






Centralized National Risk Assessment for Poland

FSC-CNRA-PL V1-0 EN

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Risk assessments that have been finalized for Poland

Controlled Wood categories		Risk assessment completed?
1	Illegally harvested wood	APPROVED – not included in this document
2	Wood harvested in violation of traditional and human rights	YES
3	Wood from forests where high conservation values are threatened by management activities	YES
4	Wood from forests being converted to plantations or non-forest use	YES
5	Wood from forests in which genetically modified trees are planted	APPROVED – not included in this document

Risk designations in finalized risk assessments for Poland

Indicator	Risk designation (including functional scale when relevant)
Controlled wood category 1: Illegally harvested wood	
1.1	
1.2	
1.3	
1.4	
1.5	
1.6	
1.7	
1.8	
1.9	
1.10	
1.11	
1.12	
1.13	
1.14	
1.15	
1.16	
1.17	
1.18	
1.19	
1.20	
1.21	
Controlled wood category 2: Wood harvested in violation of traditional and human rights	
2.1	Low risk
2.2	Specified risk for right to freedom of association and collective bargaining and for discrimination of women and Roma people in the labour market.
2.3	Low risk
Controlled wood category 3: Wood from forests where high conservation values are threatened by management activities	
3.0	Low Risk
3.1	Specified risk for Białowieża Forest (Browsk, Hajnówka, Białowieża FMUs) and Forest districts Bircza, Ustrzyki Dolne, Lesko, Komańcza, Baligród, Cisna, Lutowiska, Stuposiany of Krosno Regional Directorate of State Forests
3.2	Specified risk for Bircza, Ustrzyki Dolne, Lesko, Komańcza, Baligród, Cisna, Lutowiska, Stuposiany FMUs of the Krosno Regional Directorate of State Forests
3.3	Specified risk for Białowieża Forest (Browsk, Hajnówka, Białowieża FMUs)
3.4	Low Risk

3.5	Low Risk
3.6	Low Risk
Controlled wood category 4: Wood from forests being converted to plantations or non-forest use	
4.1	Undesignated risk
Controlled wood category 5: Wood from forests in which genetically modified trees are planted	
5.1	

Risk assessments

Controlled wood category 2: Wood harvested in violation of traditional and human rights

Risk assessment

Indicator	Sources of Information	Functional scale	Risk designation and determination
2.1. The forest sector is not associated with violent armed conflict, including that which threatens national or regional security and/or linked to military control.	See detailed analysis below.	Country	<p>Low risk</p> <p>The following low risk thresholds apply:</p> <p>(1) The area under assessment is not a source of conflict timber ; AND</p> <p>(2) The country is not covered by a UN security ban on exporting timber; AND</p> <p>(3) The country is not covered by any other international ban on timber export; AND</p> <p>(4) Operators in the area under assessment are not involved in conflict timber supply/trade; AND</p> <p>(5) Other available evidence does not challenge 'low risk' designation</p>
2.2. Labour rights are respected including rights as specified in ILO Fundamental Principles and Rights at work.	See detailed analysis below.	Country	<p>Specified risk for right to freedom of association and collective bargaining and for discrimination of women and Roma people in the labour market.</p> <p>The following specified risk thresholds apply:</p> <p>(14) The applicable legislation for the area under assessment contradicts indicator requirement(s); AND</p> <p>(15) There is substantial evidence of widespread violation of key provisions of the ILO Fundamental Principles and Rights at work.</p> <p>Low risk for forced labour and child labour</p> <p>The following low risk threshold applies to forced labour and child labour:</p> <p>(10) Applicable legislation for the area under assessment covers the key principles recognized in the ILO Fundamental Principles and Rights at work (which are recognized as: freedom of association and right to collective bargaining; elimination of forced and compulsory labour; eliminations of discrimination in respect of employment and occupation; and effective abolition of child labour), AND the risk assessment for relevant indicators of Category 1 confirms enforcement of applicable legislation ('low risk'); Or 11.</p>
2.3. The rights of Indigenous and Traditional Peoples are upheld.	See detailed analysis below.	Country	<p>Low risk</p> <p>The following 'low risk' thresholds apply:</p> <p>(16) There is no evidence leading to a conclusion of presence of indigenous and/or traditional peoples in the area under assessment;</p> <p>AND</p>

			(21) Other available evidence do not challenge 'low risk' designation
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Recommended control measures

Indicator	Recommended control measures
2.1	-
2.2	CM should be based on clear evidence that the Organization has policies in place that guarantee core labour rights.
2.3	-

Detailed analysis

Sources of information	Evidence	Scale of risk assessment	Risk indication ¹
Context (the following are indicators that help to contextualize the information from other sources) <ul style="list-style-type: none"> Searching for data on: level of corruption, governance, lawlessness, fragility of the State, freedom of journalism, freedom of speech, peace, human rights, armed or violent conflicts by or in the country, etc. 			
World Bank: Worldwide Governance Indicators - the WGI report aggregate and individual governance indicators for 215 countries (most recently for 2004–2014), for six dimensions of governance: Voice and Accountability; Political Stability and Absence of Violence; Government Effectiveness; Regulatory Quality; Rule of Law; Control of Corruption http://info.worldbank.org/governance/wgi/index.aspx#home	http://info.worldbank.org/governance/wgi/index.aspx#reports (click on table view tab and select Country) In 2014 (latest available year) Poland scores between 70.67 (for Control of Corruption) and 81.77 (for Voice and Accountability) on the percentile rank among all countries for all six dimensions (the scores range from 0 (lowest rank) to 100 (highest rank) with higher values corresponding to better outcomes) .	Country	
World Bank Harmonized List of Fragile Situations:	http://siteresources.worldbank.org/EXTLICUS/Resources/511777-1269623894864/FY15FragileSituationList.pdf Poland does not feature on this list	Country	
Committee to Protect Journalists: Impunity Index CPJ's Impunity Index calculates the number of unsolved journalist murders as a percentage of each country's	https://cpj.org/reports/2015/10/impunity-index-getting-away-with-murder.php Poland does not feature on this list	Country	

¹ A risk indication is provided for each source analyzed, except in the first part that addresses the general country context as that is not a risk indicator. A cumulative risk assessment for each risk indicator is provided in the row with the conclusion on each risk indicator, based on all the sources analyzed and evidence found.

population. For this index, CPJ examined journalist murders that occurred between January 1, 2004, and December 31, 2013, and that remain unsolved. Only those nations with five or more unsolved cases are included on this index.			
Human Rights Watch: http://www.hrw.org	https://www.hrw.org/sites/default/files/world_report_download/wr2016_web.pdf <i>Human Rights Watch World Report 2016</i> There is no chapter on Poland in the country chapters of the HRW World Report 2016. The chapter on the EU contains a paragraph about Poland. “There was little sign of progress in the Krakow Appellate Prosecutor’s longstanding criminal investigation into a secret CIA detention and interrogation program. [...]” In May, the prosecutor general published a report on racist and xenophobic crimes. Despite a significant rise in the number of reported cases, convictions remained low. In June, the European Commission against Racism and Intolerance urged Poland to take further measures in addressing racial crimes, hate speech, and discrimination based on sexual orientation and gender identity. Draft legislation on introducing civil partnership was again rejected by parliament’s lower house in August. Access to reproductive and sexual health rights continued to be restricted, with limited access to legal abortion and comprehensive sex education. [...]” In October, parliament failed to override the president’s veto on legislation that would have significantly improved the legal recognition process for transgender people. [...]” Violence against women remained a serious problem , and continued underreporting of cases limits survivors’ access to services and justice.”	Country	
US AID: www.usaid.gov Search on website for [country] + ‘human rights’	No information found on specified risks after searching Poland + ‘human rights’	Country	
Global Witness: www.globalwitness.org Search on website for [country] + ‘human rights’	No information found on specified risks after searching Poland + ‘human rights’	Country	
http://wwf.panda.org/about_our_earth/about_forests/deforestation/forest_illegal_logging/	http://wwf.panda.org/_core/general.cfc?method=getOriginalImage&ulmgID=%26%2AR%5C%27%21%3EW5%0A Poland does not appear on the Illegal logging map with countries with higher rates of illegal logging. http://indicators.chathamhouse.org/sites/files/reports/Tackling%20Illegal%20Logging%20and%20Related%20Trade_0.pdf “WWF’s EU Government Barometer assessed three aspects of EUTR implementation: whether governments have put in place a legal framework for implementation of the regulation; the level of resources allocated to and	Country	

	actions undertaken for enforcement; and the degree of cooperation both between government agencies and between countries. For each of these three aspects, countries were given a score of 0 (for non-implementation), 1 (part-implementation) or 2 (full implementation); hence six was the maximum score. The country score of Poland is: 1. “ (p. 44)		
Chatham House Illegal Logging Indicators Country Report Card http://www.illegal-logging.info	'This source does not contain information <i>that indicates specified risk</i> '	Country	
Transparency International Corruption Perceptions Index	https://www.transparency.org/cpi2014/results Poland scores 61 points on the Corruption Perceptions Index 2014 on a scale from 0 (highly corrupt) to 100 (very clean). Poland ranks 35 out of 175 with rank nr. 1 being the most clean country.	Country	
Amnesty International Annual Report: The state of the world's human rights -information on key human rights issues, including: freedom of expression; international justice; corporate accountability; the death penalty; and reproductive rights	https://www.amnesty.org/en/documents/pol10/2552/2016/en/ <i>State of the Human Rights Report 2015/16</i> "Parliament failed to reform hate crime legislation. The government committed to relocate 5,000 refugees from Italy and Greece, amid a climate of intolerance and discriminatory speech, fueled by some public officials. The domestic criminal investigation into the co-operation with the CIA and the hosting of a secret detention site was still pending. As of November, the Polish Ombudsman, national NGOs, the National Council of the Judiciary and other authorities expressed concerns regarding respect for the rule of law. They referred to the President's refusal to swear in five constitutional judges who had been elected by the previous Parliament. [...]A new law on media giving the government direct control over management positions in public service broadcasters was widely criticized. On 22 July, 10 Romani women, men and children were forcibly evicted from an informal settlement in the city of Wrocław. They were given no notice by municipal authorities and their houses and belongings were destroyed while they were at work. (p. 296) In April, Poland ratified the Council of Europe Convention on preventing and combating violence against women and domestic violence. However, at the end of the year, authorities had not yet adopted a comprehensive plan to implement the Convention." (p. 296-297)	Country	
Freedom House http://www.freedomhouse.org/	https://freedomhouse.org/report/freedom-world/freedom-world-2016 The status of Poland on the Freedom in the World 2015 index is 'free'. https://freedomhouse.org/report/freedom-net/freedom-net-2015 The status of Poland on the Freedom on the Net 2015 index is 'no data'. https://freedomhouse.org/report/freedom-press/freedom-press-2016	Country	

	The status of Poland on the Freedom of the Press 2016 index is 'free'.		
Reporters without Borders: Press Freedom Index Rank nr. 1 has the best press freedom. https://rsf.org/en/ranking	https://rsf.org/en/ranking <i>2016 World Press Freedom Index</i> Poland is ranked #47 out of 180 in the 2016 World Press Freedom Index with a score of 23.89.	Country	
Fund for Peace - Fragile States Index - the Fund for Peace is a US-based non-profit research and educational organization that works to prevent violent conflict and promote security. The Fragile States Index is an annual ranking, first published in 2005 with the name Failed States Index, of 177 nations based on their levels of stability and capacity http://fsi.fundforpeace.org/	http://fsi.fundforpeace.org/ <i>Fragile States Index 2016</i> Poland is ranked 152 out of 178 countries on the Fragile States Index. (nr 1 being the most failed state). This ranks Poland in the category 'More Stable' (in between "Stable" and "Very stable").	Country	
The Global Peace Index. Published by the Institute for Economics & Peace, This index is the world's leading measure of national peacefulness. It ranks 162 nations according to their absence of violence. It's made up of 23 indicators, ranging from a nation's level of military expenditure to its relations with neighbouring countries and the level of respect for human rights. Source: The Guardian: http://economicsandpeace.org/research/iep-indices-data/global-peace-index	http://economicsandpeace.org/wp-content/uploads/2016/06/GPI-2016-Report_2.pdf <i>2016 Global Peace Index</i> The state of Peace in Poland is labeled 'High' with Poland ranking number 22 out of 163 countries.	Country	
Additional sources of information (These sources were partly found by Googling the terms '[country]', 'timber', 'conflict', 'illegal logging')	Evidence	Scale of risk assessment	Risk indication
	http://www.clientearth.org/commission-opens-infringement-illegal-logging-polish-forest/ <i>Commission takes action over illegal logging in Polish forest</i> 16 June 2016 "The European Commission has started infringement proceedings against the Polish Government over illegal plans to log in Białowieża Forest. The Polish Environment Ministry has one month to respond. The case could end up before the European Court of Justice, with hefty fines for Poland. ClientEarth Lawyer Agata Szafraniuk said: "Starting legal proceedings shows the Commission agrees that the Polish Government violated the law when it decided to increase logging in Białowieża. This contradicts Polish Government claims that the Commission supports felling." The infringement case is based on a possible breach of the Birds and Habitats Directive, EU environmental laws that protect the most valuable natural places in Europe. ClientEarth and six other campaign groups complained to the Commission about the breach, after their concerns were ignored by the Polish Government.		

	<p>The majority of Polish scientists agree that cutting more trees will not protect Białowieża, which is Europe's last surviving primeval forest and a UNESCO World Heritage Site.</p> <p>Commission opens infringement after visiting Białowieża Forest</p> <p>The Commission launched legal proceedings after analyzing documents from the Polish Ministry of Environment and environmental campaigners.</p> <p>Representatives also visited Białowieża Forest last Friday, where they met with the ministry, foresters and campaigners. The visit shows how seriously the Commission takes the issue, as this kind of mission is unusual.</p> <p>The pre-litigation stage began today, when the Commission called on the Polish Ministry of Environment to cancel the illegal logging. If it does not, the Commission will launch a full legal case, asking judges at the EU Court of Justice to rule on the infringement."</p>		
<p>From national CW RA: Info on illegal logging</p> <p>FSC-CW-NRA-PL</p> <p>CONTROLLED WOOD NATIONAL RISK ASSESSMENT FOR POLAND - 2013</p>	<p>"1.3 There is little or no evidence or reporting of illegal harvesting in the district of origin</p> <p><i>Evaluation of compliance with requirements of the indicator on the level of the whole Poland territory:</i></p> <p>In Poland occasional cases of illegal harvesting occur, for example petty larceny of wood from the forest. Each forest owner is obligated to proper forest management according to the law. Wood is harvested according to the approved plan. Forest Guard is constituted for forest protection from illegal harvesting. The Guards cooperate with the police, inspection of road transport, border guard, guard of national parks, game wardens. There are reports of illegal harvesting compiled for particular forest units (Report of eradication of forest detriments). Those statistics show that robberies amount to 0,001% of total harvesting volume. Stolen wood materials are mainly used for local needs or for heating. Apart from occasional cases arbitrated by court, there is no evidence of the scale of illegal harvesting monitored by NO's.</p> <p><i>Basic sources for evaluation of the indicator requirements:</i></p> <p>1. see 1.1.;</p> <p>2. Report of eradication of forest detriments in 2011: http://bip.lasy.gov.pl/pl/bip/px_~raport_lp_2011.pdf?page_opener=http%3A%2F%2Fbip.lasy.gov.pl%2Fpl%2Fbip%2Fraporty_i_prognozy;</p> <p>Risk Assessment: Low</p> <p>Argumentation: the opinions received during consultation pointed to cases of illegal logging within the area of Białowieża, Browsk and Hajnówka Forest Districts (eastern part of Poland) because of the unapproved forest management plan for those units. During the preparation of this document, the forest management plan is approved for this region."</p>		
<p>Conclusion on country context:</p> <p>As EU member state, Poland scores high on most indicators reviewed in this context section such as stability, peace, freedom and governance and is considered a more stable country. Some human rights issues are reported including racist and xenophobic crimes and violence against</p>		Country	

women while there are also concerns regarding respect for the rule of law. There is no evidence that illegal logging is a serious problem in Poland, but there are serious concerns about recent illegal plans to log in Białowieża Forest which is Europe's last surviving primeval forest and a UNESCO World Heritage Site.			
Indicator 2.1. The forest sector is not associated with violent armed conflict, including that which threatens national or regional security and/or linked to military control.			
Guidance <ul style="list-style-type: none"> Is the country covered by a UN security ban on exporting timber? Is the country covered by any other international ban on timber export? Are there individuals or entities involved in the forest sector that are facing UN sanctions? 			
Compendium of United Nations Security Council Sanctions Lists: www.un.org Google: "Consolidated United Nations Security Council Sanctions List" for latest version. It is regularly updated. US AID: www.usaid.gov Global Witness: www.globalwitness.org	https://scsanctions.un.org/fop/fop?xml=htdocs/resources/xml/en/consolidated.xml&xslt=htdocs/resources/xsl/en/consolidated.xsl There is no UN Security Council ban on timber exports from Poland. Poland is not covered by any other international ban on timber export . There are no individuals or entities involved in the forest sector in Poland that are facing UN sanctions .	country	Low risk
From national CW RA FSC-CW-NRA-PL CONTROLLED WOOD NATIONAL RISK ASSESSMENT FOR POLAND - 2013	2.1 There is no UN Security Council ban on timber exports from the country concerned <i>Evaluation of compliance with requirements of the indicator on the level of the whole Poland territory:</i> There is no such a ban for Poland. <i>Basic sources for evaluation of the indicator requirements:</i> 1. UNSC information, UNO : http://www.un.org/esa/ 2. Global Witness: http://www.globalwitness.org Risk Assessment: Low	country	Low risk
Guidance <ul style="list-style-type: none"> Is the country a source of conflict timber? If so, is it at the country level or only an issue in specific regions? If so – which regions? Is the conflict timber related to specific entities? If so, which entities or types of entities? 			
www.usaid.gov Conflict Timber is defined by US AID as: - conflict financed or sustained through the harvest and sale of timber (Type 1), - conflict emerging as a result of competition over timber or other forest resources (Type 2) Also check overlap with indicator 2.3	No information on conflict timber in Poland found.	Country	Low risk
www.globalwitness.org/campaigns/environment/forests	No information on conflict timber in Poland found.	Country	Low risk
Human Rights Watch: http://www.hrw.org/	No information on conflict timber in Poland found.	Country	Low risk

World Resources Institute: Governance of Forests Initiative Indicator Framework (Version 1) http://pdf.wri.org/working_papers/gfi_tenure_indicators_sep09.pdf Now: PROFOR http://www.profor.info/node/1998	This work resulted in a publication: Assessing and Monitoring Forest Governance: A user's guide to a diagnostic tool (available on this page) published by PROFOR in June 2012. This tool has not yet been applied to Poland.	Country	-
Amnesty International Annual Report: The state of the world's human rights -information on key human rights issues, including: freedom of expression; international justice; corporate accountability; the death penalty; and reproductive rights http://www.amnesty.org	https://www.amnesty.org/en/documents/pol10/0001/2015/en/ No information on conflict timber related to Poland found.	Country	Low risk
World Bank: Worldwide Governance Indicators - the WGI's report aggregate and individual governance indicators for 213 economies (most recently for 2004–2014), for six dimensions of governance: Voice and Accountability; Political Stability and Absence of Violence; Government Effectiveness; Regulatory Quality; Rule of Law; Control of Corruption http://info.worldbank.org/governance/wgi/index.aspx#home Use indicator 'Political stability and Absence of violence' specific for indicator 2.1	In 2014 (latest available year) Poland scores 76.70 for Political Stability and Absence of Violence/Terrorism (the scores range from 0 (lowest rank) to 100 (highest rank) with higher values corresponding to better outcomes).	Country	Low risk
Greenpeace: www.greenpeace.org Search for 'conflict timber [Poland]'	No information on conflict timber in Poland found.	Country	Low risk
CIFOR: http://www.cifor.org/ http://www.cifor.org/publications/Corporate/FactSheet/forests_conflict.htm	No information on conflict timber or illegal logging in Poland found.	Country	Low risk
Google the terms '[Poland]' and one of following terms or in combination 'conflict timber', 'illegal logging'	No other information on conflict timber in Poland found.	Country	Low risk
From national CW RA FSC-CW-NRA-PL CONTROLLED WOOD NATIONAL RISK ASSESSMENT FOR POLAND - 2013	2.2 The country or district is not designated a source of conflict timber (e.g. USAID Type 1 conflict timber) <i>Evaluation of compliance with requirements of the indicator on the level of the whole Poland territory:</i> According to the latest information, Poland is not a source of conflict timber. <i>Basic sources for evaluation of the indicator requirements:</i> USAID information: www.usaid.gov . Risk Assessment: Low	country	Low risk
Conclusion on indicator 2.1: No information was found on Poland as a source of conflict timber and the forest sector is not associated with any violent armed conflict. The following low risk thresholds apply:		country	Low risk

