

WOODMARK FOREST QUESTIONNAIRE

Presov State Forest District - 2005

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WOLF Forest Protection Movement is a national NGO which has been working on the protection of natural forests for over twenty years including the forests of the Presov State Forest District (PFD). Within a certification process when FSC certificate for the PFD was under consideration, WOLF submitted its objections against the PFD's forest management in the Woodmark Forest Questionnaire in September 2001. Despite our objections and very bad forest management the PFD acquired the FSC certificate in 2001. Then the only our hope was that it would lead to the improvement of the forest management. Unfortunately, it has not happened so far.

The certificate is valid for 5 years on condition that PFD fulfils the compliance requirements and successfully undergoes annual monitoring visits.

WOLF believes that PFD's repeated disregard of conditions, which were specified in the Woodmark International Forest Certification Final Report and in the following reports on conditions of certification and continuous destructive management of forest ecosystems resulting in increased discontent of local citizens, brings into discredit the FSC certification. Repeated conditions in annual monitoring reports, some of which has not been fulfilled even until nowadays, prove that the situation in the PFD has not been changed.

Condition 2001.1

Stakeholders including local people and NGO's, shall be contacted and a mechanism established to allow them to have input to and be kept informed of management planning decisions and operational plans. Operational plans and detailed maps will be made available on request to stakeholders. (FSC Criteria 2.2, 4.4, 8.2d)

Timescale: For completion August 2002 and ongoing

Condition 2002.3

Forest managers at PFD head office shall produce a written policy relating to the public availability of detailed maps that clearly show ownership and planned harvesting. This policy shall be communicated to all forest managers at local level and maps should be made available to the public on request. (FSC Criterion 4.4)

Timescale: To be assessed at next annual monitoring

Condition 2003.1

PFD shall write to all stakeholders explaining the availability of a management summary and maps at all forest offices. Stakeholders shall be encouraged to access this information and asked for their views on the content of what is provided. (FSC Criteria 7.4, 4.4)

Timescale: By next annual monitoring

WOLF as a non-governmental organization had no possibility to contribute to making management planning decisions and operational plans, nor has been informed about them. In August 3rd, 2005 Marek Dulak (a forester and WOLF member) visited the Forest Office of Kokosovce and requested to make him a map of forest stands and a harvesting plan (ťažobná mapa) available. It took a pretty while

to persuade a head of the Forest Office, who finally showed Marek a hand-coloured map hung on a wall, which only displayed borders of forest stands managed by the Forest Office. He refused to make any other map available claiming that Marek should go to PFD's headquarters in Presov, which employees would be more competent to make a decision which map could be made publicly available.

Condition 2001.6

A user-friendly summary of the management plan, summarising the main aspects of management, shall be produced and made publicly available at each forest office. Stakeholders and the public shall be made aware of the availability of this information. (FSC Criterion 7.4).

Timescale: For completion February 2002

Condition 2002.2

Presov Forest District shall ensure that all local forest offices have copies of the summary of management and that these are freely accessible to the public. (FSC Criterion 7.4).

Timescale: To be assessed at next annual monitoring.

Condition 2003.1

PFD shall write to all stakeholders explaining the availability of a management summary and maps at all forest offices. Stakeholders shall be encouraged to access this information and asked for their views on the content of what is provided. (FSC Criteria 7.4, 4.4)

Timescale: By next annual monitoring.

During Marek's visit in the Forest Office of Kokosovce in August 3rd, 2005 he also asked for a user-friendly summary of the management plan. The Forest Office's head claimed that he had never heard about anything like that and that there was nothing like that available in the Forest Office.

Condition 2001.7

A simple summary of monitoring activities shall be produced. This shall include biodiversity monitoring undertaken by third parties (e.g. the Environment Agency and Hunting Associations) and the Forest District. Stakeholders shall be made aware of the availability of this information. (FSC Criterion 8.5).

Timescale: For completion August 2002

Recommendation 2002.11.

Presov Forest District should consider preparing a summary of the results of monitoring and making this easily accessible to the public. (FSC Criterion 8.5).

Recommendation 2003.5

Presov Forest District should prepare a public summary of monitoring results including biodiversity monitoring undertaken by the Forest District and third parties (e.g. the Environment Agency and Hunting Associations). (FSC Criterion 8.5).

Timescale: To be assessed at next annual monitoring

It is interesting to see how the condition 2001.7 with completion date of August 2002 specified in the Final Report of 2001 has been changed only to recommendations in the following monitoring reports. Anyway, to date we are not aware about any summary of monitoring activities and of biodiversity monitoring which should have been undertaken by the PFD and third parties. Thus we assume that the condition 2001.7, specified already in the year 2001, has not been fulfilled yet.

Principle # 6: Environmental impact

Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.

The PFD's forest management has not been changed since 2001. **Destructive harvesting methods are still performed.** The fact that forest management plans in all forest offices have not been changed since the FSC certificate was awarded is one of reasons why forests are still managed in the same way as prior the approval of the certificate. Although the destructive forest interventions are officially called "clonne ruby" (shelter wood cutting), their ecological impacts resemble more those of the clear cutting management method. This is due to a very short partial and total regeneration period, to the fact that no trees are left in forests to the end of their life, to schematism and insensitive and neglectful forest management. Such approach results in the soil degradation, decrease in biodiversity, increase in soil erosion and water runoff and disruption of spring areas. WOLF considers such forest management unsustainable and in contradiction with FSC Principle # 6.



