the formation and stability of the Carpathian ecosystem in Slovakia. *Ochrana prirody*, 12: 241-76, 1993

• Principle # 7: Management plan

Access to information

PFD's employees refused to supply us with the map of the PFD's territory explaining that the only map is hung on the wall of their office. They also refused to supply us with forest management plans, which we needed in order to be able to assess the planned management. Such approach has been lasting for years and we see no hope for changes in a near future. Without the mentioned information it is impossible to make a proper assessment of management practices of the PFD and in addition such practice is in contradiction with FSC principles.

CONCLUSION

Only 10% of the territory of the PFD's property comply with the basic FSC principles.

We do not recommend forests of the PFD to be certified according to FSC principles without principle changes in the forest management and education level of PFD's employees.

Suggestions of the WOLF Forest Protection Movement

The Presov Forest District should be only certified after the following conditions are met:

- 20 percent of old standing trees will remain unfelled in each forest stand to the end of their biological life and allowed rotting.
- An even-aged composition in each forest stand and leaving dead wood in forests will be assured.
- No spruce will be planted on the PFD's territory.
- A properly thick network of protected forests of a minimal area from 50 to 300 hectares will be created and situated in all the LHC (forest management units). In these forests all the management activity will be excluded and at the same time a suppression of all the non-productive activities will be secured. A total area of protected forests shall create at least 10% of the overall forest area, of which 500 hectares will be on flysch areas and 500 hectares on andesite areas.
- So-called porastove steny (forest stand walls) in all the exposed and steep forests and forests below ridges will not be created, which means a total ban on clearcut logging as well as such forms of undergrowth logging, which also creates the forest stand walls.
- 30-meter buffer zone with an exclusion of any management activity will be created along both sides of all streams in forest stands.
- 50-meter buffer zone encompassing the whole springy areas will be created.
- The most sustainable management methods and logging equipment will be used in all the forests. Clearcut logging will not be used at all and using heavy harvesting equipment (mainly LKT) will be reduced to a minimum.
- Active co-operation with conservation groups will be established and their presented requirements for the protection of forest biotopes in the course of a creation of forest management plans will be considered and justified changes in the course of the forest management plans' implementation will be respected.
- Killing wolf, lynx, bear and wildcat on the PFD's territory will be banned with no exception.
- Access to maps and forest management plans will be allowed.