<p>(1) The area under assessment is not a source of conflict timber ; AND (2) The country is not covered by a UN security ban on exporting timber; AND (3) The country is not covered by any other international ban on timber export; AND (4) Operators in the area under assessment are not involved in conflict timber supply/trade; AND (5) Other available evidence does not challenge 'low risk' designation.</p>			
<p>Indicator 2.2. Labour rights are respected including rights as specified in ILO Fundamental Principles and Rights at work.</p>			
<p>Guidance</p> <ul style="list-style-type: none"> • Are the social rights covered by the relevant legislation and enforced in the country or area concerned? (refer to category 1) • Are rights like freedom of association and collective bargaining upheld? • Is there evidence confirming absence of compulsory and/or forced labour? • Is there evidence confirming absence of discrimination in respect of employment and/or occupation, and/or gender? • Is there evidence confirming absence of child labour? • Is the country signatory to the relevant ILO Conventions? • Is there evidence that any groups (including women) feel adequately protected related to the rights mentioned above? • Are any violations of labour rights limited to specific sectors? 			
<p>general sources from FSC-PRO-60-002a V1-0 EN</p>		<p>information found and specific sources</p>	
<p>Status of ratification of fundamental ILO conventions: http://www.ilo.org/dyn/normlex/en/f?p=1000:11001:0::NO:: C29 Forced Labour Convention, 1930 C87 Freedom of Association and Protection of the Right to Organise Convention, 1948 C98 Right to Organise and Collective Bargaining Convention, 1949 C100 Equal Remuneration Convention, 1951 C105 Abolition of Forced Labour Convention, 1957 C111 Discrimination (Employment and Occupation) Convention, 1958 C138 Minimum Age Convention, 1973 C182 Worst Forms of Child Labour Convention, 1999</p> <p>Ratification as such should be checked under Category 1. In Cat. 2 we take that outcome into consideration. Refer to it.</p>		<p>http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102809 Poland has ratified all the 8 Fundamental ILO Conventions. The status on the ILO website for all 8 Conventions is 'in force'. http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:3256747:NO <i>Observation (CEACR) - adopted 2015, published 105th ILC session (2016)</i> <i>Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) - Poland (Ratification: 1957)</i> "The Committee notes that an ILO mission visited Poland from 14 to 16 May 2014 following the Government's request for technical assistance. It also notes with interest the establishment of the Social Dialogue Council, a new tripartite institutional forum replacing the Tripartite Commission for Social and Economic Affairs. [...] Article 2 of the Convention. Right of workers, without distinction whatsoever, to establish and join trade unions of their own choosing. In its previous comments, the Committee noted that, according to section 2(1) of the 1991 Act on Trade Unions, the right to form and join trade unions was not granted to those persons who had entered into an employment relationship on the basis of civil law contracts, since they did not fall under the definition of "employee" in section 2 of the Labour Code. The Committee had welcomed the initiatives on potential improvements to the legislation and hoped that any legislative reform</p>	
		<p>Country</p>	<p>Low risk</p>
		<p>Country</p>	<p>Specified risk for Right to form and join trade unions for persons</p>

	<p>would bring national law into conformity with the Convention. The Committee notes with interest, on the basis of the information provided by the Government in its report, that: (i) following the technical advice provided by the ILO mission on the possibility and implications of extending the right to form and establish trade unions taking into account the specificity of work performed under civil law contracts, the Ministry of Labour and Social Policy prepared in 2014 a new draft Act amending the Act on Trade Unions, which extends the right to establish and join trade unions to persons performing outwork, the self-employed and those who work on the basis of civil law contracts; (ii) in June 2015, following a motion submitted by All-Poland Alliance of Trade Unions (OPZZ), the Constitutional Tribunal passed a verdict holding that section 2(1) of the Act on Trade Unions is contrary to the Constitution of the Republic of Poland, as the reference to the definition of “employee” in section 2 of the Labour Code does not guarantee the possibility of associating in trade unions to all people covered by the constitutional guarantees; and that the legislator should extend the right to organize to all persons performing paid work on the basis of a legal relationship; (iii) the Ministry of Labour and Social Policy is currently working to analyse the consequences of the judgment for the scope and coherence of the new draft Act; and (iv) due to its much larger personal scope, the draft Act introduces a systemic change that requires consultations with the social partners, which will be undertaken in the newly established Social Dialogue Council. The Committee trusts that the draft Act will be adopted in the near future and will guarantee the right of all workers, without distinction whatsoever, including workers without an employment contract, to establish and join organizations of their own choosing, with the sole exception of members of the armed forces and the police. The Committee requests the Government to provide information on any progress made in this respect. [...]Lastly, the Committee notes with interest the detailed statistical information provided by the Government, according to which, in 2014, there were 12,900 active trade union organizations, with a total of 1.6 million members (5 per cent of adult population), and the majority of enterprise unions operated within public sector entities (66 per cent).”</p> <p>http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:3256568:NO</p> <p><i>Observation (CEACR) - adopted 2015, published 105th ILC session (2016)</i> <i>Right to Organise and Collective Bargaining Convention, 1949 (No. 98) - Poland (Ratification: 1957)</i> “The Committee notes the observations from the International Trade Union Confederation (ITUC) received on 1 September 2015 and on 1 September 2014, which concern allegations of anti-union dismissals and other acts of anti-union discrimination, as well as the Government’s comments thereon. It also notes the observations of the National Commission of the Independent and Self-Governing Trade Union (NSZZ) “Solidarnosc” received on 26 August</p>	<p>who entered into an employment relationship on the basis of civil law contracts</p>
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	<p>2015, which mainly relate to legislative issues raised under the Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87). Lastly, the Committee notes the Government's comments on the 2012 ITUC observations concerning allegations of anti-union dismissals in various sectors of activity.</p> <p>Article 1 of the Convention. Effective protection against anti-union discrimination. The Committee had previously noted, in the context of earlier allegations of inefficiency of the proceedings and sanctions established in the legislation, the various legislative provisions enumerated by the Government providing protection against anti-union discrimination (article 59(1) of the Constitution; sections 18, 38 and 45(1) of the Labour Code; and the penalties under section 218(1) of the Penal Code and section 35(1) of the Act on Trade Unions of 1991), as well as relevant statistical information. The Committee requested the Government to submit statistics on the number of new cases concerning anti-union practices brought before the courts. Furthermore, in view of earlier allegations that victims of anti-union dismissals could ask for reinstatement but court proceedings could take up to two years, the Committee had noted the Government's reference to a possible amendment to the Code of Civil Procedure so that, in cases of anti-union discrimination, the persons concerned may remain in their jobs during the proceedings; and had requested the Government to provide information in this respect.</p> <p>The Committee notes that the Government refers to sections 11 (prohibition of discrimination in employment on the grounds of, inter alia, trade union membership) and 47 of the Labour Code (right of reinstated employee to remuneration for not more than two months or, in the case of employees under special protection, for the entire period being unemployed) and section 32 of the Act on Trade Unions (special protection in the form of prohibition to terminate or unilaterally change conditions of employment without the consent of the trade union board, for a certain proportion of trade union officials). The Committee also notes the statistical information provided by the Government on the number of cases brought to courts for discrimination in employment (before the district courts 139 in 2012, 98 in 2013 and 79 in 2014; before the regional courts 14 in 2012, 14 in 2013 and 12 in 2014), their duration in days (before district courts 225 in 2012, 285 in 2013 and 249 in 2014; before regional courts 365 in 2012, 274 in 2013 and 511 in 2014) and their outcome; the number of sanctions imposed by courts; and the number of complaints against anti-union discrimination brought before the National Labour Inspectorate (17 in 2012 as of July; 37 in 2013; 37 in 2014; and five in 2015 until June) and their outcome, including concrete examples of cases in which inspections have been undertaken and their outcome. Lastly, the Committee takes note of the Government's indication that at present, the Ministry of Justice does not envisage any amendments to the Code of Civil Procedure.</p>		
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	<p>Taking into account the numerous allegations of acts of anti-union discrimination, the Committee observes with concern the extremely low number of sanctions imposed for cases of anti-union discrimination or interference under section 35(1) of the Trade Union Act (zero in 2010; two in 2011; six in 2012; zero in 2013; and zero in 2014), and also notes a decrease by half in the number of sanctions imposed for infringements of workers' rights in general under section 218(1) of the Penal Code (434 in 2010; 358 in 2011; 203 in 2012; 179 in 2013; and 172 in 2014). The Committee requests the Government to provide explanations in regard to these numbers and to take any necessary measures to ensure the effective protection against acts of anti-union discrimination in practice.</p> <p>In the same context, the Committee observes with concern that in the two concrete examples of cases supplied by the Government in which inspection has been undertaken and a court ruling issued, the fines imposed for the termination of employees under special protection without the trade union's consent (section 32 of the Trade Union Act), amounted, per dismissed employee, to 1,700 Polish zloty (PLN) (approximately US\$425) and PLN1,500 (approximately US\$375), respectively. The Committee considers that such level of fines imposed on the employers, which corresponds to half of the national average monthly wage, are too low to be sufficiently dissuasive. In view of the recurrent allegations of numerous acts of anti-union dismissals, the Committee invites the Government to raise the level of fines imposed on employers in such cases, in order to ensure that the sanctions established and enforced are sufficiently dissuasive to prevent future acts of anti-union discrimination."</p> <p>http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:3188158:NO</p> <p><i>Direct Request (CEACR) - adopted 2014, published 104th ILC session (2015) Equal Remuneration Convention, 1951 (No. 100) - Poland (Ratification: 1954)</i></p> <p>"The Committee notes the observations of the Employers of Poland (EP) supported by the International Organisation of Employers (IOE), received on 22 September 2014, which concern issues relating to the assessment of the gender pay gap and objective job evaluation, addressed by the Government in its report.</p> <p>Articles 1 and 2 of the Convention. Work of equal value. Legislation. The Committee recalls its previous comments regarding section 183c, paragraph 3, of the Labour Code which refers to work of equal value as work requiring comparable professional qualifications, responsibilities and effort, and case law of the Supreme Court concerning the comparability of positions that are "unique in the whole organisational structure of the employer". The Committee notes that the Government does not provide information in this respect.</p>	Country	Specified risk for anti-union discrimination
		Country	Specified risk for equal

	<p>Recalling that the Convention does not limit the application of the principle of equal remuneration to the same enterprise and that the possibility of bringing equal pay claims should not be excluded due to the fact that no comparator is available within the enterprise (see General Survey on the fundamental Conventions, 2012, paragraph 699) the Committee once again asks the Government to indicate how men and women are protected from discrimination in respect of remuneration in accordance with the principle of the Convention.</p> <p>Assessment of the gender pay gap. The Committee notes the Government's indication that, due to discrepancies in available data, it is difficult to specify the extent of the gender pay gap. The Committee notes that both the Government and the EP refer to Eurostat data indicating that in 2012 the gross pay gap between men and women was 6.4 per cent, up from 4.5 per cent in 2010, but overall a decrease of more than 8 per cent since 2007. The Government also provides data from the Central Statistics Office that in 2012 the average remuneration of women was 20 per cent lower than that of men, and with respect to average hourly gross remuneration, the gap was 13.5 per cent. Women also continue to earn less in posts as higher officials, in managerial posts for business services and management, in posts of industrial workers and in the services sector. The Committee further notes, from the inspection carried out in 2013 by the Supreme Audit Office (SAO) on equal remuneration for men and women in the public sector that disparities in wages in this sector amount to 10.82 per cent. Differences in the average remuneration of men and women ranged from 15.23 per cent (in favour of women) to 30.48 per cent for basic pay, and from 30.3 per cent to 37 per cent for total pay (including bonuses and allowances). Of the posts analysed, men had higher basic pay in almost 80 per cent of the cases. The Committee notes that in 2012 the Government established an informal team within the Ministry of Labour and Social Policy to address the wage gap, involving representatives of non-governmental organizations, the private sector and academia. The Government also indicates that the National Programme of Activities for Equal Treatment 2013–16 provides for measures aimed at reducing the gender wage gap, including promoting the principle of equal remuneration for work of equal value. The EP draws attention to the need for measures to address individual factors causing wage differences between men and women (education, position, length of service, etc.), including promoting those aimed at reconciling work and family responsibilities. The Committee asks the Government to continue to provide detailed statistical information on the remuneration of men and women in the public and private sectors, disaggregated by economic sector and occupation, and information on any measures taken to identify and address the underlying causes of gender-based differences in the payment of bonuses and allowances in the public service. The Committee asks the Government to continue to provide information on the measures taken or envisaged, including in the framework of the National Programme of Activities</p>	Country	<p>remuneration</p> <p>Specified risk for gender pay gap</p>
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	<p>for Equal Treatment 2013–16, to reduce the gender pay gap and promote the principle of the Convention.</p> <p>Article 3. Objective job evaluation. The Committee notes that the 2013 SAO inspection in the public sector attributed the gender pay gap to the organizational structure of departments, as well as differences in qualifications, work experience, professional experience, competencies and commitment of employees. The Committee notes the comments by the EP that the inspection allowed employers to appreciate data regarding pay differences which resulted in two controlled entities raising the salaries of women. The EP considers that a tool to monitor wage differentiation along with objective measures to establish the impact of individual factors on remuneration levels could positively affect how remuneration levels are shaped. The Committee notes that the Government organized meetings with the social partners in order to evaluate the tools for eliminating differences in remuneration of women and men and that the National Programme of Activities for Equal Treatment for 2013–16 seeks to develop a methodology to evaluate the gender pay gap in enterprises. The Committee hopes that the methodology developed to evaluate gender pay gaps leads to the development and promotion of objective job evaluation free from gender bias in the private sector and asks the Government to provide information on progress made in this regard. The Committee also asks the Government to continue to provide information on any objective job evaluation exercises undertaken, in cooperation with the social partners, in the public sector, including the results achieved.</p> <p>Enforcement. The Committee notes from the information provided by the Government that, between January 2010 and 15 April 2014, 52 complaints of gender discrimination were submitted to the labour inspectorate which related to “remuneration for work or other conditions of employment”; as a result, 37 inspections were carried out and 11 queries were addressed to employers. Since 2011, only three cases have been recorded as “justified complaints.” The Government indicates that the labour inspectorate faces difficulties in overseeing compliance with the principle of equal pay for work of equal value, primarily due to a lack of appropriate tools and objective measuring instruments with regard to wage differentiation. The Government also provides information on cases decided by the Supreme Court in 2012 and 2013 relating to equal remuneration for the same work. The Committee asks the Government to continue to provide information on the activities of the labour inspectorate with respect to the principle of the Convention, and to indicate the outcome of any cases of pay discrimination. The Committee asks the Government to indicate the steps taken or envisaged to strengthen the capacity of the labour inspectorate to monitor wage differentials, including the provision of appropriate tools to evaluate whether jobs performed by men and women are of equal value. Please continue to provide information on relevant judicial decisions regarding the application of the Convention.”</p>		
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	<p>http://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID:3188168:NO</p> <p><i>Direct Request (CEACR) - adopted 2014, published 104th ILC session (2015) Discrimination (Employment and Occupation) Convention, 1958 (No. 111) - Poland (Ratification: 1961)</i></p> <p>"The Committee notes the observations of the trade union NSZZ "Solidarnosc," received on 3 September 2014, and the Government's reply thereto, received on 1 October 2014.</p> <p>[...] Sexual harassment. The Committee notes that 51 complaints of sexual harassment were addressed to the national labour inspectorate between 2011 and the first quarter of 2014, 18 of which turned out to be unjustified; for 26 complaints, it was impossible to establish whether they were grounded or ungrounded (due to lack of objective verifiable circumstances). The Committee notes the difficulties faced by the labour inspectorate in examining complaints due to a lack of material evidence and an unwillingness of colleagues to act as witnesses. The Committee notes from the statistical data provided that several cases of sexual harassment were decided by the labour and district courts between 2010 and 2014. The Committee requests the Government to indicate any measures taken or envisaged to improve the handling of sexual harassment complaints by labour inspectors, and to continue to provide information on the outcome of such complaints, including sanctions imposed and remedies provided. Please continue to provide information on court decisions and on the effective measures taken to promote awareness of the issue of sexual harassment at work, and any cooperation with workers' and employers' organizations in this regard.</p> <p>[...]Equality of opportunity and treatment irrespective of race, colour and national extraction. The Committee notes the Government's indications that the Roma remain the most marginalized group in the labour market; only 11 per cent of Roma have a secondary and post-secondary education, and only 29 per cent are economically active. The Committee notes that the Government has taken measures to increase opportunities for the Roma in the labour market and that access to education has been a priority this regard; assistance has been provided through education grants, professional courses and internships directed at the Roma community funded by the European Social Fund. The Committee also notes the use of social campaigns to eliminate stereotypes regarding the Roma, and the Government's participation in activities supporting diversity in the workplace including cooperation with the Responsible Business Forum. Lastly, the Committee notes from information submitted by the Government to CEDAW, the measures taken to implement programmes for the Roma community, including Roma women, and that the National Programme of Activities for Equal Treatment 2013–16 also provides</p>	Country	Low risk for sexual harassment
		country	Specified risk for discrimination of Roma in the labour market

	for the preparation of the Roma Community Integration Programme for 2014–20 (CEDAW/C/POL/Q/7-8/Add.1, pages 6–7). The Committee requests the Government to continue to provide information on measures taken, and results achieved, to raise the level of education and vocational training of the Roma community, to ensure their access to a wide range of occupations, and to combat negative stereotypes and anti-Roma sentiments. Please include statistical information on the participation of Roma men and women, as well as persons belonging to other ethnic minorities, in education and the labour market. The Committee also requests the Government to indicate the concrete measures taken to prevent and address discrimination based on race, colour or national extraction in employment and occupation within the framework of the National Programme of Activities on Equal Treatment (2013–16) and the Roma Community Integration Programme, including activities carried out in cooperation with the social partners.		
ILO Declaration on Fundamental Principles and Rights at Work. Country reports. http://www.ilo.org/declaration/lang--en/index.htm Source of several reports. Search for 'racial discrimination', 'child labour', 'forced labour', 'gender equality', 'freedom of association'	'No information indicating specified risk was found.'	Country	Low risk
ILO Child Labour Country Dashboard: http://www.ilo.org/ipecc/Regionsandcountries/lang--en/index.htm	Poland does not feature in the Child Labour Country Dashboard	Country	Low risk
Global March Against Child Labour: http://www.globalmarch.org/	'No information indicating specified risk was found.'	Country	Low risk
Office of the United Nations High Commissioner for Human Rights (OHCHR), Committee on Rights of the Child: http://www.ohchr.org/EN/HRBodies/CRC/Pages/CRCIndex.aspx	http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CRC%2fC%2fPOL%2fCO%2f3-4&Lang=en <i>Committee on Rights of the Child - Concluding observations on the combined third and fourth periodic reports of Poland - 30 October 2015</i> The report does not mention child labour.	Country	Low risk
Committee on the Elimination of Discrimination against Women http://www.ohchr.org/en/hrbodies/cedaw/pages/cedawindex.aspx (Use the link to 'Key documents' on the left hand side. Go to "observations" and search for country.) (Refer to CW Cat. 1) Or: Right top select country click on CEDAW treaty, click on latest reporting period and select concluding observations	http://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CEDAW%2fC%2fPOL%2fCO%2f7-8&Lang=en <i>Committee on the Elimination of Discrimination against Women - Concluding observations on the combined seventh and eighth periodic reports of Poland – 14 November 2014</i> "Employment 32. The Committee is concerned about the prevailing horizontal and vertical segregation between women and men in the labour market and in particular the concentration of women in low-paid sectors of public employment, especially in precarious work, the limited participation of women in employment (53.4 per cent of women of working age), the lack of counselling for girls and women on non-traditional educational and vocational choices and career options and non-implementation of the principle of equal pay for work of equal value. It is also concerned about the limited mandate of	Country	Specified risk for equal