Regeneration cutting near Zlata Bana village executed by the PFD, Forest Office of Kokosovce. Although the applied forest regeneration method is called "clonne rub" (shelter wood cutting), it is obvious that the photos show clearcuts.

Uncovered soil is suddenly exposed to direct solar radiation. Thus the dark soil surface is usually heated to temperatures exceeding 60 °C. Such temperatures cause soil humus mineralization, which is another form of irreversible loss of nutrients in the forest ecosystem. (*Ulehla V., 1947, Napojme prameny*).

The removal of all the trees results in disruption of nutrient cycle in the forest. Processes of releasing nutrients by soil microorganisms continues, however, tree roots, which are interconnected by hyphae of mycorrhizal fungi, are functionless. Thus the uptake of nutrients and their incorporation into plant tissues is stopped and are denuded and **washed away** from the forest. Nutrient losses in the surveyed watershed were increased approximately in thirteen fold after the watershed exploitation. Considering nitrogen, nutrient losses were increased even in 60 fold comparing to a regular state. (*Begon, Harper, Townsed, 1997, EKOLOGIE jedinci, populace, spoločenstva*)

Heavy logging machinery and dragging of logs continues to deteriorate **physical properties of soil**. The forest removal and soil degradation deteriorate **the ability of soil to retain water**.

In 2003 WOLF received a lot of complains from afraid local citizens living below the Slanske vrchy (Slanske Mountains), who criticized inappropriate forest exploitation. Thus WOLF initiated a petition “Save Slanske Mountains”, which calls for immediate stopping of destructive cutting in the area, reassessment of forest management plan and for withdrawal of the FSC certificate from PFD. The petition was signed by a thousand of people. This proves discontent of a general public with such destructive forest management practices. The petition still continues due to continuous destruction of forests.

Although forest management plans allow utilization of less destructive interventions and environmentally friendly means, forest managers do not consider this possibility.



*This kind of PFD's forest management causes the soil degradation, decrease in biodiversity, increase in soil erosion and water runoff.
(Location: near Zlata Bana; Kokosovce Forest Office)*

WOLF believes that the forest management of the PFD is in direct contradiction with FSC Principle #6 because it doesn't conserve biological diversity and its associated values, water resources, soils and unique and fragile ecosystems and landscapes, and disturbs the ecological functions and the integrity of the forest. At the same time there are no safeguards for the protection of rare, threatened and endangered species and their habitats (e.g. nesting and feeding areas).

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.

A situation regarding the destruction of biotopes of animal species, which are being protected according to the Convention on Biological Diversity, is the same as before 2001 as a result of continuous destructive forest management. It concerns the following animal species:

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 sylvestris, 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 flammula*, *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*, *Pyrrhula pyrrhula*, *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*

Condition 2001.5

A policy to retain dead and over mature trees where this does not compromise forest health shall be formulated. Managers shall then detail explicit plans within management plans to promote their retention. (FSC Criterion 6.3).

Timescale: For completion February 2002

Condition 2003.15

PFD should ensure that records for all identified conservation sites (species and habitats with locations) are held by appropriate forest offices. (FSC Criterion 6.2a, 7.1g)

Timescale: By next annual monitoring

WOLF has observed that a very small amount of dead wood remains in forests after final cutting. It is mostly represented by piles of logging residues without any bigger dead wood which are of primary importance to the conservation of biodiversity of saproxylic organisms (providing for them more stable temperature and humidity). In areas where regeneration cutting is executed no trees are left to the end of their life.

During the visit of Marek Dulak in the Forest Office of Kokosovce in August 3rd, 2005, its head claimed that the Forest Office did not hold any written principles on retaining dead and over mature trees. He also stated that a certain amount of dead wood, based only on the opinion of a forest manager, was retained.

At the same time the Forest Office of Kokosovce does not have any records of conservation sites besides data which are included in a descriptive part of the forest management.

Marek also learned from the head of the Forest Office that if a forest management plan prescribed regeneration cutting along a water course, no buffer zones were considered and cutting along the water course is executed the same way as in other parts of a forest stand.

Principle #4 Community relations and worker's rights

Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.

There is a very bad relationship between PFD's foresters and local communities. For instance the Forest Office of Kokosovce purposely prevents various local initiatives from making their local area more attractive for tourists and from fighting against road destruction by foresters, etc.

In 2003 the PFD went through a transformation process and permanently employed forest workers were dismissed. PFD considered provide forest works by self-employed workers. According to Slovak legislation, all the dismissed employees should have received 2 months' pay as compensation. As to avoid paying the compensation, the PFD forced its forest workers to sign an agreement on termination the employment. In fact, the workers were threatened because if they hadn't signed it, later on the PFD would have refused to employ them as self-workers under various excuses.

In 2003 some critical articles bringing attention to damaged roads from skidding and transporting logs were published in a local press. As a response to this activity, PFD refused to employ local self-workers which were connected with an author of the article.

WOLF has received all these information as well as many others from a reliable source which want to stay anonymous considering negative experience with PFD's foresters.

Thus PFD's practices are also in strong contradiction with principle #4 according to which **forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.**

WOLF believes **that in many cases PFD's approach to forest workers and local communities remains at the level of totalitarian regime.**

Conclusion

Based on the above mentioned facts WOLF calls for **immediate withdrawal of the FSC certificate** from the Presov State Forest District. During four years of the certificate validity no real improvement was achieved in regard to the adherence to the FSC principles and criteria.

Tulcik, September 19, 2005