	<p>the labour inspectorate to investigate complaints of gender discrimination and in particular, sexual harassment, and the disparities in access to childcare services between urban and rural areas.</p> <p>33. The Committee recommends that the State party:</p> <p>(a) Eliminate horizontal and vertical segregation between women and men in the labour market, including by adopting temporary special measures to promote access for women, in particular young women, to employment, and review its legislation and policies in order to promote equal opportunities for and equal treatment of women in employment, including career opportunities, and to limit the exposure of women to precarious work;</p> <p>(b) Develop support programmes, including counselling, for girls and women on non-traditional educational and vocational choices and career options, for example in the areas of science and technologies;</p> <p>(c) Ensure equal remuneration for work of equal value, including through mandatory equality plans for public and private employers and labour inspections, and address the limited effectiveness of legal provisions on remuneration, in particular through the development of a methodology for the assessment of the wage gap in companies as well as awareness-raising within the State party's associations of employers and trade unions;</p> <p>(d) Strengthen the mandate of the labour inspectorate to effectively investigate complaints of gender discrimination and in particular, sexual harassment, including by addressing the conditions for the disclosure of information about complaints and their authors;</p> <p>(e) Reduce disparities in access to childcare services between urban and rural areas, including by reversing the trend of closing preschool facilities.</p> <p>34. The Committee notes the measures taken to promote the participation of women in private sector management and supervisory boards. It is concerned, however, that women represent less than 15 per cent of the members of management and supervisory boards.</p> <p>35. The Committee urges the State party to take measures to achieve women's equal and full participation in decision-making in the economic sphere, in particular in the management and supervisory boards of listed companies and State-owned public companies.</p> <p>Rural women</p> <p>38. The Committee takes note of the State party's Rural Development Programme 2007-2013. However, it is concerned that rural women continue to suffer from limited access to health care, education, employment and social services and participation in decision-making processes at the local level.</p> <p>39. The Committee recommends that the State party develop comprehensive policies and programmes aimed at the economic and political empowerment of rural women and ensure their access to health care, education, employment and social services, as well as facilitate their</p>		remuneration
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	participation in decision-making processes at the local level, in particular in the boards of voivodeship agricultural chambers, so as to address the high risk of female poverty in rural areas.		
Human Rights Watch: http://www.hrw.org/	'No information indicating specified risk was found.' in relation to labour rights.	country	Low risk
Child Labour Index 2014 produced by Maplecroft. http://maplecroft.com/portfolio/new-analysis/2013/10/15/child-labour-risks-increase-china-and-russia-most-progress-shown-south-america-maplecroft-index/	Poland scores 'medium risk' on the Child Labour Index.	Country	Specified risk on child labour
http://digitalcommons.ilr.cornell.edu/cgi/viewcontent.cgi?article=2191&context=globaldocs (p. 30-33 are specific on timber)	'No information indicating specified risk was found.' in relation to labour rights.	country	Low risk
The ITUC Global Rights Index ranks 139 countries against 97 internationally recognised indicators to assess where workers' rights are best protected, in law and in practice. The Survey provides information on violations of the rights to freedom of association, collective bargaining and strike as defined by ILO Conventions, in particular ILO Convention Nos. 87 and 98 as well as jurisprudence developed by the ILO supervisory mechanisms. There are 5 ratings with 1 being the best rating and 5 being the worst rating a country could get. http://www.ituc-csi.org/new-ituc-global-rights-index-the?lang=en	http://www.ituc-csi.org/IMG/pdf/survey_ra_2016_eng.pdf <i>The ITUC Global Rights Index 2016</i> Poland is classified in Rating 4 "Systematic violation of rights" (p. 13) "Workers in countries with the rating 4 have reported systematic violations. The government and/or companies are engaged in serious efforts to crush the collective voice of workers putting fundamental rights under threat." (p. 19)	country	Specified risk for rights to freedom of association, collective bargaining and strike
Gender wage gap (in OECD countries) http://stats.oecd.org/index.aspx?queryid=54751	http://stats.oecd.org/index.aspx?queryid=54751 The gender wage gap for Poland in the latest available year (2014) is 11,1 %. The OECD average is not presented in this chart, but Poland appears to be well below the OECD average.	country	Low risk.
World Economic Forum: Global Gender Gap Index http://reports.weforum.org/global-gender-gap-report-2015/ Search for country rankings for the adjusted and the unadjusted pay gap	http://reports.weforum.org/global-gender-gap-report-2015/economies/#economy=POL <i>Global Gender Gap Index 2015 - Poland.</i> Poland ranks no. 51 out of 142 countries with a score of 0.715. (The highest possible score is 1 (equality) and the lowest possible score is 0 (inequality)). On the more specific sub-index on Economic participation and opportunity Poland ranks no. 75 with a score of 0.667. Within that index, the most specific and relevant indicator is the Wage equality for similar work . Here Poland ranks only no. 124 on the with a score of 0.52 which is below the global average (of 142 included countries).	country	Specified risk for equal remuneration for women
use, if applicable: http://www.ilo.org/global/research/global-reports/global-wage-report/lang--en/index.htm <i>Global Wage Report</i> (Use latest version)	http://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/---publ/documents/publication/wcms_324678.pdf <i>Global Wage Report 2014/15</i> The actual gender wage gap minus the explained gender wage gap (taking into account i.e. education, experience, economic activity, location, work intensity and occupation) for Poland is 16% (12 % plus 4 % - explained gender wage	country	Low risk for gender wage gap

<p>"The Global Wage Report analyses the evolution of real wages around the world, giving a unique picture of wage trends and relative purchasing power globally and by region."</p>	<p>gap is negative). This percentage represents the unexplained gender wage gap which may capture discriminatory practices. The average unexplained gender wage gap for Europe is 20%. Poland is below the European average. (Figure 37, p. 49)</p>		
<p>http://www.globalslaveryindex.org/ The Global Slavery Index estimates the number of people in modern slavery in 167 countries. The Global Slavery Index answers the following questions: What is the estimated prevalence of modern slavery country by country, and what is the absolute number by population? How are governments tackling modern slavery? What factors explain or predict the prevalence of modern slavery?</p>	<p>http://www.globalslaveryindex.org/country/poland/ Poland ranks 24 out of 167 countries. "The 2016 Global Slavery Index estimates 181,100 people or 0.48% percent of the total population live in conditions of modern slavery in Poland. This is based on a random-sample, nationally representative survey undertaken in 2015, that sought to identify instances of both forced marriage and forced labour within the general population (survey conducted in Polish language). The lowest percentage is 0.018% and the highest percentage is 4.373%.</p> <p>Forced labour Forced labour affects migrant populations within Poland and Polish citizens migrating overseas. Walk Free Foundation survey data suggests construction (45 percent), domestic labour (31 percent), other manual labour (eight percent), and manufacturing (six percent) were sectors of concern. Within Poland, migrant labourers from nearby Eastern European countries, such as Ukraine, Bulgaria and Romania,[2] and parts of South East Asia, are vulnerable to exploitation in the construction, agriculture, retail and domestic sectors.[3]</p> <p>While previously victims of exploitation were predominately from the former Soviet Union, there has been a shift in recent years to an increase in the number of identified victims from Asia,[4] including Vietnam, the Philippines, China and Korea.[5] In 2014, the Border Guard identified 31 victims of forced labour, 19 of whom originated from the Philippines. When cases of domestic servitude are included, this figure increases to 34 forced labour victims, of which 21 were from the Philippines.[6] A study released by the European Alliance for Human Rights in North Korea implicated Polish firms in the use of North Korean forced labour. As many as 800 North Koreans are believed to be working in the country, primarily in shipyards and orchards.[7] Even those migrants who legally enter the country may become subject to forced labour. In 2010, 58 Thai migrant workers who entered the country with work permits, for example, were made to work excessive hours, received limited food and were not paid full wages.[8]"</p>	<p>country</p>	<p>Low risk for slavery or forced labour</p>
<p>Google the terms '[Poland]' and one of following terms 'violation of labour rights', 'child labour', 'forced labour', 'slave labour', 'discrimination', 'gender pay/wage gap', 'violation of labour union rights' 'violation of freedom of association and collective bargaining'</p>	<p>http://www.thenews.pl/1/9/Artykul/251284.Polish-PM-abolishes-antidiscrimination-council <i>Polish PM abolishes anti-discrimination council - 04.05.2016 10:00</i> Prime Minister Beata Szydło has abolished Poland's Council for the Prevention of Racial Discrimination, Xenophobia and Related Intolerance, it emerged on Tuesday night.</p>	<p>Country</p>	<p>Specified risk on discrimination</p>

	<p>The council was abolished by a Law and Justice government decree on 27 April.</p> <p>The body had been established in 2011 under the tenure of Prime Minister Donald Tusk (current president of the European Council), of the centrist Civic Platform party.</p> <p>Among other factors, the council was tasked with ensuring coordination between government institutions and local government bodies, as well with other groups involved in preventing racial discrimination, xenophobia and related intolerance. The council also monitored and analyzed spheres where such discrimination was occurring.</p> <p>The decree to abolish the council comes into force on 1 June. It is not clear at present whether the prime minister intends to establish a body that carries out similar work.</p> <p>In March, Poland's human rights Ombudsman outlined that in recent months there has been an upsurge in hate speech and violence against foreigners. Besides the Ombudsman, the Ministry of Sport and Tourism objected to the abolition, but they were overruled.</p> <p>Deputy Minister of Sport Ryszard Szuster had argued that the council "is currently the only body providing coordination of governmental institutions, local government bodies and other entities in preventing and combating discrimination and intolerance." (nh)</p> <p>Source: dziennik.pl"</p> <p>http://survey.ituc-csi.org/Poland.html?lang=en#tabs-3</p> <p>The ITUC global rights Index – Poland – In Practice</p> <p>This site shows many examples of violations of the right to freedom of association, collective bargaining and strike in Poland.</p> <p>http://www.state.gov/documents/organization/253099.pdf</p> <p><i>Country Reports on Human Rights Practices for 2015</i> <i>United States Department of State • Bureau of Democracy, Human Rights and Labor - POLAND 2015 HUMAN RIGHTS REPORT</i></p> <p>[...] Sexual Harassment</p> <p>The law prohibits sexual harassment, and violations carry penalties of up to three years in prison. The law defines sexual harassment as discriminatory behavior in the workplace, including physical, verbal, and nonverbal acts violating an employee 's dignity.</p> <p>According to the Women' s Rights Center, sexual harassment continued to be a serious and underreported problem. Many victims did not report abuse or withdrew harassment claims in the course of police investigations due to shame or fear of losing their job. During the first six months of the year, police reported 29 cases of sexual harassment, compared with 52 cases during the first six months of 2014.</p> <p>[...]Discrimination</p>	Country	Specified risk for freedom of association, collective bargaining and strike
		Country	Specified risk for sexual harassment

	<p>The constitution provides for the same legal status and rights for men and women and prohibits discrimination against women, although few laws exist to implement the provision. The constitution requires equal pay for equal work, but discrimination against women in employment existed (see section 7.d.).</p> <p>The plenipotentiary for equal treatment had a mandate to counter discrimination and promote equal opportunity for all. (p. 18)</p> <p>[...]</p> <p>Societal discrimination against Roma, whose numbers were estimated to be Between 20,000 and 30,000, continued to be a problem. The 2011 national census recorded 16,723 Roma, although an official government report on the Romani community estimated that 20,000 -25,000 Roma resided in the country.</p> <p>Romani community representatives estimate that 30,000 -35,000 Roma reside in the country. Unlike in previous years, there were no reports that local officials discriminated against Roma by denying them adequate social services. Romani leaders complained of widespread discrimination in employment, housing, banking, the justice system, the media, and education. [...]While at the national level approximately 80 percent of Roma were unemployed, levels of unemployment in some regions reached nearly 100 percent. (p. 22-23)</p>	Country	Specified risk for discrimination of Roma in the labour market
	<p>“Section 7. Worker Rights</p> <p>a. Freedom of Association and the Right to Collective Bargaining</p> <p>The law provides for the rights of workers to form and join independent trade unions, bargain collectively, and conduct legal strikes. The law prohibits antiunion discrimination, and provides legal measures under which workers fired for union activity may demand reinstatement. There are several legal restrictions to these rights. The law does not provide for the right to form a union to persons who entered into an employment relationship based on a civil law contract, or to persons who were self-employed. On June 2, the Constitutional Court ruled that any limitation to the freedom of association violates the constitution and required the government and parliament to amend the law on trade unions, but as of October 30, the government had not revised the law.</p> <p>[...]Legal strikes require the support of at least 50 percent of all employees in a company or industry-level vote. To allow for required mediation, a strike may not be called less than 14 days after workers present their demands to an employer. The law obligates employers to notify the district inspection office in their region about a group dispute in the workplace. Cumbersome procedures made it difficult for workers to meet all of the technical requirements for a legal strike. What constitutes a strike under the labor law is limited to strikes over wages and working conditions.</p> <p>[...]The penalties for obstructing trade union activity range from fines to</p>	country	Specified risk for the right to form a union to persons with employment relationship based on a civil law contract, or are self-employed
	<p>[...]The penalties for obstructing trade union activity range from fines to</p>	Country	specified risk for the

	community service. The government did not effectively enforce applicable laws. Resources, inspections, and remediation efforts were less than fully adequate and the small fines imposed as punishment were an ineffective deterrent to employers. Administrative and judicial procedures were subject to lengthy delays and appeals. Unions alleged that the government did not consistently enforce laws prohibiting retribution against strikers. In 2014 the National Labor Inspectorate (NLI) registered 254 disputes over working conditions, social benefits, and the right to freedom of trade union activity, filed under collective bargaining rules as a prerequisite for striking. [...]Violations of freedom of association and the right to collective bargaining occurred. There were some reports of government interference in trade union activity. While many workers exercised the right to organize and join unions, many small- and medium-sized firms, which employed a majority of the workforce, discriminated against those who attempted to organize. Labor leaders continued to report that employers regularly discriminated against workers who attempted to organize or join unions, particularly in the private sector. Discrimination typically took the forms of intimidation, termination of work contracts without notice, and closing of the workplace. Some employers sanctioned employees who tried to organize unions." (p. 25-26)	Country	right to strike
		Country	specified risk for labour rights
	b. Prohibition of Forced or Compulsory Labor The law prohibits all forms of forced or compulsory labor. Nevertheless, forced labor occurred. While the government effectively enforced the law, there were some limitations with respect to identification of victims of forced labor and distinguishing between forced labor and labor rights violations. Penalties for forced labor violations ranged from three to 15 years' imprisonment and were sufficiently stringent compared with other serious crimes. In 2014, the last year for which statistics were available, the government assisted in removing 71 victims from forced labor. There were reports that foreign and domestic men were subjected to forced labor in the agricultural, manufacturing, and food processing sectors and that men, women, and children were subjected to forced begging. (p. 26-27)	Country	Specified risk for union rights
	c. Prohibition of Child Labor and Minimum Age for Employment The law prohibits the employment of children under age 16, with exceptions in the cultural, artistic, sporting, and advertising fields when parents or guardians and the local labor inspector give their permission. Persons between ages 16 and 18 may work only if they have completed middle school, if the proposed employment constitutes vocational training, and if the work is not harmful to their health. The government effectively enforced these laws in the formal sector, but the NLI was not empowered to inspect private farms or homes. During the first half of the year, the inspectorate conducted 548 inspections	Country	Low risk for forced labour

	<p>involving 2,115 underage employees (ages 16 to 18). Authorities levied fines totaling 92,600 zloty (\$23,400) in 80 cases.</p> <p>The NLI reported that many employers underpaid minors or delayed their pay. The majority of employees found to be underage worked in commercial enterprises and repairs shops, processing industries, restaurants, and construction. Some children under age 18 also engaged in hazardous work in agriculture, primarily on family farms. Migrant Romani children from Romania were subjected to forced begging. Commercial sexual exploitation of children also occurred (see section 6)." (p. 27)</p> <p>d. Discrimination with Respect to Employment and Occupation</p> <p>The law prohibits discrimination with respect to employment or occupation in any way, directly or indirectly, on the grounds of race, sex, religion, political opinion, national origin, ethnic origin, disability, sexual orientation, age, trade union membership, and regardless of whether the person is hired for definite or indefinite contracts, or for full or half time work.</p> <p>The law does not specifically prohibit such discrimination based on language, HIV-positive status, gender identity, or social status. The government did not effectively enforce these law and regulations.</p> <p>According to the Polish Society for Antidiscrimination Law, by law the accused must prove that discrimination did not take place, but judges often placed the burden on the victim to prove that discrimination occurred.</p> <p>Discrimination in employment and occupation occurred with respect to gender, age, minority status, disability, political opinion, sexual orientation and gender identity, and HIV-positive status.</p> <p>According to a European Commission report, the gender wage gap in 2013, the latest year for which data were available, was 6.4 percent. A report published in 2013 by the Supreme Audit Chamber on the remuneration of men and women in the public sector stated 80 percent of women earned less than men in the same or similar positions in ministries, central government offices, local government offices, and government-owned companies. The report primarily attributed the remuneration gap to differing job qualifications.</p> <p>Discrimination against Romani workers also occurred (see section 6)." (p. 27-28).</p>	Country	<p>Low risk for child labour</p> <p>Specified risk for discrimination in labour market</p>
Additional general sources	Additional specific sources		
From national CW RA FSC-CW-NRA-PL CONTROLLED WOOD NATIONAL RISK ASSESSMENT FOR POLAND - 2013	<p>2.3 There is no evidence of child labor or violation of ILO Fundamental Principles and Rights at work taking place in forest areas in the district concerned</p> <p><i>Evaluation of compliance with requirements of the indicator on the level of the whole Poland territory:</i></p>	country	Low risk for child labour and core labour rights

	<p>Poland has ratified ILO conventions. The law in Poland prohibits work of children. Worker's rights are well secured by the law. There is no evidence for abusing of children work or violation of primary rules and ILO conventions in noted, significant scale.</p> <p><i>Basic sources for evaluation of the indicator requirements:</i></p> <p>1. Act of 26 June 1974 The Labor Code (Dz. U. 1974, No 24, item 141 with later changes),</p> <p>2. Global child labor trends 2000 to 2004. ILO (International Labor Office): http://www.ilo.org/ippecinfo/product/viewProduct.do?productId=2299).</p> <p>Risk assessment: Low</p>		
<p>Conclusion on Indicator 2.2:</p> <ul style="list-style-type: none">• Not all social rights are covered by the relevant legislation and enforced in Poland; E.g. section 2(1) of the 1991 Act on Trade Unions, the right to form and join trade unions was not granted to those persons who had entered into an employment relationship on the basis of civil law contracts; section 183c, paragraph 3, of the Labour Code refers to work of equal value as work requiring comparable professional qualifications, responsibilities and effort, and case law of the Supreme Court concerning the comparability of positions that are “unique in the whole organisational structure of the employer, while ILO Core Convention nr. 100 does not limit the application of the principle of equal remuneration to the same enterprise and states that the possibility of bringing equal pay claims should not be excluded due to the fact that no comparator is available within the enterprise. The government did not effectively enforce applicable laws. Resources, inspections, and remediation efforts were less than fully adequate and the small fines imposed as punishment were an ineffective deterrent to employers. Administrative and judicial procedures were subject to lengthy delays and appeals.• Right to freedom of association and collective bargaining is not upheld; Poland is ranked in Category 4 of the ITUC Global Rights Index 2016 which stands for systematic violation of the right to freedom of association, collective bargaining and strike. Labor leaders continued to report that employers regularly discriminated against workers who attempted to organize or join unions, particularly in the private sector.• There is evidence confirming compulsory and/or forced labour in the country, but the forest sector is not mentioned as a risk sector and no instances of forced labour were found in the analysis.• There is evidence confirming discrimination in respect of employment and/or occupation, and/or gender: Poland ranks nr. 124 out of 145 countries with a score of 0.52 for the most specific and relevant indicator ‘wage equality for similar work’ in the Global Gender Gap Index 2015. Discrimination in employment and occupation occurred with respect to gender, age, minority status, disability, political opinion, sexual orientation and gender identity, and HIV-positive status. Romani leaders complained of widespread discrimination in employment; at the national level approximately 80 percent of Roma were unemployed. Very recently, Prime Minister Beata Szydło has abolished Poland’s Council for the Prevention of Racial Discrimination, Xenophobia and Related Intolerance.• There is no evidence confirming significant child labour.• The country is signatory to all 8 fundamental ILO Conventions which are all in force.• There is evidence that any groups (including women) do not feel adequately protected related to the rights mentioned above: see information on gender and minorities above;• Violations of labour rights are not limited to specific sectors: Examples of violations were found in relation to a wide variety of sectors.	country	Specified risk for right to freedom of association and collective bargaining and for discrimination of women and Roma people in the labour market.	

The following specified risk thresholds apply: (14) The applicable legislation for the area under assessment contradicts indicator requirement(s); AND (15) There is substantial evidence of widespread violation of key provisions of the ILO Fundamental Principles and Rights at work.			
Indicator 2.3. The rights of Indigenous and Traditional Peoples are upheld. Guidance: <ul style="list-style-type: none"> Are there Indigenous Peoples (IP), and/or Traditional Peoples (TP) present in the area under assessment? Are the regulations included in the ILO Convention 169 and is UNDRIP enforced in the area concerned? (refer to category 1) Is there evidence of violations of legal and customary rights of IP/TP? Are there any conflicts of substantial magnitude [footnote 6] pertaining to the rights of Indigenous and/or Traditional Peoples and/or local communities with traditional rights? Are there any recognized laws and/or regulations and/or processes in place to resolve conflicts of substantial magnitude pertaining to TP or IP rights and/or communities with traditional rights? What evidence can demonstrate the enforcement of the laws and regulations identified above? (refer to category 1) Is the conflict resolution broadly accepted by affected stakeholders as being fair and equitable? 			
general sources from FSC-PRO-60-002a V1-0 EN	information found and specific sources	scale of risk assessment	risk indication
ILO Core Conventions Database http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:1:0 - ILO Convention 169	http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COU_NTRY_ID:102809 Poland did not ratify ILO Convention 169 Therefore this source does not provide information on its implementation by Poland.	country	-
Survival International: http://www.survivalinternational.org/ Human Rights Watch: http://www.hrw.org/ Amnesty International http://amnesty.org The Indigenous World http://www.iwgia.org/regions United Nations Special Rapporteur on the rights of indigenous peoples http://www.ohchr.org/en/issues/ipeoples/srindigenouspeoples/pages/sripeoplesindex.aspx UN Human Rights Council Universal Periodic Review http://www.ohchr.org/EN/HRBodies/UPR/Pages/Documentation.aspx UN Human Rights Committee http://www.ohchr.org/EN/HRBodies/CCPR/Pages/CCPRIndex.aspx search for country	http://www.refworld.org/docid/4954ce0623.html “Poland is highly homogenous, and according to the 2002 national census, nearly 97 per cent of the population are Polish. Main minority groups: Germans 147,094 (0.4%), Kashub speakers 52,490 (0.1%), Belarusians 47,640 (0.1%), Ukrainians 27,172 (0.07%), Roma 12,731 (0.03%), Lemkos 5,850 (0.02%), Lithuanians 5,639 (0.01%), Russians 3,244, Slovaks 1,710, Jews 1,055, Tatars 447, Czechs 386, Armenians 262, and Karaites 43 [Note: all figures taken from the 2002 national census.]” Kashubs (or Kaszubs) live concentrated in north-central Poland, along the Baltic coast. They speak a regional language, and while Kashubs consider themselves to be of Polish nationality, some regard themselves as belonging to a separate ethnic group. The government does not recognize Kashub as an ethnicity. [...] The government previously considered Lemko Ruthenians (or Lemkos) as Ukrainians, but now recognizes them as a distinct nationality. In 1947	country	Low risk

Also check: UN Committee on the Elimination of All Forms of Racial Discrimination http://www.ohchr.org/EN/HRBodies/CERD/Pages/CERDIndex.aspx	communist authorities forcibly dispersed much of the group throughout Poland and Ukraine.		
Intercontinental Cry http://intercontinentalcry.org/	http://www.shsnepa.org/Folktales%20and%20Legends/History%20Tales/Who%20are%20the%20Gorals.htm		
Forest Peoples Programme: www.forestpeoples.org FPP's focus is on Africa, Asia/Pacific and South and Central America.	Who are the Gorals? The Gorals were and are mountain people, shepherds wearing sheepskins, felted wool, homespun linen and intricate shepherd's pins, sponky, that hark back to an ancient tradition.		
Society for Threatened Peoples: http://www.gfbv.de/index.php?change_lang=english	The High Carpathian ranges and mountain slopes have been home to the sturdy Gorals for six centuries or more. It's believed that the mountain people migrated through the Carpathian range, although no written records survive that ancient trek. Although the Goral lands encompass what is now three countries, political boundaries nonetheless, these are one people – the Gorali - and for them there are no borders.		
Regional human rights courts and commissions: - Inter-American Court of Human Rights http://www.corteidh.or.cr/index.php/en - Inter-American Commission on Human Rights http://www.oas.org/en/iachr/ http://www.oas.org/en/iachr/indigenous/ - African Commission on Human and Peoples' Rights - African Court on Human and Peoples' Rights - European Court of Human Rights	The Gorals have a dialect, customs, and traditions. They lived in log homes in high places. They bring to mind the mysterious Wallachians or Valachs and the Rusyns who migrated into Slovakia over the centuries - are they connected? All seem to have made the long journey over the centuries tending their flocks from where - Greece, even Albania? They traveled through Romania, Ukraine, old sub-Carpatho Rus into Slovakia and Poland and even into Northern Moravia, now the Czech Republic.		
Data provided by National Indigenous Peoples', Traditional Peoples organizations;	In Poland north of Moravia, they are known as the Horals, and in the corner where Slovakia joins Moravia and Poland as Gorals. Along the high slopes where rare flowers bloom, these tenacious people forged out a life tending their sheep and coaxing crops from the high mountain meadows.		
Data provided by Governmental institutions in charge of Indigenous Peoples affairs;	The majority of the gorals can be found in Northern Slovakia and Southern Poland in the High Carpathian region in former Spiš and Orava counties.		
Data provided by National NGOs; NGO documentation of cases of IP and TP conflicts (historic or ongoing);	No sources mention IP/TP presence in Poland, neither the sources that give overviews, such as The Indigenous World, nor could any report or website be found mentioning or claiming IP/TP presence or a discussion or debate about such a presence.		
National land bureau tenure records, maps, titles and registration (Google)			
Relevant census data			
- Evidence of participation in decision making; (See info on implementing ILO 169 and protests against new laws) - Evidence of IPs refusing to participate (e.g. on the basis of an unfair process, etc.); (See info on implementing ILO 169 and protests against new laws)			
National/regional records of claims on lands, negotiations in progress or concluded etc.			
Cases of IP and TP conflicts (historic or ongoing).) Data about land use conflicts, and disputes (historical / outstanding grievances and legal disputes)			

Social Responsibility Contracts (<i>Cahier des Charges</i>) established according to FPIC (Free Prior Informed Consent) principles where available			
Google the terms '[country]' and one of following terms 'indigenous peoples organizations', 'traditional peoples organizations', 'land registration office', 'land office', 'indigenous peoples', 'traditional peoples', '[name of IPs]', 'indigenous peoples+conflict', 'indigenous peoples+land rights'			
Additional general sources for 2.3	Additional specific sources	scale of risk assessment	risk indication
From national CW RA FSC-CW-NRA-PL CONTROLLED WOOD NATIONAL RISK ASSESSMENT FOR POLAND - 2013	<p>2.4 There are recognized and equitable processes in place to resolve conflicts of substantial magnitude pertaining to traditional rights including use rights, cultural interests or traditional cultural identity in the district concerned</p> <p><i>Evaluation of compliance with requirements of the indicator on the level of the whole Poland territory:</i></p> <p>The mechanisms of fair conflict solution are guaranteed by the law. There is no evidence for their transgression. According to international reports, violation of traditional rights in Poland is insignificant. Conflicts considering the possession rights are resolved in arbitrary courts.</p> <p><i>Basic sources for evaluation of the indicator requirements:</i></p> <p>The full description of referential law regulations is provided by The Ministry of Justice: http://www.ms.gov.pl/.</p> <p>Risk assessment: low</p> <p>There is no evidence of violation of the ILO Convention 169 on Indigenous and Tribal Peoples taking place in the forest areas in the district concerned</p> <p><i>Evaluation of compliance with requirements of the indicator on the level of the whole Poland territory:</i></p> <p>There is no evidence of violation of indigenous peoples' rights in Poland territory. There are no indigenous people in Poland.</p> <p><i>Basic sources for evaluation of the indicator requirements:</i></p> <ol style="list-style-type: none"> 1. United Nations Permanent Forum on Indigenous, Factsheet 'Who are indigenous peoples' October 2007; 2. United Nations Development Group, 'Guidelines on Indigenous Peoples' Issues' United Nations 2009, 3. United Nations Declaration on the Rights of Indigenous Peoples, 13 September 2007. <p>Risk assessment: Low</p>	country	low

	Risk assessment for category II: Low Argumentation: some opinions received during the public consultation pointed to the violation of the local communities' rights because of limitation of the access to the wood logged from the region of Białowieża, Browsk and Hajnówka Forest District's area. Nevertheless the opinions are not directly related to the scope of the assessment and the risk has been assessed for the whole Poland territory.		
Conclusion on Indicator 2.3: There are no indigenous peoples and no traditional peoples in Poland. Therefore the following 'low risk' thresholds apply: (16) There is no evidence leading to a conclusion of presence of indigenous and/or traditional peoples in the area under assessment; AND (21) Other available evidence do not challenge 'low risk' designation.		country	Low risk

Controlled wood category 3: Wood from forests in which high conservation values are threatened by management activities

Overview

Poland has an area of 312,679 km² and is located on the Central European Lowlands. Approximately 31% of the country's territory is covered in forests⁹. Based on FAO's definitions, the forest cover of Poland consists mostly of productive forests with plantation-like structure, combined with a small fraction of semi-natural forests. In fact, most forests in Poland often are a mix of both highly managed secondary forests or plantations, and natural ecosystems. There are no undisturbed primary forests remaining in the country. In the most high conservation valuable forests, such as Białowieża Puszcza (Białowieża Forest) or the East Carpathian Woodlands, the major natural features are: integrity of large continuous forest complexes, uneven age of stands, high biodiversity - including a diversity of predatory species and a concentration of threatened and rare species typical of primary forests¹.

Polish forests are very diverse due to the country's range of elevations (from the Baltic coast to the alpine zone of the Carpathian Mountains), the various geological bedrock materials on forest soils (especially materials left on the plains by the three main glaciations, and granite and calcareous materials found in the mountains), and diverse climates (sub-Atlantic in the Western part of the country, and continental in the Eastern section). Species composition of Polish forests is naturally shaped by the geographic range boundaries of several trees, which do not occur farther North or East of the country, including European beech (*Fagus sylvatica*), Sycamore maple (*Acer pseudoplatanus*), Silver fir (*Abies alba*), Large-leaved lime (*Tilia platyphyllos*), and European larch (*Larix decidua*)⁶. The most common type of productive forest in Poland is the mesotrophic pine forest of the *Vaccinio myrtilli- Pinetum*, *Leucobrio-Pinetum* and *Peucedano-Pinetum* type. This forest type is classified as Lowland Pine Forest⁶. The Lowland Pine Forests, with Scotch pine (*Pinus silvestris*) as a dominant productive tree species, cover 49,6%³ of the forested area. Several other but minor pine communities from Erico-Pinion alliance, with famous *Vario-Pinetum* in Tatra Mountains are protected in reserves and national parks.

Economic and social development in Poland has been strongly affected by historical disturbances (including the 18th century country partition). Poland has therefore been characterized by uneven periods of industrialization and urbanization, extensive traditional agriculture, and historically vast forests that survived in relatively large areas until the 18th Century. Second World War caused further significant negative disturbance to Poland's forests. The displacement of native people from the Bieszczady Region (East Polish Carpathian) caused an ongoing change from an agricultural landscape into a forested landscape. With the move to a free-market economy in 1989, pressure on forests decreased. Poland's accession to the EU in 2004, along with adapting the forestry and wildlife protection legislation to worldwide recognised management development and EU policy, contributed to an increase in activities related to biodiversity conservation and sustainable development. This has led to strengthening of nature conservation in Poland, which is now continued.

Semi-natural forests are the best-preserved, and are mainly protected within national parks, nature reserves, and areas excluded from management within productive forests. The national parks manage approximately 2% of Polish forests, and nature reserves cover over 1% of the forests³ (see description of nature protection system below).

Type Division of Polish forests at a national scale:³

- 49,6 % Lowland Pine Forests
- 22,4 % Lowland Mixed Broadleaf / Coniferous Forests

- 13,1 % Lowland Broadleaf Forests
- 13,5 % Highland Forests
- 1,4 % Mountain Coniferous Forests

Considering the natural habitats, forest management risk related to category 3 is diverse. The lower habitat type share, the higher the risk. Special attention should be granted to moist and wet habitats, such as riparian and alluvial forests. These forest types historically covered 17% of the territory; today, they only cover 3%.² During recent decades, the large scale decrease in ground water level caused by lower rainfall precipitation and melioration is creating more pressure on wet and bog habitats.

Poland has an extensive NATURA 2000 conservation network, which covers 20% of the country's land. Close to half of the established NATURA 2000 sites are found in forests, with only a small fraction covering wetlands. Habitats such as 91E0, 91F0 (alluvial and riparian forests) are protected by Natura 2000 sites⁴; however, many such habitats, often consisting of small patches of communities, are mixed and managed within productive forests under public and private ownership.

The regionalization of Polish forestry covers the whole country, and defines regions on the base of local natural and environmental traits, such as climate, bedrock, land relief (lowland, upland, mountain), geological history (boundaries of the last four glaciations) and natural ranges of the main productive forest tree species. This is important, especially for silviculture, as it defines stand species compositions, felling schemes, and management rules for seed materials. The eight main forest regions comprised in that regionalization are: I Baltic Sea; II Mazury and Podlasie; III Wielkopolska and Pomorze; IV Mazowsze and Podlasie; V Silesia; VI Małopolska; VII Sudety; and VIII Carpathian region (Kraina Karpacka)⁶.

Polish Forest Ownership Structure⁶⁷:

- **Public forests** 7 611 360 ha represent 80,8% of the total forested area, including 77 % managed by the National Holding of State Forests (NFH) (Państwowe Gospodarstwo Leśne Lasy Państwowe), 2% managed by the National Parks authorities, 0,9 % managed by municipalities, and 0.9% under the management of other public entities.
- **Private forests** 1 808 640 ha represent 19,2% of the total forested area, with mostly small-scale private ownership. Most of the private forests are located close to or between agricultural fields and farms, in which the area of land used for agriculture is on average 6.40 ha, while the private land under forest cover is on average 0.88 ha⁸ per owner. In the South, private forests cover lower altitude mountains bordering inhabited valleys. The community-owned forests (e.g. owned by villages or groups of villages) and other forms of private ownership cover 1.1% of Polish forests.

Most of the wood (>95%) available on the market comes from public forests.³ In 2015 36 742 000 m³ of wood have been harvested by state forests while only 1 406 000 m³ in private forests⁶⁷. Also, the harvest rate in private forests is 0.95 m³/ha/year vs. 4.63 m³/ha/year in state owned ones¹³

Forests and forest management in Poland are formally supervised by the Ministry of the Environment. Most of the state-owned forests are managed by the Państwowe Gospodarstwo Leśne Lasy Państwowe - National Holding of State Forests (further NFH), which is organized in a three-level structure:

(1) The Director General of the NFH, appointed and supervised by the Minister of the Environment. The Director General is supported by the General Direction of State Forests – a central office unit located in Warsaw.

- (2) 17 Regional Directorates, tasked with supervision and coordination of the forest districts, covering the whole country.
- (3) The managers of the 430 forest districts, responsible for implementing forest management based on ten-year forest management plans (FMP). These are further divided into forest sub-districts for field implementation of forest management.

Local county government (foreman called starosta powiatowy) is responsible for supervision of management in private forests. , He or she hires professional foresters to carry out the duties. In most cases however, the head of the county delegates this task to the head of the local NFH district.

Poland's system of Nature Conservation is complicated. It consists of 10 categories of nature conservation^{39,67} which may cover entire forest ecosystems or only a fraction of the forest habitat, e.g. bird nest protection zone: 50-500 m from nest for 11 predator bird species, 3 owl species, and a stork. Forms of protection listed below often overlap (e.g. nature reserves may include natural monuments within their boundaries; NATURA 2000 sites may cover the areas already protected within the boundaries of national parks, nature reserves, and others). In 2016, the amount of protected areas and species within the country was:

- 23 National Parks (Park narodowy) - 195 200 ha of forests
- 1488 Nature Reserves (Rezerwat przyrody) - 95 600 ha of forests
- 122 Landscape Parks (Park krajobrazowy) - 1 317 000 ha of forests
- 396 Landscape Protection Zones (Obszar chronionego krajobrazu)
- 994 Natura 2000 sites (145 Special Protection Areas designated under the EU Birds Directive and 849 Special Areas for Conservation, designated under the EU Habitats Directive) - 3 876 000 ha of forests managed by NFH
- 36417 Natural Monuments (Pomnik przyrody) - 10 328 natural monuments located in forests
- 165 Documentation sites (Stanowisko dokumentacyjne)
- 7539 Ecological sites (Użytek ekologiczny)
- 335 sites of importance for nature and landscape (Zespół przyrodniczo-krajobrazowy)
- 715 species of protected plants
- 799 species of protected animals
- 322 species of protected fungi⁹

Only the national parks and the landscape parks are managed by separately established administrations (the National Parks Service for National Parks and the Landscape Parks Service for Landscape Parks). Nature reserves, Natura 2000, and protected species are supervised by *Regional Directorates for Environmental Protection*, supervised by the Ministry of the Environment. All the other forms of nature conservation are supervised by the head of the local government (council of the municipality) where the protected site is located (and the ongoing management actions are carried out by land/forest managers – usually within NFH).

Poland ratified the Convention on Biological Diversity (CBD) in 1995, and the convention was incorporated in 1996 into the Polish legislation. Implementation of all CBD goals, monitoring, and reporting to the Secretariat of the Convention, are the responsibility of the Ministry of the Environment. The CBD Strategic

Plan for Biodiversity 2011-2020 is used as a guideline for implementation. 32,5% of Poland is under environmental protection, which includes around 20% covered by Natura 2000 sites. Thus, the protected area of Poland exceeds the CBD Aichi Target 11 goal of 17%⁵⁴

Aside from its CBD commitments, Poland is also implementing many other international and European agreements influencing the biodiversity of forests, inter alia, EU Birds Directive, EU Habitats Directive (and resulting from them, the NATURA 2000 network), RAMSAR Convention, Convention for the Conservation of Migratory Species of Wild Animals (CMS) and CITES Convention. The Polish forests do not contain any tree/wood species listed in the annexes of CITES; however, several forest plant and animal species covered by the CITES convention are taken into consideration during assessments of the impact of forest management activities on biodiversity.

Aside from the nature conservation system that results from the Nature Conservation Act (2004), the Forestry Act (1992) sets forth rules for forest protection and requires all forest owners and managers to conduct sustainable forest management activities. According to forest rules forests, in general, cannot be transformed to other types of land use, the continuity of forest cover (logged forests must be regenerated within 5 years of the logging); multifunctional uses of forests (economic function, i.e. wood production to be treated at the same level of importance as social and natural functions; clear-cut size restricted: the maximum area of felling cannot exceed 4 hectares (ha), and usually limited to pine and alder monocultures¹². Within the framework of the Forestry Act, so called 'protective forests' (Pol. lasy ochronne) are established separately from the protected areas, which are designated under the Nature Conservation Act. The "protective forests" [lasz ochronne] are forests that provide natural ecosystem services, such as protection of soils, water resources, air quality, microclimate, landscape, etc. The "protective forests" must be managed in a way that guarantees ongoing meeting of their targets (i.e. soil protective forest must assure continuous protection of the soil against erosion). In practice, this is achieved by avoiding silvicultural practices which may breach natural balance of the forest ecosystems: draining of wetlands, clear-cut felling of stands, etc. In 2014, approximately 41.5% of the state-owned forests were designated as "protective forests". The percentage of "protective forests" in forests owned by municipalities and the private sector was much lower: 26% and 3.7%, respectively³. Approval of forests as "protective forest" is made according to Ministerial Order (Rozporządzenie Ministra Ochrony Środowiska, Zasobów Naturalnych i Leśnictwa z dnia 25 sierpnia 1992 r. w sprawie szczegółowych zasad i trybu uznawania lasów za ochronne oraz szczegółowych zasad prowadzenia w nich gospodarki leśnej) during FMP approval proces. All interested parties may submit an application for „protective forest”.

Forest Certification

All forest areas outside nature reserves and national parks are subject to silvicultural activities under the Forestry Act (1992), and are potential sources of commercial wood. Out of Poland's approximate 9.6 million hectares of forest cover that meet requirement of Forestry Act definition, over 6.9 million hectares are FSC certified (72% of Poland's forests). FSC Forest Management Certificates are held by 16 out of 17 regional state forest directorates (RDSF) and by 2 experimental units managed by the forestry departments of universities. The only state forest directorate still uncertified by FSC is the Krosno RDSF, which manages forests in the Polish Carpathian Region, where a high concentration of conservation values occurs. The second area excluded from FSC certification is Puszcza Białowieńska (the Białowieża Forest) in the Białystok RSDF¹¹. In 2014, the Białowieża Forest became the only Polish Natural World Heritage Site, owing to its outstanding biodiversity, naturalness and continuous forest cover, maintained since the last glaciation. Due to this nomination, it became the source of field conflict concerning forest management between NGOs, scientists and the Holding of National Forests, which manages the forest¹⁰. The private FMUs are not certified under a sustainable forest management certification scheme³.

Material Source Identification				
	Material Source Characteristics			
Area under Assessment	Legal Land Classification	Ownership	Management regime	Description of Material Source Type
The whole country	Permanent forest	Public – State owned	State – National Holding of State Forests	State owned, permanent, productive secondary forests with partial semi-natural structure. Regular source of timber.
			State – other managing entities (e.g. Ministry of Defense)	Not applicable – not a source of commercial wood
		Public – owned by local communities and provincial governments	communal and provincial	Privately/publicly owned, permanent, semi-natural, production forest
		Private (individual, farmer)	private – individual owners	
	Protected areas – national parks and nature reserves	Public - State owned	State – National Parks administration and regional directorates for environmental protection	State owned, permanent, semi-natural, limited source of timber
		Public – owned by provincial governments	Communal and provincial, under supervision of the National Parks administration or the corresponding regional directorate for environmental protection	Privately/publicly owned, permanent, semi-natural, limited source of timber
		Private – individual and community owned	Private – individual owners or communities under supervision of the National Parks administration or the corresponding regional directorate for environmental protection	
	Protected areas – other than above	Public – state owned	State – National Holding of State Forests	State owned, permanent, productive secondary forests with partial semi-natural structure. Regular source of timber.
		Public – owned by provincial governments	communal and provincial	

		Private – individual and community owned	private – individual owners or communities	Privately owned, permanent, productive secondary forests with partial semi-natural structure. Regular source of timber.
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Experts consulted

	Name	Organization	Area of expertise (category/sub-category)
1.	mgr inż. Wiesław Klimiuk	Białowieża Nationalpark	Kierownik zesp. Ds. ochr. Przyr. (Head of Wildlife Protection Division) – All HCVs in Białowieża Puszcza
2.	dr hab. inż. Jan Bodziarczyk	Biodiversity Institute at Forestry Division of Agriculture Academy in Kraków	Natura 2000 habitat specialist. Phytosociology of Mountain habitats. Nature Protection in Carpathian Mountains. All HCVs in Carpathian Region
3.	Mgr Teresa Ciesielka	Pieniński Nationalpark	Biologist – protected and endangered species in Beskid Sądecki and Pieniny Region Consulted for HCV.1, 3, 6 in the West Carpathian region with emphasis on private forests
4.	dr hab. inż. Jerzy Lesiński	Biodiversity Institute at Forestry Division of Agriculture Academy in Kraków	Phytosociology, Ecology, Natural succession, Forest function – Consulted for HCV.1, 2, 3 in Poland, including Białowieża Puszcza
5.	Wojciech Wdowik	Regional Environmental Protection Office in Rzeszów	High Conservation Values Location and cooperation with forest owners Consulted for HCV.1, 2, 3, 4 in Carpathian Region (RDLP Krosno)
6.	Agnieszka Pastuszczyk	Regional Environmental Protection Office in Rzeszów	Environmental Impact Assessment at Krosno – Rzeszów region (Carpathian) Consulted for HCV 1, 2, 3, 4 in Carpathian Region (RDLP Krosno)
7.	prof. dr hab. Henryk Okarma	Instytut Ochrony Przyrody PAN (Nature Protection Insitut of Polish Science Academy)	Consultation on <i>Ursus arctos</i> and <i>Lynx lynx</i> population threats in HCV.1 in Carpathian Region
8.	Jan Gancarski -	Podkarpackie Towarzystwo Historyczne (Podkarpackie Historical Society)	Overview and protection of cultural values HCV 6 in Carpathian Region
9.	prof. dr hab. Jerzy Gutowski	Department of Forests of the Forest Research Institute. Zakład Lasów Naturalnych Instytutu Badawczego Leśnictwa, ul. Park Dyrekcyjny 6, 17-230 Białowieża	Consultation on fauna of xylobiontic beetles and their ecology HCV 1 in Białowieża Puszcza
10.	prof. dr hab. Tomasz Wesołowski	Laboratory of Forest Biology, Wrocław University. Pracownia Biologii Lasu Uniwersytetu Wrocławskiego, ul. Sienkiewicza 21, 50-335 Wrocław	Consultation on ecology of woodpeckers and forest owls in HCV cat.1 in Białowieża Puszcza

11.	dr hab. Bogdan Jaroszewicz	BIAŁOWIESKA STACJA GEOBOTANICZNA Uniwersytetu Warszawskiego (Warsaw University Geobotanical Research Station)	Forest Ecology and Forest Biology at Białowieska Woodland HCV 1, 2, 3, 4, 6 in Białowieska Puszcza
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Stakeholders consulted

	Name	Organization	Area of expertise (category/sub-category)
1.	Marek Smolarkiewicz	Polski Klub Ekologiczny w Poznaniu Fundacja Na Straży Przyrody Polish Ecological Club - Wildlife Guard Fundation	Wielkopolska Region habitat and nature protection activist of NGOs
2.	Dariusz Gatkowski	WWF Poland	National level biodiversity specialist
3.	Zbigniew Żurek	Małopolskie Biuro OTOP (National Bird Protection Society)	Bird protection specialist. Coordinator of Caterpillar Protection Program in West Carpathian Mountains.
4.	Adam Bohdan	Fundacja Dzika Polska	The head of NGOs active in Białowieska Puszcza entomology. Recognition and potential threats to HCVFs in Białowieska Puszcza
5.	Paweł Średziński	Fundacja Greenpeace Polska	Białowieska Puszcza
6.	Radosław Michalski	Fundacja Dziedzictwo Przyrodnicze (Wildlife Heritage Fundation)	Nature Protection in Carpathian Mountains (Beskid Niski and Bieszczady)
7.	Damian Zieliński	Generalna Dyrekcja Lasów Państwowych General Directorate of State Forests	Third party evaluation internal support
8.	Jacek Stankiewicz	Regionalna Dyrekcja Lasów Państwowych w Krośnie General Directorate of State Forests in Krosno	Ecosystems and Silviculture management
9.	Paweł Panaś	Nadleśnictwo Rymanów Rymanów Forest Division	Head of Rymanów Forest Division
10.	Jan Kułak	Nadleśnictwo Rymanów Rymanów Forest Division	Silviculture, field visit assistance
11.	Zbigniew Kopczak	Nadleśnictwo Bircza Bircza Forest Division	Head of Bircza Forest Division
12.	Stanisław Rębisz	Nadleśnictwo Bircza Bircza Forest Division	Forestry operations
13.	Adrian Grzegorz	Natural Forest Foundation	North Poland Forests
14.	Krzysztof Oniszczyk	Regionalna Dyrekcja Lasów Państwowych w Białymstoku	Ecosystem Protection Officer
15.	Adam Pawłowski	Regionalna Dyrekcja Lasów Państwowych w Białymstoku	Nature Conservation, Tourism and Certification Specialist
16.	Marek Jadeszko	Nadleśnictwo Hajnówka Hajnówka FMU	Forester at Hajnówka Forest District

17.	Izabela Janiel	Nadleśnictwo Hajnówka Hajnówka FMU	Local FMU staff. Operation supervisor.
18.	Robert Sawicki	Nadleśnictwo Hajnówka Hajnówka FMU	Local FMU staff

Risk assessment

Indicator	Sources of Information	HCV occurrence and threat assessment	Functional scale	Risk designation and determination
3.0	1, 4, 12, 23-33, 36, 39, 56-60	<p>The identification of HCV areas in Poland is generally based on the HCVF Guidelines developed by the Poland Working Group of the Forest Stewardship Council on July 8th 2006²⁴. Until 2015, the FSC Poland Working Group was a nationally authorized body accredited by the international FSC organization. It provided National Risk Assessments (FSC Controlled Wood Risk Assessment - Interpretation of Annex 2b of the Standard for Company Evaluation of FSC Controlled Wood for Poland) and binding regional interpretation of FSC's international Principles and Criteria. The criteria for identification of HCVs have been customized to reflect the legal and natural conditions of the Polish forests.</p> <p>For this CNRA, following FSC instructions, HCV classification has been aligned with the current FSC classification, based on the National Risk Assessment Framework FSC-PRO-60-002a v.1.0⁵⁹ and Common Guidance for identification of High Conservation Values⁶⁰. Sources additional to the HCVF Guidelines have been used to identify HCVs.</p> <p>The knowledge about distribution and concentration of biodiversity and cultural values for all HCV categories evaluated in this risk assessment in Poland is based on:</p> <ul style="list-style-type: none"> • Data available from regional directories and institutions of the National Forest Holding and related bodies, including variety of reports, maps and databases developed by BULiGL, Wydział Urządzania Lasu DGLP, local state forest directories, institutions (especially IBL), FSC certified regional directorates, forest districts; Data, maps, inventories, monitoring results developed by GIOŚ (General Directory of Environmental Inspection) • Academic support (key experts consulted); • Evaluations conducted for NATURA 2000, • Information from regional directorates of the environmental office and from the Regional Conservator of Cultural Heritage; 	Poland	<p>“Low risk”</p> <p>Threshold (1) and (2) has been met:</p> <p>Data available are sufficient for determining HCV presence within the area under assessment;</p> <p>AND</p> <p>Data available are sufficient for assessing threats to HCVs caused by forest management activities.</p>

		<ul style="list-style-type: none"> • Publications from local initiatives and NGOs (e.g. KOO – Eagle Protection Commission, WWF, Nature Heritage Foundation (Fundacja Dziedzictwo Przyrodnicze); • FSC Forest Management public summary reports <p>HCVs are mapped by FMUs locally or regionally, rather than at the national scale. Maps of such values were prepared for all FMUs managed by NFH – and they are publicly available on the website of each Regional Directorate of State Forests, e.g.: http://www.szklarska.wroclaw.lasy.gov.pl/c/document_library/get_file?uuid=e9895157-24ab-49c2-adfb-a6a61b3fc6a1&groupId=21700557 or in public information bulletins, e.g.: http://bip.lasy.gov.pl/pl/bip/dg/rdlp_wroclaw/nadl_glogow/plan_urzadzania_lasu/czesc_opisowa.</p> <p><u>Site specific mapping</u> HCV 1, 2, 3, 4 and 6 data by name and FSC classification are now often included in the forest management plans of FSC-certified FMUs (HCV5 is not present in Poland). Silviculture methods, species composition, value recognition described in the forest management plans are based on on-site research/inventory, soil and habitat maps, which guarantee good knowledge of the distribution of habitats¹², including HCV habitats. Knowledge of the status of species and habitats is also high in those types of protected areas which require the preparation of management plans or plans for conservation tasks: national parks, nature reserves and NATURA 2000 sites³⁹. Additionally, distribution of several flagship species (e.g. wolf, lynx, European bison, hermit beetle, marsh fritillary, etc.) was mapped and evaluated at the national scale. The knowledge of the status of species and habitats listed in the Annexes to EU Bird Directive⁵⁸ and Habitat Directive⁵⁷ is good and up-to-date, due to the requirement of monitoring and reporting on their status every 3 to 6 years.</p> <p>In the case of cultural heritage sites, these are mapped and recorded at the regional level (the record is kept by the Regional Conservator of Cultural Heritage)²³. Officially recorded cultural and archaeological sites are listed in forest management plans, and taken into consideration during forest felling or other silvicultural activities. In all cases, at least a general assessment of the influence of forest management on the cultural/archaeological site is carried out before implementing any activity that may potentially represent a threat to the site.</p> <p>In the land registry system, field ownership data system, and wildlife monitoring, are available. The data are accessible from organizations or institutions that support the system only. The list of national scale, publicly accessible databases and maps of species and habitats, including RTE includes among others:</p> <ul style="list-style-type: none"> • Natura2000 areas: <ul style="list-style-type: none"> ○ http://natura2000.gdos.gov.pl/datafiles , 		
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		<ul style="list-style-type: none"> ○ http://obszary.natura2000.org.pl/index.php?s=lista • The map of protected areas and natural monuments: http://geoserwis.gdos.gov.pl/mapy/ • The metadata for the map of protected areas and monuments: http://www.gdos.gov.pl/dane-i-metadane • Prioritized lists of habitats and plant and animal species can be obtained from the General Inspector's Office for Environmental Protection (Habitat and Bird Directive listed species): http://www.gios.gov.pl/siedliska/default.asp?nazwa=ranking&je=pl • Distribution of mammals: http://www.iop.krakow.pl/ssaki/Katalog.aspx • Distribution of breeding birds: http://www.ornitho.pl/index.php?m_id=505 • Distribution of plants: http://www.atlas-roslin.pl • The road-map for the protection of chosen species and habitats: http://www.bestpractice-life.pl/g2/oryginal/2015_01/b160f4b82309eb84aae51b2de4f26a41.pdf. • Additionally, in the webpage of each certified FMU, one may find a map of the HCV Forests. <p>The material cultural heritage distribution may be reviewed in the portal of the Polish National Heritage Board, which includes 83,398 sites of cultural and archeological heritage:</p> <ul style="list-style-type: none"> • http://mapy.zabytek.gov.pl/nid/ <p>Detailed registers of the officially recognized cultural heritage of all material types are available in the webpages of each of the 17 regional heritage conservators, e.g.:</p> <ul style="list-style-type: none"> • http://wuozbialystok.bip.gov.pl/rejestr/ for Podlasie • http://www.mwkz.pl/rejestr-i-ewidencja-zabytkow for Mazowsze • http://www.wuoz.malopolska.pl/index.php/rejestr-zabytkow for Małopolska, etc. <p>The HCV areas in the risk assessment for Poland are based on FSC certified FMU's HCV recognition for certified forests, and via proxies or direct information for non-FSC certified forests. See applicable HCV for more detail of sources used. Also see list of sources.</p> <p>Threats & Safeguards identification and evaluation</p>		
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3.1 HCV 1	1-13, 15-18, 24-32, 34, 35, 37-43, 45, 48-55,	<p>Occurrence</p> <p>1/2-2/3 of the estimated 63,000 species present in Poland are considered forest-dependent or are at least associated with forests³.</p>	Białowieża Forest (Browsk, Hajnówka,	'Specified risk' Threshold (8) is met: HCV 1 is
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	56, 57, 61, 65, 70, 71, 72.	<p>The area under assessment contains temporal, seasonal, and ephemeral habitats/resources, such as roosting, breeding, hibernation, shelter, and migration sites for RTE species.</p> <p>32,5% of Poland is under environmental protection, which includes around 20% covered by Natura 2000 sites. Thus, the protected area of Poland exceeds the CBD Aichi Target 11 goal of 17%⁵⁴. Approximately 33% of all forests in the country is covered by NATURA 2000 network, which is around 3,1 mio. ha of all forests</p> <p>Around 38 % of NFH forests is included in Natura 2000 sites. This includes:</p> <ul style="list-style-type: none"> - Birds Directives 2 217 000 ha - Habitats Directives 1 659 000 ha <p>Natura 2000 sites, which overlaps with the area corresponding to national forms of nature protection, thus increasing their conservation efficiency³</p> <p>The forests within nature reserves established for conservation of fauna, flora, or fungi, and within national parks, can be automatically treated as proxies for the areas with high concentrations of RTE species. They were established with the aim of protecting a specific taxonomic group of RTE organisms (nature reserves) or to protect “all elements of nature” in the best-preserved locations (national parks)³⁹.</p> <p>Due to the lack of natural geographical barriers, and the continuity of habitats in a latitudinal layout, endemic species occur in very few places. The most important areas of endemism in the country are the alpine ecosystems, above the upper forest line, and most of them are protected within national parks (Karkonosze, Tatry, Pieniny). There are only a few endemic species known to occur in the Polish lowlands, but they occur in non-forest ecosystems^{25,26}.</p> <p>The red lists of RTE species (IUCN, national, regional) from all taxonomic groups (plants, fungi and animals) should be considered during HCV 1 identification/delineation. Threats are recorded for 1,648 plant species in Poland, and it is estimated that 124 plant species have gone extinct or declined over the last 200 years^{24,25,26}. So far, 2,769 animal species have been ranked on the red lists as endangered, including 2,618 species of invertebrates, and 151 vertebrates (mainly birds). Due to anthropogenic pressure, 16 vertebrate species have disappeared or gone extinct in Polish territory^{27,28,29}. However, certain species, such as the ant species (<i>Formica polyctena</i>, <i>Formica pratensis</i> and <i>Formica rufa</i>), which are listed as endangered in most Western European countries, are ranked in a lower threat category in Poland. This also pertains to certain butterfly species (<i>Euphydryas maturna</i> and <i>Eriogaster catax</i>) that are recognized worldwide as critically endangered. Similarly, among vertebrates, there are species in Poland that are in better condition than in other areas of their range. An example of this is the otter (<i>Lutra lutra</i>) which is regarded as endangered in all of Europe but has reinvaded all the Polish territory⁵⁴. Thus, several species that are rare or threatened at the European scale are still common in some parts of Poland, and they do not show signs of decline within the country. In such cases, they are not considered for the establishment of HCV 1 areas,</p>	<p>Białowieża FMUs)</p> <p>forest districts Bircza, Ustrzyki Dolne, Lesko, Komańcza, Baligród, Cisna, Lutowska, Stuposian y of Krosno Regional Directorate of State Forests</p> <p>Rest of Poland</p>	<p>identified and/or its occurrence is likely in the area under assessment and it is threatened by management activities: Białowieża Forest (Browsk, Hajnówka, Białowieża FMUs) and</p> <p>Forest districts Bircza, Ustrzyki Dolne, Lesko, Komańcza, Baligród, Cisna, Lutowska, Stuposiany of Krosno Regional Directorate of State Forests</p> <p>‘Low risk’</p> <p>Threshold (6) There is low/negligible threat to HCV 1 caused by</p>
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	<p>unless they naturally overlap with areas where other RTE species are found. The delineation of HCV 1 should refer to the ecological needs of the entire life-cycle of the species: it should cover all habitats/habitat patches essential for closing the life cycle and allowing survival of the species in different seasons²⁴.</p> <p>It must be considered that, in Poland, all red lists (25-29) have only informative value. They are not a source for the legal status of any species i.e. listing of species on a red list does not require any person or institution to protect it (its legal status is the same as that of any other species), unless it is also named on the list of protected species issued by the Ministry of the Environment. Only species listed in the ordinances of the Ministry of the Environment for the protection of species of animals³⁰, plants³² and fungi³¹, and lists published as Annexes to the EU Habitat⁵⁷ and the EU Bird Directives⁵⁸, enjoy a legal base for their protection. The Natura 2000 sites established for conservation of the species of interest to the community^b are automatically classified as a proxy for this category of HCV1; however, not all protected areas should be recognized as HCV 1, because they may have been established for goals other than protection of RTE species or habitats (e.g. protection of landscape, or protection of important forests for ecosystem services, as defined in HCV 4 and HCV 6). However, A Natura 2000 area is a specific form of nature conservation in which not the entire area is protected, but rather specific natural habitats, habitats of specific species, and species themselves in the places where they concentrate. Therefore, they are often important for HCV 1, but only in those fragments of the area within the boundaries of the Natura 2000 sites where there are high concentrations of specific species and/or natural habitats.</p> <p>The refuges for threatened and endangered species, recognized by experts (documented and described in the literature, reports, and other expert documents)^{25, 26, 27, 28, 29}, are in most cases protected within the national parks and nature reserves, where nature conservation has priority over commercial wood production. There are only a few exceptions, where refuges of RTE species of well documented importance at the continental or global scale are present in locations not covered by FSC certification, nor entirely covered by the boundaries of nature reserves or national parks. This applies to the Białowieża Forest in the Białystok Regional Directorate of State Forests, and the area of the proposed Turnicki National Park in the Krosno RDSF, which are crucial for the existence of several species listed on the European, national or regional Red Lists (list of threatened and endangered species)^{1,41-45}, or Annex II or IV of the Habitat Directive⁵⁹ or Annex I of the Birds' Directive⁵⁸. As Białowieża Forest and the Krosno RDSF are both considered important biodiversity hotspots^{1,10,35,41,43,45}, special attention has been granted to these.</p> <p>The Białowieża Forest is a UNESCO-recognised Transboundary (Poland/Belarus) World Heritage Site "Białowieża Forest" (WHS). It was established because it meets Outstanding Universal Value criterion 10th</p>	managed activities in the area under assessment: Rest of Poland
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^b Site of Community importance means a site which, in the biogeographical region or regions to which it belongs, contributes significantly to the maintenance or restoration at a favourable conservation status of a natural habitat type in Annex I or of a species in Annex II and may also contribute significantly to the coherence of Natura 2000 referred to in Article 3, and/or contributes significantly to the maintenance of biological diversity within the biogeographic region or regions concerned. For animal species ranging over wide areas, sites of Community importance shall correspond to the places within the natural range of such species which present the physical or biological factors essential to their life and reproduction.
http://glossary.eea.europa.eu/EEAGlossary/S/site_of_Community_importance

		<p>for site selection: “to contain the most important and significant natural habitats for in-situ conservation of biological diversity, including those containing threatened species of outstanding universal value from the point of view of science or conservation”⁴¹, which entirely overlaps with the HCV 1 definition provided by the classification listed on the chapter describing data availability. The Polish part of the WHS Białowieża Forest covers the area managed by the national park (16% of the forest) and three forest districts of the RDSF Białystok - Białystok, Hajnówka, Białowieża (84% of the forest, including approximately 18% covered by nature reserves). Most of the Białystok RDSF is certified, but the Białowieża Forest has been excluded by the Białystok RDSF from the FSC certification process¹¹. PEFC certificate no. PL PEFC-140187 is however successfully maintained. The forest is widely recognized as the best-preserved fragment of European lowland temperate forest, with primeval features such as species refuges, natural regeneration, wood debris, natural open spaces, stand structure debris that are part of the forest ecosystem and host irreplaceable habitats for RTE species^{41,53}. The area contains many forest-dwelling RTE species, <i>inter alia</i>, the largest population of free roaming European bison (<i>Bison bonasus</i>), several bird species for which the forest is an important habitat at the continental scale (e.g. white-back woodpecker, pygmy owl, hazel hen)^{1,44} and large amounts of rare insect species (some of them known only in a few places in Europe, e.g.: <i>Aulanothruscus laticollis</i>, <i>Pytho kolvensis</i>)⁴¹.</p> <p>The Białowieża Forest is also a hotspot of fungus biodiversity – 50% of Polish macro-fungi and 25% of the European macro-fungi were recorded within its boundaries^{53,55}. The area is also important for xylobiontic beetles: <i>Pytho kolvensis</i>, <i>Phryganophilus ruficollis</i>, <i>Boros Schneideri</i>, <i>Cucujus cinnaberinus</i> (species listed in the annex to the EU Habitat Directive), and <i>Cucujus haematodes</i> (Polish Red List of Xylobiontic Beetles).⁵³ The Białowieża Forest has a long tradition of forest protection, dating to the beginning of the 15th century, when it was included into the properties of the Polish Royal House. Since the early 1990s, NGOs and the scientific community have increased pressure on FMU managers and the government to limit silvicultural use of the Białowieża Forest for economic purposes and boost its conservation.</p> <p>Carpathian Mountains and Krosno RDSF.</p> <p>Kosno RDSF is located in a larger bio-geographical area – the Carpathian Region. On the South, it covers the eastern part of the Polish Carpathian Mountains - Bieszczady. At the North, it contains lowland forests, and a mosaic of upland forests at the west. Krosno is the only non FSC-certified regional directorate in Poland, however, the PEFC certificate is successfully implemented.</p> <p>The Carpathian Region (Kraina Karpacka), located in the south-eastern part of Poland, is a region where the concentration of geological, morphological and biological diversity is significant. The Carpathian forests have a concentration of special natural values, such as populations of protected species, endemism, rare habitats, local cultural and historical sites, landscapes^{42,45}. The land is listed as one of the key ecoregions in Global 200 (PA0504 - Carpathian montane forests)^{5,7}.</p> <p>The region is at the same time characterised by the presence of a strong system of nature protection. The area has the highest concentration of national parks (6), landscape parks, and reserves in the country.</p>		
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		<p>This, together with sustainable forest management, should ensure the continued presence of High Conservation Values at the general level in the area. The legal system and tools used by the national forestry authorities are under constant development, and have improved the quality of nature protection over the last 20 years. Another important fact is a systematic increase of forest cover and biological diversity during the period spanning between 1945 and today, especially in the Bieszczady Mountain region.^{67, 68, 69}</p> <p>The area managed by Krosno RDSF contains a high concentration of protected, rare, endangered, and red listed species of animals, plants and fungi, inter alia, vertebrates only found in Poland in this region: wild cat (<i>Felis silvestris</i>) and aesculapian snake (<i>Zamenis longissimus</i>)^{2,4,18,28,29,37,45} (see appendix B2, B3, B4, B12). RTE species are represented for all animal taxonomic groups. The most precious natural areas are protected in the Bieszczadzki National Park and numerous nature reserves. But large areas of forests valuable for wildlife are still outside national parks - under sustainable forest management. Biodiversity has bloomed after human settlements, which existed up to the Second World War, were destroyed. The areas of the Bieszczady Mountains, previously densely populated and used by farmers and shepherds, were both naturally recolonized by forest, and artificially reforested. That process, along with the economic underdevelopment of the region, led to a biological diversity boost, and the creation of strong refuges for large carnivores, birds, reptiles, insects, fungi and plants.^{42,45}</p> <p>Threats & Safeguards identification and evaluation</p> <p>Due to differences in HCV 1 threat level, the risk assessment is grouped based on scale of official protection of the places recognized for sheltering a concentration of RTE species, including: national parks and nature reserves, other protected areas, and private forests. In addition to the general presentation, there is a detailed description of the Białowieża Forest and Krosno Regional Directorate of State Forest.</p> <p>FSC certified state forests are excluded from the assessment.</p> <p><u>National parks and nature reserves</u></p> <p>The national parks and nature reserves potentially containing HCV 1 are clearly defined in the Nature Conservation Act (2004)³⁹ and their boundaries are precisely demarcated on maps and in the field. Any logging in these areas is carried only for nature conservation goals defined in management plans, as <i>inter alia</i> improving habitat of priority species, rehabilitation of natural habitats, eradication of alien species, improving habitat characteristics for priority RTE species, etc. All national parks are implementing or preparing management plans. For national parks that do not have management plans in force, an administration prepares annual plans with lists of conservation tasks, assessed and approved by the Ministry of the Environment. Most nature reserves have management plans in place, or these are currently being prepared. In those reserves, any intervention of the forest ecosystem needs to be approved by the Regional Director for Environmental Protection, who evaluates the impact of the proposed intervention on</p>		
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		<p>biodiversity³⁹. This approach assures that there is minimum risk of biodiversity loss in the nature reserves where management plans are not in place yet.</p> <p>Logging in national parks is very limited (approximately 180,000 m³ per annum, which in 2014 constituted about 0.4% of the total annual logging in Poland)^{3,9} and part of it is used for the national parks' own needs or for local, private consumption by the land owners.</p> <p><u>Other protected areas:</u> Landscape parks (Park krajobrazowy), landscape protection zones (Obszar chronionego krajobrazu), Natura 2000 sites, documentation sites (Stanowisko dokumentacyjne), ecological sites (Użytek ekologiczny), and sites of importance for nature and the landscape (Zespół przyrodniczo-krajobrazowy).</p> <p>Landscape park is a form of nature, historic, cultural and landscape value protection established by Nature Conservation Act (2004)³⁹. With a goal of conservation and promotion at sustainable development of the area.</p> <p>The forests containing high concentrations of biodiversity but covered by protected areas other than a national park or a nature reserve, are maintained for the conservation of natural, historical, cultural, and landscape values, under sustainable use of forests (the Forestry Act); therefore, they need a type of management balancing high conservation values and commercial uses of forests. Close to 51% of the landscape parks are forests. Natura 2000 sites cover 38% of the forested area. Similarly, other protected areas are also very often located in forest ecosystems³.</p> <p>Most of these protected areas do not require implementation of conservation plan as protection, restoration or maintenance are included in forest management plans. Rules of management are described in the Nature Conservation Act (2004)³⁹ but the priority is given to sustainable forest management regulated by the Forestry Act (1991)⁴⁰. The exceptions are landscape parks (park krajobrazowy regulated by Nature Conservation Act 2004) which must have specific value management plans, and Natura 2000 sites, for which plans are required to include conservation goals and tasks. All forms of management plans used in Polish protected areas are prepared and established by the state or local authorities, which are independent from forest management interests. The important recommendations from the management plans of protected areas (Natura 2000 management plan/PZO) are incorporated into the forest management plans of FMUs that are located within in the borders of protected sites. Implementation of management rules is supervised by the Regional Directorate for Environmental Protection) and additionally, they are voluntarily monitored by active "green" NGOs, which work effectively for the protection of RTE species and their habitats. Complaints from NGOs are also assessed during the certification of forest management.</p> <p>The Natura 2000 management plans of conservation tasks, a requirement for the implementation of Natura 2000 sites, set a good balance between the conservation goals of Natura 2000, and forest use, thus ensuring effective protection of HCV values as well. The plans are prepared by external companies (NGOs,</p>		
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		<p>private entities, entities specialized in the preparation of forest management plans), and after public consultations, they are approved by the Regional Director for Environmental Protection³⁹.</p> <p>The system of nature conservation, combined with sustainable forest management, ensures the continued presence of forest species and habitats defining HCV 1 at the general level in the country. The legal system and tools used for national forestry management are under continuous improvement.</p> <p>In private or non-certified forests being designated as main protected area, no commercial logging activities are allowed. Such activities like logging may arise from protection plans. Besides, currently private forests represent lower risk areas due to low harvest rate compared to state and public forests (see section on private forests below).</p> <p>The Areas of Importance for Birds (IBA)³⁸ do not have any special status in Poland. Regular sustainable forest management takes place on their territory, and potential risk to the status of HCV 1 can be identified (please see section on Białowieża forest). It should be stressed that, in Poland, only a few of the most common and game bird species are not protected by law (e.g. <i>Columba palumbus</i>, <i>Perdix perdix</i>, <i>Anas platyrhynchos</i>).</p> <p>There is low risk of damage to HCV 1 areas covered by national parks and nature reserves, areas protected from forest management activities due to clear regulations at the national and institutional level considering the relations between nature conservation and commercial logging. Legislation is well implemented (See category 1, 1.9).</p> <p><u>Rare, Threatened and Endangered Species outside protected areas</u></p> <p>Each of the three lists of legally protected species (animals, plants and fungi) includes a list of prohibitions and a list of exceptions from the prohibitions relating to protected species^{30,31,32}. They also include several species which need protection zones to be established around their breeding sites or the sites where they occur. Lists of all RTE species, including those listed on red lists^{25,26,27,28,29} but not on the ministerial ordinances, are included into the forest management plans (in the section “Plan for nature conservation”) and foresters continuously monitor and update the presence and distribution of red listed and protected species within the boundaries of their management units, which ensures a fair knowledge of recognised species existence. For species that require deeper knowledge to be recognised or monitored, relevant specialists are assigned based on contracts, programs or voluntary activity. (See appendix C3, C4, C21, C22, C23p.par.1p.5b and par.2.) . This is required for all certified forests, but it is also practiced by foresters of uncertified FMUs of NFH (PGLLP), LZD, NP and private forests supervised by NFH foresters. Secondly habitats and RTE species are by law required to be monitored by state organizations – WIOŚ and RDOŚ. In Poland, FMU sub-districts (leśnictwa) are small scale management units, approximately 1000-1500 ha on average, and they are usually managed by a team of two people, which ensures that they know their sub-district very well and can look after both forest management and biodiversity protection. The adequate</p>		
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		<p>regulations for preparation of forest management plans, and the procedures for their continuous updating, are described in the internal instruction of the NFH (Instructions for planning forest management activities - Instrukcja urządzania lasu). All silvicultural operations should be preceded by a field survey of such species, and by an assessment of the impact of the planned tasks on the protected species present in the area. The forest management plans, including the plans for nature conservation, their updating and assessment procedures, are assessed annually during the forest management certification process. In non-certified forests, the procedures are controlled by the internal forest inspection system, which monitors FMUs by request of the Regional or General Directorates of State Forests.</p> <p><u>Private Forests</u></p> <p>Private forest management is supervised directly by the county government (powiat), but in most cases, the head of the county commissions this task to the head of the local NFH district⁴⁰. At the national level, there is no clear risk diversification with respect to forest ownership, because the Forestry Act and other law requirements, such as the Nature Conservation Act and the species protection ordinance, cover forest management in forests of all types of ownership. In the past, private forests were considered more risk-prone than public forests due to overharvesting in the period 1990 – 2000, poor supervising, illegality of wood, and the poor protection of biodiversity. However, recent findings of wildlife activists, state foresters responsible for control over private forests, FM auditors, and stakeholder information, indicate there are many cases confirming better preservation and sustainable management in private forests, even if this may be unintentional, being rather the effect of low harvesting rates (0.95 m³/ha/year in private forests vs. 4.63 m³/ha/year in state owned ones)¹³.</p> <p>Stakeholder consultations conducted in July-September 2016, during the implementation of CNRA, and on-site verification of sample of private forests performed in the period 2010 – 2017 revealed no systematic, continued, wide area affected, damaged, or significant threat in private forests. Generally low level of biodiversity, simplified stand structure has also been confirmed. The country level significant spots for HCVs in private forests are well recognised and monitored. One example is large population of <i>Taxus baccata</i> in private forest located south of Poland that has been planned to be purchased by state forests (NFH) in order to make reservation process easier. Private forests are considered low risk.</p> <p>Białowieża Forest and Krosno RDSF</p> <p>In the Białowieża Forest and Krosno RDSF, significant and systematic conflicts between forest management and conservation of wildlife have been reported by stakeholders: foresters, NGOs and scientists. The dispute has lasted for more than a decade, and relates to protected, red listed, threatened and endangered species and habitats, as well as to area management in general^{42,43,50,51,52}. Since these areas are hotspots for biodiversity, and there is a high level of conflict, such areas are assessed in detail below.</p>		
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		<p><u>Białowieża Forest</u></p> <p>Many diverse forms of nature conservation are implemented in the Białowieża Forest. Conservation and protection zones often overlap with each other: national park (1), with an approximately 1 km-wide buffer zone around its borders, nature reserves (22) for a total area of 12 thousand ha, nature monuments (1204), protected fragments of ecosystems (użytki ekologiczne, 83). The whole Białowieża Forest is covered by Natura 2000 Special Protection Areas (SPA, 1) and Special Areas for Conservation (SAC, 1). Additionally, FMUs have established numerous areas representing ecosystems excluded from commercial harvesting (appendix C10, C11b) The area outside the national park is covered by the Protected Landscape Area (obszar chronionego krajobrazu), and the whole forest is recognised as a UNESCO World Heritage Site⁴¹. As Białowieża Forest is a hotspot for HCV1 values, and the FMUs are uncertified, there is a potential risk of damaging these values, considering that legislation does not cover all HCV1 identified. Furthermore, the areas have traditionally seen conflicts between forest management and NGO interests^{10,35,43} and in March 2016, the Polish authorities adopted a decision allowing for a three-fold increase in logging operations in the Białowieża Forest district, as well as for logging in areas so far excluded from any intervention (EC 13 June 2017) The Polish government argues that increased tree fells are needed to contain a bark beetle outbreak in Białowieża, although the science behind its case has been denounced by many of the world's environmental scientists (70). The EU Commission has filed a case against Warsaw at the European Court of Justice which could take years to conclude (72), however on July 27 2017, the European Court of Justice made an interim decision to request management activities to be ceased in valuable areas and within the increased logging area in the PLC200004 area of Białowieża Forest (73). Also, UNESCO threatened to put Białowieża on its list of world heritage sites in danger unless Poland halted the deforestation (72). So far the Minister of Environment has stated that Poland will not seize the harvesting, despite the ECJ request.</p> <p>A stakeholder consultation was conducted during the CNRA implementation, to highlight potential conflict issues. The consultation was carried out in July-September 2016 (prior to the higher level of felling), and complaints received related both to the FMU and the protected areas within the Białowieża Forest. Risks reported by NGOs were generally related to damage of habitats of RTE species and the habitats themselves. Damage to habitats of RTE species in the Władysław Szafer Reserve increased due to use of a harvester for tree felling, and logging of the living deciduous trees, which the complaint says did not pose any threat to road traffic. Further, there were instances of infringement of the zoning of the World Heritage Site in all three FMUs of the Białowieża Forest, which could lead to fragmentation of the RTE habitat range. There was also damage to habitats of the protected xylobiontic beetles <i>Boros Schneideri</i>, <i>Cucujus cinnaberinus</i> and woodpeckers, caused by extraction of dead trees and live trees in stands older than 100 years, which conflicts with the sustainable forest management guidelines for FMU Białowieża and Hajnówka. Furthermore, there is a risk of invasive species in extensive forest patches in nature reserves.</p> <p>The concerns above were evaluated during the implementation of the CNRA though an on-site field assessment conducted by NEPCon representatives (September-October 2016), together with FMU</p>		
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		<p>document review (see appendices C1 to C16 + C22), and consultations with key experts and stakeholders listed in “Stakeholders Consulted” and “Key experts consulted”.</p> <p>The Białowieża National Park, its buffer zone, and its reserves, are clearly delimited in the field and well protected. As for national parks, at the national level these areas do not allow any commercial logging – the only wood extraction is to take place in the form of sanitary cuttings, and only from the areas with the lowest conservation regime (the landscape conservation zone of the national park). The national park accounts for 17% of the forest on the Polish side, leaving approximately 40,000 hectares vulnerable to state-sanctioned logging (73). The national park buffer zone is managed by the surrounding FMUs, and minimum intensity silvicultural management is carried out in the buffer zone. During July-November 2016 evaluation period, the FMUs of the Białowieża Forest were allowed only to carry out single dead spruce removal along the public roads and tourism paths, including nature reserves, for public safety reasons (Polish Nature Conservation Act, Art. 15.2.3). Additionally, for fire-security reasons, all dry branches and fine wood shall be removed for a distance of at least 30m from the public road. Tree logging needs preparatory or assisting work, such as cutting damaged or obstacle trees, including deciduous trees, which may represent a threat to forest workers. Stakeholder concerns were raised about the use of a harvester for tree felling and logging of the living deciduous trees, which the complaint says did not pose any threat to road traffic. Field verification in the fall of 2016 conducted during the implementation of CNRA confirmed that some single deciduous trees were logged with no clear justification. (Appendix C8). The use of the harvester in the Hajnówka FMU was justified by security reasons during logging (appendix C7). The harvester work, and damages associated with its use, were present only in a narrow belt of the forest reserve, along the public road. Therefore, damages in relation to harvester work were of local, non-systematic character, they occurred on a very small portion of the reserve, and the logged wood was not sold but stayed in the forest for mineralisation. Use of the harvester in the reserve is not the standard approach for forest operations in reserves, and it occurred as a one-time only event. Thus, the risks in the case associated with removal of trees, as well as the use of a harvester, were not considered to be a general threat to HCV values</p> <p>Internal FMUs’ regulations applicable to all Białowieska Forest FMUs⁶⁶ do not allow extraction of dead wood from the forest ecosystems, with special attention granted to habitats of xylobiontic organisms, which are RTE species^{28,29}. The Białowieża Forest is one of the most important habitats for several xylobiontic beetles. <i>P. kolvensis</i> is known in Poland only within the Białowieża Forest, but its records are limited to the national park territory; all the others are known for the whole Białowieża Forest. These species survived under conditions of regular forest management for decades; however, their habitat preferences (mature stands, deadwood) make them vulnerable to population decline under high impact silvicultural activities. There were several cases in FMUs Białowieża and Hajnówka, where larvae of <i>C. cinnaberinus</i> and <i>B. Schneideri</i> were recorded in the wood piles prepared for transport (appendix C6 and C9). The impact of the silvicultural practices on the population of at least <i>B. Schneideri</i> could be significant (Personal communication 9), even considering that approximately 36% of the Białowieża Forest is protected within the boundaries of the national park, nature reserves, and management-excluded areas. It should be noted that the whole Belarussian part of the Białowieża Forest is covered by the national park; however, many of</p>		
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		<p>the xylobiontic organisms are characterised by low mobility, therefore, a decrease in the extent and connectivity of the habitats of the species in question should not be underestimated. However, the field verification of the extraction of dead trees in the forest revealed that felling was carried out for public security reasons, as the trees were harvested in areas close to roads and car parking lots frequented by tourists. At the time the FMU declared that the wood would not be transported out of the forest without approval from the expert, checking for the presence of vulnerable species. The limited removal of deadwood was originally not considered a general issue leading to damage of HCV 1 and to the habitats of xylobiontic beetles in the Białowieża Forest. However, recent changes in the light of 35 000 m3 of wood released to be logged as based on 2013 FMP annex require further evaluation in term of influence to assessed values. Due to dynamic situation in Białowieża FMU and lack of capacity for constant monitoring in FMU Browsk, Hajnówka, it is recommended precautionary approach should be taken and under the current situation risk should be considered specified.</p> <p>The spruce bark beetle (<i>Ips typographus</i>) outbreak (appendix C1) was considered to increase the habitat available for xylobiontic species increased manifold. Unpublished results of scientific monitoring carried out by prof. Jacek Hilszczański and prof. Jerzy Gutowski showed that each third tree that was dead for longer than two years, and approximately 40% of dead spruces, have recently been colonized by one or more species considered rare, threatened, etc. Recent calculations of the amounts of spruce deadwood standing and lying in the Białowieża forest estimate approximately 2 000 000 cubic metres. Therefore, the scale of damage generated to habitats of xylobiontic organisms by the reported harvesting was considered rather insignificant to affect the functioning of whole populations of beetles. In cases of deadwood extracted for selling, the procedure of evaluation of such wood material was implemented, as well as the obligation to leave the colonized pieces in the forest (appendix C15). However, the increased logging which, according to the Polish Environmental Minister has been put in place to stop the beetle attach might affect the habitat of the xylobiontic species.</p> <p>There have been concerns among stakeholders about an invasive species – <i>Impatiens parviflora</i> – and the lack of actions to eradicate this invasive species (Appendix C4). However, this species is not related to intentional forest management. Furthermore, the comment concerned a specific FMU, and for this specific case, actions against the invasive species are planned for 2017, under the Natura2000 management plan (PZO).</p> <p>The World Heritage Site (WHS) was established, inter alia, to protect the natural habitats for in-situ conservation of biological diversity, including threatened species of outstanding universal value from the point of view of science or conservation⁴¹, i.e. RTE species. The framework management plan of WHS defined four management zones: 1) strict protection (core area of the national park); 2) passive protection 1 (nature reserves – hunting and wood extraction excluded); 3) passive protection 2 (forests outside the national park and nature reserves, with hunting allowed, but no wood extraction); 4) sustainable forest use. Commercial logging is allowed only in zone 4⁴¹.</p>		
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		<p>hazel grouse (<i>Bonasa bonasia</i>), honey buzzard (<i>Pernis apivorus</i>), lesser spotted eagle (<i>Aquila pomarina</i>), corncrake (<i>Crex crex</i>), spotted crane (<i>Porzana porzana</i>), pygmy owl (<i>Glaucidium passerinum</i>), Boreal owl (<i>Aegolius funereus</i>), nightjar (<i>Caprimulgus europaeus</i>), white-back woodpecker (<i>Dendrocopos leucotos</i>), three-toed woodpecker (<i>Picoides tridactylus</i>), middle spotted woodpecker (<i>Leiopicus medius</i>), barred warbler (<i>Sylvia nissoria</i>), collared flycatcher (<i>Ficedula albicollis</i>) and red-breasted flycatcher (<i>Ficedula parva</i>). The IBA was classified as threatened (the assessment was conducted in 2016)³⁸, due to “the ongoing replacement of primeval forest by plantations (planted forest), through forest management, clear-felling, selective logging, and afforestation with conifers”. The logging also continues during the breeding season of birds, based on lifts of the ban offered by the Nature Conservation Act 2004. Logging and replanting old stands of natural origin leads to fragmentation (old stands become islands surrounded by much younger forests) and homogenization of age structure and species composition. Forest management in the Białowieża Forest is sustainable, but consulted ornithologists consider that the concentration of biodiversity and densities of protected species in the Białowieża Forest is outstanding, to such a level that forest management practices, as implemented in Poland, will risk damaging biodiversity. Additionally, promotion of commercial tree species (e.g.: oak, pine, spruce) at the expense of less economically important species (e.g.: hornbeam, birch) can also have negative impacts on RTE species in IBA.</p> <p>Thus, there is risk related to HCV 1 within Białowieża forest, due to issues within IBA, WHS, and due to a precautionary approach related to the decision to increase the harvesting rate within the area.</p> <p><u>The Krosno Regional Directorate of State Forests</u></p> <p>The biggest and most serious threat identified in the Carpathian Region is the development of infrastructure, which causes fragmentation of habitats and creates barriers for domestic and international ecological corridors, especially for mammals. The threats are generally not linked to forestry management, and take place especially at the bottom of the valleys that are not forested or are not under any FMU's management.</p> <p>Krosno RDSF has the highest dead wood rate of all Carpathian directories located – 17.3 m³/ha, high above the average for Poland, which is 5.8 m³/ha⁶². Also, there is a high natural regeneration rate – 30%, low density of forestry roads, and most harvest operations utilize a shelter-wood system –. Over decades, a rich biological diversity has been maintained in the course of forest management and raised. The forest management is performed in accordance with legislation and sustainable forest management rules from the Forestry Act (1991), as confirmed by PEFC certification system with certificate no. PL12/0026. No FSC certified forests are present at Krosno RDSF (as of 2017).</p> <p>However, due to technological and organizational development of forestry followed by changes in society's wildlife protection expectations, some of Krosno forestry units have become a source of conflicts of interest between NGOs and foresters. During the consultation conducted for implementation of the CNRA (Jun-Sep</p>		
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		<p>2016), and following field verification (Oct-Nov 2016), no complaints / observations / notifications relating to damage of HCV 1 have been received. New road construction and reconstruction of skidding trails in Bircza, Ustrzyki Dolne, Lesko, Komańcza, Baligród, Cisna, Lutowiska, and Stuposiany Forestry Units of RDSF in Krosno (appendix B1) pose a potential threat to bear, lynx, and protected species of birds, as well as a threat to the function of the Bieszczadzki Nationalpark forest belt as a corridor for species migration. Damage to streams, as well as wood extraction from compartments where protected or endangered species of insects, mosses, and liverworts have been identified, increase the risk level. Furthermore, there is concern about destruction of running water habitats and species due to road construction in mountain stream banks.</p> <p>Potential risks identified by stakeholders as well as risks identified during CNRA desk work have been on-site evaluated in October-November 2016 and consulted with specialists:</p> <p><u>Potential risk 1 - roads and skidding trails leading to HCV1 damage</u></p> <p>Both newly constructed and upgraded (reconstructed) roads significantly influence the environment. Such investments also change soil accessibility and water penetration rate directly in the road.. Roads previously narrow, often under canopy shadow were widen up to open line clearings of 10-20 (25) meters wide (including 3-5 meter road top). Such roads are now clearly visible across previously more intact forest. There are doubts concerning the environmental assessment process conducted for some earlier investments. On-site CNRA evaluation confirmed the roads and skidding trails investment network is minimised, to achieve the road cover rate that enables FMUs to maintain forest management. Roads were under severe underdevelopment since 1945. Despite recent development the 2016 road cover rate for Krosno RDSF is 8,9 m/ha against 15,28m/ha average in PGLLP (NFH) and highest 23m/ha in Katowice RDSF (appendix B12). Tracks are mostly closed for outside users (no public use, FMU technical use only). Forest roads do not block and are present no barrier for ecological, migration corridors (unlike the public roads and urban development observed in valleys, especially in Beskid Śląski, Beskid Sądecki, Beskid Żywiecki). After key expert consultation (2,6,7), no evidence has been found to show that forest road investments contribute to systematic decrease of biological diversity in the whole area. However, at the same time, no evidence for lack of influence has been found (e.g. appendix B8), with stakeholders indicating the cases of road upgrade and building. Therefore, a risk has been identified for the FMUs of the Carpathian Region and RDLP Krosno: Lutowiska, Stuposiany, Cisna and Bircza FMUs, such as these FMUs present most of recognised highly significant conservation values and are subject of intensive conflict related to roads. Further these are FMUs located in the proximity of the Bieszczadzki national park's buffer zone, or identified as high value by stakeholders. Precautionary approach has been used for risk determination.</p> <p>Skidding operations performed across or along waterbeds, such as mountain streams, severely influence fauna and flora linked to these fragile ecosystems. There is scientific evidence that damage is made to water brooks and waterbeds, which need 10-20 years' recovery time, and in some cases, may never recover to the same ecological level. Such wood skidding operations happened in the mountain region of</p>		
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		<p>RDLP Krosno, and have been confirmed by on-site verification. The management of RDLP Krosno has recently issued regulation no. 28 from December 2nd, 2015, which is being gradually implemented as a tool for prevention of wildlife and ecological destruction due to forest management. Foresters are aware of the risk of destroying natural values, and wherever possible, they avoid wood skidding planning with unprotected stream crossing, or dragging along waterbed. From on-site sampled FMUs water bed crossing has been found significant in Bircza FMUs and insignificant or non-existing in Rymanów, Brzozów FMUs.</p> <p>In the case of the western and southern part of the Krosno Regional Directorate, the number of natural watercourses is significantly lower, and the density of forest roads and skidding tracks is higher, which constitutes a lower risk of habitat destruction from the potential threats reported.</p> <p>Risk from skidding operations on HCV1 has been identified only in the Krosno RDSF FMUs Bircza, Ustrzyki Dolne, Lesko, Komańcza, Baligród, Cisna, Lutowska, Stuposiany Forestry Units. In listed FMUs, systematic cases have been recorded by NGOs and confirmed by CNRA on-site evaluation. In other FMUs of Krosno RDSF, none or only non-systematic cases of construction of skidding trails damaging HVC1 have been recorded.</p> <p><u>Potential risk 2. Wood extraction from compartments where protected or endangered species of insects, mosses, and liverworts have been identified</u></p> <p>The Polish section of the Carpathian Mountains contains a high concentration of protected, rare, or endangered species of animals and plants. The highest concentrations of species are protected within 6 national parks and numerous nature reserves. Many biodiversity-rich areas are still outside the boundaries of protected areas. Bircza and other neighbouring FMUs to the south of the RDSF of Krosno, are covering the biodiversity hotspot. Rare and protected species are located across commercially used forests^{42,45}. Forest management performed on a sustainable basis, has allowed the population to survive and develop over past decades. However, the concentration, especially of invertebrate and lichen species in the forests, which are difficult to recognise by forest staff, presents a potential threat for these species to be removed during forest operations, or for their habitats to be limited due to harvest operations.</p> <p>Based on complaints made by stakeholders, the threat to HCV 1 has been recognised against Bircza, Ustrzyki Dolne, Lesko, Komańcza, Baligród, Cisna, Lutowska, Stuposiany Forestry Units. (Appendix B1, B2, B3, B4, B6, B7). Due to high concentrations of RTE species, the risk of serious damage to their populations is high, especially when considering that many species have been found in Poland only in this region. Outside the listed FMUs areas of RDSF Krosno, the most valued species are either not present, or their concentration is lower. Also, the forest management infrastructure, like road density, to the south of the directory's forests, presents a lower threat to conservation values.</p> <p><u>Development of technical infrastructure in the mountain stream beds and banks</u></p> <p>Technical Investments in natural water beds were implemented in the forests of Krosno RDSF. Information submitted on potential threats to species and habitats was related to Bircza FMU, where 2 such</p>		
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		<p>investments have been made. On-site verification in “Niemiecka Dolina” showed that construction and reshaping of waterbeds severely interfered with stream ecosystems, killing fauna and flora from the stream. However, no evidence of protected or endangered species was found in the stream. Constructions (understone banks, stone bed, steps, etc.) are ecologically friendly, and built in accordance with the natural shape of the stream and the valley. This creates a potential for plants, amphibians, reptiles, fish, and other animals to return. The watercourse can be crossed undisturbed. Most important for the evaluation of threats and impacts of investment is the scale of damage to potential conservation values. Both investments in Bircza FMUs were used for a length of no more than 10 km (Niemiecka Dolina approx. 2 km). The length of all streams and brooks within the forested area of Bircza District is 628 km. Therefore, considering the risk evaluation method (low scale of non-compliance), low risk has been identified in Bircza and all other FMUs of the area with respect to retention program investments and watercourse investments. There is no indication that such constructions could be considered a scale issue, and the risk is considered low.</p> <p>Due to concentration of internationally recognised values, the precautionary approach is used. Recognised systematic threats were reported by stakeholders, and lack of evidence of operation influence / preservation measures, a risk identified in the Białowieża Forest FMUs (Browsk, Hajnówka, Białowieża) in terms of the negative effect of forest management on IBA habitat and WHS (due to high HCV1 values), and specified risks in RDSF Krosno FMUs: Bircza, Ustrzyki Dolne, Lesko, Komańcza, Baligród, Cisna, Lutowska, Stuposiany, due to the risk of damage of RTE species from wood extraction, skidding operations, road construction (Krosno) have been assessed.</p> <p>No evidence of systematic, large scale, long-lasting, significant impacts related to forest management as a threat to RTE species has been found for the rest of the country. Legal regulations for species protection are in place, and they are respected during forest operations. Therefore, with the exclusion of the Białowieża Forest and some parts of the Krosno RDSF, at the national scale, the risk for species' refuges constituting HCV 1 areas was assessed as low risk.</p> <p>Risk Conclusion</p> <p>‘Specified risk’</p> <p>Threshold (8) is met: HCV 1 is identified and/or its occurrence is likely in the area under assessment and it is threatened by management activities: for Białowieża Forest (Browsk, Hajnówka, Białowieża FMUs) and forest districts Bircza, Ustrzyki Dolne, Lesko, Komańcza, Baligród, Cisna, Lutowska, Stuposiany of Krosno Regional Directorate of State Forests</p> <p>‘Low risk’</p>		
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		Threshold (6) There is low/negligible threat to HCV 1 caused by managed activities in the area under assessment for the rest of Poland		
3.2 HCV 2	1-5, 7, 9-11, 15-19, 24, 34-40, 43, 44, 49, 56, 60	<p>Occurrence</p> <p>FSC International Guidelines define the HCV 2 category as a large forest complex that is significant for biodiversity at the global, national, or regional landscape level⁶⁰. In Poland, HCV 2 have been identified as:</p> <ul style="list-style-type: none"> <i>Forests recognized as regionally significant for the bioregion, or for a larger scale, by conservation organizations (in formally recognized reports or peer reviewed journals)^{1,2,36,38} due to the unusual landscape-scale biodiversity values related to the size and condition of the forest with respect to regional forest land cover and land use trends</i> <i>Forests that provide regionally significant habitat connectivity between larger forest areas, or between refugia and mosaics.</i> <p>The Polish large woodlands (Puszcze) are classified as regionally significant, and they provide valuable habitat connectivity. Although they represent a different degree of naturalness (e.g. from high diversity Białowieska Puszcza, through Karpacka, Romnicka to monotype pine, intensively managed Notecka Puszcza) they all correspond to the definition of “regionally significant” and are between 50-100 000 ha in size. However only woodlands larger than 100 000 ha are classified as HCVF 2. These forests contain landscape values and are significant local refugia for species, forest habitats.. Large woodlands are mainly linked to birds and large mammals depending on the extensive forest landscape (e.g., bison, wolf, lynx).</p> <p>Global Forest Watch reports there are no Intact Forest Landscapes in Poland⁵⁶.</p> <p>Threats & Safeguards identification and evaluation</p> <p>Large woodland areas in Poland are managed based on legislation and sustainable forest management rules originated under the Forestry Act (1991), and most of these areas are covered by FSC and PEFC certification systems. In the case of the Białowieska and Karpacka Puszcza Woodlands, no large-scale forest complex fragmentation, and no forest cover decrease, have been found.</p> <p>However, threats to HCV 2 have been posed recently by intensive construction and upgrading (modernization) of existing forest roads and skidding trails in the RDSF in Krosno, which enhance the possibility of forest access, and increase the rate of penetration/fragmentation of forests in the most valuable parts of the Karpacka Puszcza Woodlands. The change in “wilderness” level reported by NGOs cannot be evaluated against the HCV 2 category; however, road work in HCV 2 areas may be considered a threat based on FSC-PRO-60-002a v1.0⁵⁹.</p> <p>The evaluation process has confirmed that these roads are, in most cases, closed technical forestry roads (closed to public transports). The road coverage rate in the Krosno RDSF is the lowest in the country, and FMUs are developing constructions to modernise the wood skidding and transportation process. This road</p>	<p>Bircza, Ustrzyki Dolne, Lesko, Komańcza, Baligród, Cisna, Lutowiska, Stuposiany FMUs of the Krosno Regional Directorate of State Forests</p> <p>Rest of Poland</p>	<p>‘Specified risk’ Threshold (12) is met HCV 2 is identified and/or its occurrence is likely in the area under assessment and it is threatened by management activities: Bircza, Ustrzyki Dolne, Lesko, Komańcza, Baligród, Cisna, Lutowiska, Stuposiany FMUs of the Krosno Regional Directorate of State Forests</p> <p>‘Low Risk’ Threshold (10) there is low risk caused by management activities in the</p>

		<p>development is necessary only in the FMUs of Bircza, Ustrzyki Dolne, Lesko, Komańcza, Baligród, Cisna, Lutowska, Stuposiany of the Krosno Regional Directorate of State Forests, because these areas currently have a very low density of roads. Other forest areas evaluated in the country, including the west and south sections of the Krosno RDSF, have been recognised as not threatened by landscape depreciation caused by road building or reconstruction. The road coverage rate in these areas is sufficient for the sustainable management of forests, and if new roads are constructed, these are often located in the old track lines. Private forests are generally not subject to new road construction due to large fragmentation and sufficient coverage from local roads.</p> <p>Impact on anthropophobic animal species has also been considered during key expert consultations. There is no scientific evidence of how development of such road networks, with low intensity traffic, will influence the whole ecosystem, especially in terms of large animals, e.g. wolves (appendix B8).</p> <p>Considering the methodology for risk assessment evaluation, and the fact that the identified threat continues over a long time, and has been confirmed in a larger area, the risk for category 2 of HCV has been defined as specified for the following FMUs: Bircza, Ustrzyki Dolne, Lesko, Komańcza, Baligród, Cisna, Lutowska, Stuposiany of the Krosno Regional Directorate of State Forests.</p> <p>Risk Conclusion</p> <p>‘Specified risk ‘Threshold (12) is met HCV 2 is identified and/or its occurrence is likely in the area under assessment and it is threatened by management activities: or Bircza, Ustrzyki Dolne, Lesko, Komańcza, Baligród, Cisna, Lutowska, Stuposiany FMUs of the Krosno Regional Directorate of State Forests</p> <p>‘Low Risk’ Threshold (10) there is low risk caused by management activities in the area under assessment: Rest of Poland</p>		area under assessment: Rest of Poland
3.3 HCV 3	4, 12, 14-19, 24, 33, 37, 39-41, 58, 62, 66	<p>Occurrence</p> <p>HCV 3 are defined as forest areas that constitute of, or contain, rare, threatened, or endangered ecosystems, habitats or refugia. In the Polish context, they are best defined by the list of habitats in Annex I of the EU Habitat Directive⁵⁷. Such an approach allows harmonization of the Natura 2000 network with HCV 3, and allows the use of knowledge concerning habitat occurrence and status of conservation collected while monitoring natural habitats.</p> <p>The HCV 3 assessment is broken down into two subcategories:</p> <p>1) <i>Extremely rare and endangered ecosystems, marginal in terms of forest management</i>, i.e. thermophilous beech forests <i>Cephalanthero-Fagenion</i>, thermophilous oak forests of the <i>Potentillo albae-Quercetum</i> type, sycamore-maple-ash wet forest <i>Adoxo-Aceretum</i>, pine bogs, boreal bog-birch forests – <i>Thelypterido-</i></p>	Białowieża Forest Rest of the country.	<p>‘Specified risk’</p> <p>Białowieża Forest (Browsk, Hajnówka, Białowieża FMUs)</p> <p>Threshold (8) is met: HCV 1 is identified and/or its occurrence is</p>

	<p><i>Betuletum pubescentis</i>, spruce forests on raised peatbogs- <i>Sphagno girgensohnii</i> – <i>Piceetum</i>, which are listed by EU Habitat Directive as priority habitats^{4,14,15,16,17}.</p> <p>2) <u>Ecosystems which are rare and endangered at the European scale (listed in the Annex I of the EU Habitat Directive⁵⁷) but abundant in Poland</u> (e.g.: oak-hornbeam and lime-hornbeam forests, beech forests, fir forests).</p> <p>HCV 3 include all fragments of forest types, which are European Union Habitats¹⁴ and which are characterized by a good conservation status of RTE habitats, corresponding at least to the A or B categories of conservation status based on Natura 2000 Criteria¹⁴, and regardless of whether they are located within the limits of the established Natura 2000 sites, or outside of them. Old growth forest definition is not widely used in Poland; however, such forests are included as HCV3 through the subcategories listed above.</p> <p>In Poland, 76 habitats are recognised under the EU Habitats Directive⁵⁹, 15 of which correspond to EU priority habitats. Furthermore, only 17 habitats from the list are forest habitats (the numeric codes are given in accordance with the EU list of Natura 2000 habitats, and are followed by the English name of the forest type, and then by its phytosociological syntaxon name)⁴:</p> <p>9110 — Acidophilous beech forests (<i>Luzulo-Fagenion</i>) 9130 — Eutrophic beech forests (<i>Dentario glandulosae-Fagenion</i>, SubAll. <i>Galio odorati-Fagenion</i>) 9140 — Mountain sycamore maple forests (<i>Aceri-Fagetum</i>) 9150 — Thermophilous beech forests (<i>Cephalanthero-Fagenion</i>) 9160 — Sub-Atlantic mixed deciduous forests (<i>Stellario holostaeae-Carpinetum betuli</i>) 9170 — Medio-European and continental mixed deciduous forests (<i>Galio sylvatici-Carpinetum betuli</i>, <i>Tilio cordatae-Carpinetum betuli</i>) 9180 — Sycamore maple and lime-maple forests on slopes (<i>Tilio platyphyllis-Acerion pseudoplatani</i>) 9190 — Acidophilous oak forests (<i>Quercion robori-petraeae</i>) 91D0 — Deciduous and coniferous wet forests (<i>Vaccinio uliginosi-Betuletum pubescentis</i>, <i>Vaccinio uliginosi-Pinetum sylvestris</i>, <i>Pino mugo-Sphagnetum</i>, <i>Sphagno girgensohnii-Piceetum</i>) 91E0 — Floodplain willow, poplar, alder and ash forests (<i>Salicetum albo-fragilis</i>, <i>Populetum albae</i>, <i>Alnenion glutinoso-incanae</i>) 91F0 — Floodplain oak-elm-ash forests (<i>Ficario-Ulmetum minoris</i>) 91I0 — Thermophilous oak forests (. <i>Quercetalia pubescenti-petraeae</i>) 91P0 — Upland mixed silver fir forests (<i>Abietetum polonicum</i>) 91Q0 — Relict mountain pine forests (<i>Erico-Pinion</i>) 91T0 — Dry lichen pine forests (<i>Cladonio-Pinetum</i> and <i>Peucedano-Pinetum</i> with lichens of the <i>Cladonia</i> genus) 9410 — Mountain spruce forests (<i>Piceion abietis</i>) 9420 — Mountain mixed Swiss stone pine – spruce forests (<i>Pino cembrae-Piceetum</i>).</p>	<p>likely in the area under assessment and it is threatened by management activities:</p> <p>‘Low risk’</p> <p>Rest of the country.</p> <p>Threshold (15) is met: HCV 3 is identified and/or its occurrence is likely in the area under assessment, but areas are effectively protected from threats by management activities</p>
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		<p>Rare and endangered habitats for the EU community but of marginal importance for Polish commercial forestry are represented in 4 forest habitats. These are considered priority habitats, which forces the State to establish Natura 2000 sites where they occur, if their state of conservation is considered favourable as per definition of the EU Directive. These forest habitats are: sycamore maple and lime-maple forests on slopes (9180); deciduous and coniferous wet forests (91D0); floodplain willow, poplar, alder and ash forests (91E0); and thermophilous oak forests (91I0), considered and evaluated under this subtype of HCV3.</p> <p>There are several other forest habitats classified as rare and endangered in Europe but which are common and not endangered in Poland. The most relevant example are diverse types of mixed deciduous forests (e.g. Natura 2000 habitats 9160 and 9170 – see description above), which cover a large portion of the Polish productive forests. These are also considered to be HCV3.</p> <p>Threats & Safeguards identification and evaluation</p> <p>In Poland, EU priority forest habitats (sycamore maple and lime-maple forests on slopes (9180); deciduous and coniferous wet forests (91D0); floodplain willow, poplar, alder and ash forests (91E0); and thermophilous oak forests (91I0), are included into the Natura 2000 network; their management priority is conservation over commercial use, and they prioritize specific management tasks such as habitat maintenance or improvement. Protection Tasks Plans (PZO) are gradually being established for NATURA 2000 sites⁶⁵.</p> <p>All wet and floodplain forests are treated with special care under Polish state legislation (ordinances on EU habitats^{16,17,18}) and under internal regulations of the National Forest Holding¹². Most of them are also designated as ecosystem-service forests or protected areas, and in effect overlap with HCV 4 (water protection). Management shall not compromise the eco-system service value of the forest.</p> <p>The management of protected areas – national parks, reserves, Natura 2000 – excludes or limits wood harvesting. If harvesting is conducted (which is unusual management operation in reserves or national parks, it must be part of the Protection Plan, or a maintenance task approved by the Regional Directory of Environmental Protection. The Principles of Silviculture¹² (Zasady Hodowli Lasu) are used during the development of forest management plans and include regulations for proper felling schemes to be applied based on habitat type, and the corresponding eligible regeneration mode¹². This allows the creation of the desirable structure and species composition of regenerated forests. For instance, clear felling is used in the case of forests composed of <i>Pinus sylvestris</i>, which is a light-demanding tree species, while in mixed forests, combined or shelter-wood felling is advised to assure regeneration of trees with diverse light demands. These details of silvicultural measures provide a good safeguard for forest managers to use to maintain forest properties with HCV3. Legal compliance with these requirements are not considered to be an issue in Poland. (See 1.9)</p> <p>In other areas classified under category HCV 3, especially wet forest habitats, forest operations are carried out during periods of low-water levels or on frozen soils, to avoid damage to the soil. Also, the areas are not</p>		
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		<p>subjected to intentional changes in water regimes or water levels. In an increasing amount of cases, such forests are maintained due to “little retention” projects (damming of periodical streams, to keep the water in the ecosystem). Clear felling, in line with the Principles of silviculture¹², is avoided for such habitats; diverse types of combined felling schemes are applied to maintain/restore high spatial and age diversity of stands.</p> <p>In the case of habitat 91I0 - thermophilous oak forest (światliste dąbrowy), active nature conservation is implemented (opening of stand level, prescribed horse, cow or sheep grazing, etc.)⁶¹.</p> <p>While the areas under Natura2000 are well protected, the comparatively short period of implementation of the Natura 2000 network in Poland (since 2004) does not yet allow assessment of the real effectiveness of the implemented actions on the ground, but drafting and implementation of management plans, followed by active conservation measures and low intensity silviculture in such habitats, should provide good safeguards for this HCV category. The legislation concerning protected sites and species, as well as harvesting regulations and environmental requirements, are well implemented (See Category 1, 1.8, 1.9 and 1.10).</p> <p>RTE habitats and ecosystems have also benefited from improved forest management driven by FM certification schemes covering approximately 76% of Polish forests, i.e.: leaving hollow trees and deadwood (the national goal is 5% of total wood biomass left as deadwood in ecosystems) and establishment of the unlogged “reference areas” (about 5% of the logged stand). The monitoring of the conservation status for RTE habitats and ecosystems is conducted within the framework of the EU habitat monitoring. All forest management plans are based on precise mapping of stand and habitats, and on soil surveys; therefore, forest managers have an evidence-based knowledge of the occurrence of RTE habitats within the limits of their FMUs.</p> <p>Forest Management auditors and stakeholder information indicate there are several cases confirming better preservation and sustainable management in private forests, even if this may be unintentional, being the product of low harvesting rates (0.95 m3/ha/year in private forests vs. 4.63 m3/ha/year in the state-owned ones)¹³. Private forests are such a limited supply of timber, and usually consist on such small plots, that potential unsustainable management practices within private forests are not considered a general threat to HCV3 values.</p> <p>For Białowieża and RDSF Krosno, specific concerns have been raised by stakeholders during the implementation of the CNRA. These concerns have been followed-up by field visits in Sep-Oct 2016, to verify whether the concerns are applicable and threaten the current value or status of HCV3. Field based assessments have been conducted to evaluate the concerns raised by stakeholders during the implementation of the CNRA. Comments received concerning HCV3 have been provided by WWF Poland, Wildlife Heritage Foundation (Fundacja Dziedzictwo Przyrodnicze), Wilde Poland Foundation (Fundacja Dzika Polska).</p>		
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		<p>Białowieża Forest</p> <p>The Białowieża Forest plays an important role for HCV 3 conservation of peatbog spruce forests, wet and bog forests, and other coniferous types of forest (91D0), as well as riparian forests of the 91E0 type. The other Natura 2000 habitats occur on such a small spatial scale that they are not ecologically sustainable and should not be considered as reasons for the establishment of HCV3 (appendix C2). The forest habitat xerothermic oak forest (91I0) is the only non-hydrogenic habitat on the forest list for Poland. It needs intervention to be kept in good conditions, and logging is only conducted for habitat maintenance. The importance of this habitat as a source of wood supply is very low in the Białowieża Forest due to its very small area (a few hectares)⁴¹. The management details are described in the Plan of conservation tasks of the Natura 2000 site (see annex C2).</p> <p>During implementation of the CNRA, several issues were raised by NGOs, which were evaluated during an onsite field assessment in the autumn of 2016. The comments were related to single specific incidents, but collectively show a concern about the status of some of the HCV values of the forest. The detailed list of concerns by stakeholders and corresponding evaluations can be found in annex C1-C23. With 2017 decision to release formerly FMP government ⁷⁰ approved but increased logging, there is a potential risk that HCV3 values could be damaged. In the Interim Decision by the European Court of Justice it is requested that logging within the natural areas and old forests (over 100 years) under 9170 shall be ceased. The Minister of Environment stated on 31. July 2017, that Poland would not cease the harvesting, but whether they will adhere to parts of the ECJ request is not yet known. An official response to the ECJ is expected on 4. August 2017 (73). However, the increased logging might cause a threat to HCV3 values, and based on a precautionary approach the risk should be considered specified till it is possible to further evaluate the extent of logging and related damage to HCV.</p> <p>In relation to oak-hornbeam forests (<i>Tilio-Carpinetum</i>) Concerns have been raised by stakeholders about threats with in Białowieża by artificial regeneration of stands with single species, <i>Pinus sylvestris</i>, and degradation of the quality of the HCV due to removal of deadwood.</p> <p>The specific complaint concerning <i>Pinus sylvestris</i> in oak-hornbeam forest was linked to a single case in the Białowieża Forest, and the onsite verification in late 2016 showed that the issue was not affecting a large area, and that it was not systematic. While this clearly damages the HCV3 value for the stand, other sites inspected during onsite verification in the fall of 2016 proved that the reported threat was not systematic, was limited in area (appendix C12-C14), and at the time not interpreted as a significant threat to the natural habitat of oak-hornbeam forests (<i>Tilio-Carpinetum</i>), which covers over 50% of the Białowieża Forest. Natural regeneration represents a considerable share of all regeneration after harvesting. The field verification conducted during the CNRA also showed that the amount of deadwood in the oak-hornbeam (<i>Tilio-Carpinetum</i>) forests in the Białowieża Forest is reasonably high, and was increasing due to an ongoing spruce bark beetle outbreak. Forest management is not considered a threat to these habitats, partly because large parts of this habitat are located within the national park and the nature reserves (appendix C10, C11, C11b). Many areas of this habitat are also excluded from forest management</p>		
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		<p>(appendix C10). While oak-hornbeam (<i>Tilio-Carpinetum</i>) forests are considered rare or endangered habitats in other parts of Europe, this is not the case for this region of Poland. Habitat patches in the National Park were found to be in favourable state of conservation (FV), while those outside the national park are in unfavourable status (U1) due to three traits: vertical structure of the stand (homogenous), share of spruce (high), and amount of deadwood (lower than in the national park) (appendix C2). The status of the habitat is however stable. This is due to a decrease of spruce share in stands, and natural conversion of forest into oak-hornbeam forests. There are no indications of further deterioration of these habitats.</p> <p>During the field visits, several cases of ground skidding (dragging) were recorded. This kind of ground skidding causes damages to forest floor vegetation and soil, and is against internal regulations for FMUs, regulations of the Regional Directorate of State Forests in Białystok, and PEFC standards. However, from the point of view of the HCV 3 Polish classification, this kind of skidding does not represent a threat, as it was observed only incidentally and rarely registered in HCV 3. The damages were generally limited to the existing skidding trails only.</p> <p>There are no indications that invasive species are threatening HCV3 areas due to management activities.</p> <p>RDSF Krosno</p> <p>Endangered habitats, especially those of most significant value, and preserved in good conservation state, have been recognised during the process of elaboration of NATURA 2000. For many sites in RDSF Krosno, the Protection Task Plan (PZO) has been or is currently being elaborated by the Regional Directorate of Environmental Protection in Rzeszów (RDOŚ). The system shall ensure that rare habitats are not threatened by forest management. FMUs are required to operate following the Protection Task Plan, with habitat protection established by experts as a priority. New FMPs are often aligned with PZO. Execution of Protection Task Plan and quality of habitats, are both monitored by the Regional Directorate of Environmental Protection, according to the NATURA 2000 schedule and to the Nature Conservation Act, which are well implemented (See category 1, 1.9).</p> <p>During the CNRA evaluation process, stakeholders raised concerns about forest operation activities in alluvial forests (<i>Carici remotae-Fraxinetum</i> (91E0)) in Bircza FMU (RDLP Krosno) (Appendix B2, page 22-25). Alluvial forests are generally well recognised in the area covered by RDLP Krosno, and the habitats are identified in FMPs and covered by PZO (Protection Task Plan for Natura 2000). Small patches of 91E0 habitats are located outside NATURA 2000, and linked to habitats of alluvial forests of marginal stands located along the small rivers and streams at the bottom of valleys. The valleys are often used as public and forest roads. Due to the infection of <i>Fraxinus excelsior</i> with the pathogenic fungus <i>Hymenoscyphus pseudoalbidus</i>, ash trees are dying off, which creates a threat to the safety of passing cars and workers. Such trees shall by law be cut if they are considered a threat to safety. Onsite verification showed that such trees were harvested and taken off the site, instead of remaining at the site for biodiversity reasons. Other</p>		
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		<p>similar sites with alluvial forest were visited, including harvested sites with wood extraction due to safety reasons. Trees cut down were left as deadwood on the sites. Harvesting in alluvial forest is conducted at a low scale, and therefore not considered to be a general threat to the HCV3 value. No management or only limited forest management is currently under way in HCV3 habitats, and this only for safety reasons or under the Natura2000 management plan.</p> <p>Risk conclusion</p> <p>‘Specified risk’</p> <p>Białowieża Forest (Browsk, Hajnówka, Białowieża FMUs)</p> <p>Threshold (8) is met: HCV 1 is identified and/or its occurrence is likely in the area under assessment and it is threatened by management activities:</p> <p>‘Low risk’</p> <p>Rest of the country.</p> <p>Threshold (15) is met: HCV 3 is identified and/or its occurrence is likely in the area under assessment, but areas are effectively protected from threats by management activities</p>		
3.4 HCV 4	3, 20-22, 24, 33, 39, 40, 46, 47, 61	<p>Occurrence</p> <p>HCV 4 are forest areas that provide basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes^{24,60}. For practical reasons, for this assessment these are broken down into two groups:</p> <p><u><i>Watershed protection forests</i></u></p> <p>This HCV includes forests that protect groundwater and surface water resources on damp and marshy habitats, and forests within areas temporarily flooded along rivers, streams, and other water reservoirs (i.e. often overlapping with HCV 3 types of rare wet forest habitats This category is designed in concordance with existing legal regulations for criteria of designation and rules of management of protective forests in Poland³³, which recommend the establishment of water protective forests when these are:</p> <p>a) forests covering river and stream sources;</p> <p>b) forests located along rivers, streams, channels, lakes, and other water reservoirs:</p> <ul style="list-style-type: none"> - in the mountains- forests located between water banks and the closest natural lines in the area; - in the lowlands- forests located on floodplains during average water height, around water reservoirs <p>forests located between the reservoir bank and the closest natural line in the area around the reservoir;</p>	Poland	<p>‘Low Risk’</p> <p>Threshold (20) is met: There is low/negligible threat to HCV 4 caused by management activities in the area under assessment</p>

		<p>c) forests located in the buffer zones of groundwater reservoirs, and within the borders of water sources and water intake buffer zones, designated in accordance to the water law regulations;</p> <p>d) forests on damp and marshy habitats³³.</p> <p><u>Erosion control forests.</u></p> <p>These are forests important for the maintenance and conservation of soils. They are defined based on the same ordinance of the ministry of the environment as forests important for the maintenance of water resources³³. Most of Poland is in the lowlands, where soils are not threatened by erosion. Therefore, the forests with the dominating soil protection function amount to only 4.6% of the total forest cover. They are established:</p> <p>a) on cliffs, sea dunes, and adjacent coastal areas,</p> <p>b) on inland dunes, within the area of sand dunes, with a tendency to migrate,</p> <p>c) on steep and bluff mountain slopes, including (depending on the layer), average gradient:</p> <ul style="list-style-type: none"> - more than 20° on the southern, south-western, and western mountain side, on shallow soil up to 25 cm depth, and 25° on deeper soil; - more than 30° on the northern, north-western, north-eastern, and eastern mountain side, on shallow soils up to 25 cm depth, and 35° on deeper soil, <p>d) on the slopes with tendency to landslide with slopes over 20°,</p> <p>e) on steep slopes of ravines, gullies, and hills, where gradients of more than 20° steepness dominate on loose soils, and more than 35° steepness dominates on dense soils; however, the boundary of the protective forest shall be located within 30-50 meters of the hill side,</p> <p>f. in the upper tree line zone³³.</p> <p>Threats & Safeguards identification and evaluation</p> <p>Water catchments covered by forests are important for the conservation of drinking water resources. There is no threat posed by forest management activities to Poland's drinking water resources, as they are well protected by conservation measures implemented directly in the field by forest management plans, resulting from the Forestry Act (1991) and its lower level regulations. Poland, as part of the EU, is following European laws concerning drinking water, including, inter alia, regulations of the European Water Framework Directive No. 2000/60/WE⁴⁶ implemented by Polish legislation under the Water Act (2001)⁴⁷. The adequate conservation measures are already in place in the whole country, and they address all important aspects of the HCV 3 category. The designated areas are thus adequately protected under existing legislation and practices, which are considered well implemented (See indicator 1.9 and 1.10).</p> <p>The EU has not developed any directive devoted directly to the problem of soil protection. In Polish forests, this issue is partly covered by the Forestry Act (1991), and even further by the Environment Conservation Act (2001), which requires all land owners and land managers to maintain soils in the best possible status by preventing soil erosion, decrease in humus content, negative change in compaction, salinity, and</p>		
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		<p>reaction (pH)²⁰. Based on this Act, the Polish ministry of the environment issued regulations specifying standards for soil and ground quality²¹. This ordinance specifies, inter alia, acceptable thresholds of soil pollution and erosion. Additionally, all forested lands and farmlands are protected from conversion to other types of use by the Act for protection of agricultural and forest grounds (1995)²². Therefore, it should be concluded that this subcategory of HCV 4 is well protected by existing legal regulations and forest management systems. Legislation is thus well implemented (see indicator 1.10).</p> <p>Risk conclusion</p> <p>Low Risk'</p> <p>Threshold (20) is met: There is low/negligible threat to HCV 4 caused by management activities in the area under assessment</p>		
3.5 HCV 5	24	<p>There are no native or local communities depending on forests to sustain their basic needs²⁴. During public consultations, carried by managers of FSC certified FMUs to identify possible HCV 5 areas, no such areas have been established in any of the certified FMUs in Poland. As most Polish forests are covered by certification (72% by FSC), this can be considered to reflect all of Poland.</p> <p>There is no HCV 5 in Poland, and its occurrence is unlikely in the area under assessment.</p>	Poland	<p>'Low Risk'</p> <p>Threshold (23) is met: There is no HCV 5 in Poland, and its occurrence is unlikely in the area under assessment.</p>
3.6 HCV 6	23, 24, 65	<p>Occurrence</p> <p>Archaeological sites or sites listed as national cultural heritage in accordance with the Act on Conservation and Maintenance of Cultural Heritage²³ are considered HCV6 areas and protected by legislation.</p> <p>Areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with local communities) are also considered HCV 6²⁴. Therefore, the opinion of local communities, expressed in local media, interviews, articles, speeches, petitions, or recognized by social communication means, is used for designation of HCV6 in Poland.</p> <p>Threats & Safeguards identification and evaluation</p> <p>In Poland, all officially recognized cultural/archaeological sites are registered on the List of Cultural Heritage, which is developed and maintained by each regional Conservator of Cultural Heritage, in concordance with the Act on Conservation and Maintenance of Cultural Heritage (2003). Usually, all</p>	Poland	<p>'Low Risk'</p> <p>Threshold (30) is met: HCV 6 is identified and/or its occurrence is likely in the area under assessment, but it is effectively protected from threats caused by</p>

		<p>recognized and registered cultural heritage sites covered by forests are listed in the forest management plans and protected from management activities. The level of knowledge about cultural and archaeological heritage in Poland is detailed, due to the long-lasting registration of all sites found during the field surveys or reported by finders. There are close to 72,000 cultural heritage objects, and close to 8,000 archaeological sites registered. The level of knowledge about this subject is quickly increasing, especially during the last years, due to the LIDAR scanning program (Remote sensing method) of the whole territory of Poland, which allows desk analyses and identification of potential sites of importance from the cultural point of view. Unregistered or unrecognized (unknown) sites are protected by the regulations of the Act on Conservation and Maintenance of the Cultural Heritage, which requires any finders of archaeological artefacts to report these to the Regional Conservation of Cultural Heritage (2003). Any archaeological site accidentally discovered during forest management is legally secured in the field, and reported to the Regional Conservator of Cultural Heritage responsible for the area.</p> <p>The Polish system of protection of monuments is headed by the Ministry of Culture and Heritage, and lead by the National Heritage Board of Poland. This system supports actions to identify and protect HCV6 values, such as exploration work and projects run by the scientific communities. In addition to these activities and institutions, there are several projects of multidisciplinary and inter-institutional character, which are part of a group of initiatives for the protection of monuments, as exemplified by either local or country-level agreements, e.g. an agreement on March 4, 2011, between the National Holding of State Forests and the National Heritage Institute, aimed at implementing the project "Rehabilitation purposes of degraded military areas, managed by NFH" ⁶⁴</p> <p>All areas critical to local communities' traditional cultural identity are identified during management planning, in close cooperation between forest managers, local authorities, and local citizens. The procedure of HCV 6 identification, conducted by forest managers, includes public consultations on the subject, and asking local communities to identify important places from the cultural, historical, or patriotic point of view. In most cases, HCV 6 areas are designated in manor parks, urban forests, forests of important historical sites, war graveyards located in forests, which are traditionally protected by local communities, despite lacking legal protection.</p> <p>Poland is a strongly Catholic country, with a stormy history, which has caused Polish society, including foresters, to have a strong patriotic and religious approach, which creates incentives for the forest managers to secure historic and religious sites.</p> <p>All such sites located in forests are duly cared for by tools established in management plans, as well as by national patriotic attitude.</p> <p>Risk conclusion</p> <p>Low Risk'</p>		management activities
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		Threshold (30) is met: HCV 6 is identified and/or its occurrence is likely in the area under assessment, but it is effectively protected from threats caused by management activities		
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Recommended control measures

Indicator	Recommended control measures
3.0	NA
3.1 HCV 1	<p>Regarding timber from the Browsk, Hajnówka, and Białowieża FMUs: Seek evidence of the harvest location:</p> <ul style="list-style-type: none"> - protokół odbioru prac (operation protocol), - szkic zrębowy (felling scheme), - wydruk pozycji rębnej z SILP z oświadczeniem leśniczego o pochodzeniu drewna (registry print out with forester's claim on origin). <p>Only wood harvested from compartments classified as zone 4 WHS that are outside IBA areas, or that has been harvested outside the bird breeding period (1 March - October 15th) may be accepted as low risk.</p> <p>In addition, the following should be considered:</p> <ul style="list-style-type: none"> - The silviculture should not increase fragmentation and isolation of old-growth areas, - An environmental impact assessment should be conducted for each felling site prior to wood felling and extraction, with special attention paid to IBA's triggering species populations, and Outstanding Universal Value of the World Heritage Site. The EIA can be obtained from the FMU. - Companies should seek to add a statement in their contracts with suppliers of controlled material that reads: 'We do not buy timber from the Białowieża Forest'. This timber is recognizable easily because it is sold only by the three FMUs of the Białystok RDSF: Białowieża, Browsk and Hajnówka. <p>The following control measures are recommended for timber from the following FMUs within the Regional Directorate of State Forests in Krosno: Bircza, Ustrzyki Dolne, Lesko, Komańcza, Baligród, Cisna, Lutowiska, Stuposiany:</p> <p>a) Each wood material purchase from the specified risk FMUs shall be accompanied by information on:</p> <ul style="list-style-type: none"> - district, sub-district, compartment, and sub-compartment number (the geoportal at http://www.straznicipuszczy.pl/ may also be used) - type of logging (regular FMP harvest, sanitary harvest, investment connected harvest) <p>An EIA shall be available to show appropriate measures for road construction has been taken</p>
3.2 HCV 2	<p>The following control measures are recommended for timber from the following FMUs within the Regional Directorate of State Forests in Krosno: Bircza, Ustrzyki Dolne, Lesko, Komańcza, Baligród, Cisna, Lutowiska, Stuposiany:</p> <p>a) Each wood material purchase from the specified risk FMUs shall be accompanied by information on:</p> <ul style="list-style-type: none"> - district, sub-district, compartment, and sub-compartment number (the geoportal at http://www.straznicipuszczy.pl/ may also be used) <p>An environmental assessment shall be available. The EIA can be obtained from the FMU.</p>
3.3 HCV 3	<p>Generic:</p> <p>It is important to remember that the appropriate way to maintain or enhance each value will depend on the value itself. There are a variety of possible options to maintain or enhance various HCVs, which include:</p> <ul style="list-style-type: none"> • Conservation set-asides (e.g. appropriately designed protected areas, buffer zones, habitat corridors) • Restoration (e.g. remediation of previous damage to ecosystems, reintroduction of hunted species, creation of wildlife corridors between forest blocks) • Reduced impact harvesting operations (e.g. reduced impact logging techniques or continuous cover forestry) • Infrastructure planning (e.g. improved road building) • Scheduling of operations (e.g. planning logging coupe schedules to benefit wildlife) • Control of hunting and fishing (e.g. managing access and methods, providing affordable protein alternatives)

	<ul style="list-style-type: none"> • Community development and livelihoods projects (e.g. employment and healthcare) • Local government and NGO support (e.g. extending or renewing leases, preventing inappropriate development, supporting company conservation initiatives). Country Specific
3.4 HCV 4	NA
3.5 HCV 5	NA
3.6 HCV 6	NA

Information sources

No.	Source of information	Relevant HCV category and indicator
1.	Tomiałojć W., Wesołowski T. (2005). The avifauna of Białowieża Forest – a window into the past. British birds, 98: 174-193.	3.0, 1, 2
2.	Grabińska B (2011)., Uwarunkowania naturalne i antropogeniczne rozmieszczenia ssaków łownych w Polsce. [Natural and anthropogenic factors influencing distribution of game in Poland]. PAN, Instytut Geografii i Przestrzennego Zagospodarowania im. Stanisława Leszczyckiego, Warszawa 2011.	1, 2
3.	PGLLP (2015) „Lasy w Polsce 2015”. (Forests in Poland – summary of national forestry report 2015). General Directorate of State Forests in Poland. Available at: http://www.lasy.gov.pl/informacje/publikacje/do-poczytania/lasy-w-polsce-1/lasy-w-polsce-2015	overview, 1, 2, 4
4.	Główny Inspektorat Ochrony Środowiska (N.Y) Lista rankingowa typów siedlisk przyrodniczych. Monitoring gatunków i siedlisk przyrodniczych ze szczególnym uwzględnieniem obszarów ochrony siedlisk Natura 2000., Warszawa [The list of natural habitats. Monitoring of the species and the habitats with special attention paid to Natura 2000 sites.] General Inspectorate of the Protection of Environment.	3.0, 1, 2, 3
5.	Olson, D. M, et. Al. (2001). Terrestrial ecoregions of the world: a new map of life on Earth. Bioscience 51(11):933-938. Available at: http://www.worldwildlife.org/publications/terrestrial-ecoregions-of-the-world	1, 2
6.	Zielony R. and Kliczkowska A. (2010). Regionalizacja przyrodniczo-leśna Polski [Forest Regionalization of Poland]. Centrum Informacyjne Lasów Państwowych. General Directorate of State Forests in Poland	1
7.	Olson, D. M. and Dinerstein, E. (2002). The Global 200: Priority ecoregions for global conservation. Annals of the Missouri Botanical Garden 89(2):199-224. Available at: https://www.worldwildlife.org/publications/the-global-200-priority-ecoregions-for-global-conservation	1, 2

8.	Gorzelak, A. (Red.). (2001). Gospodarowanie w lasach drobnej własności [Management in the forests of small ownership]. Warszawa: Instytut Badawczy Leśnictwa. Polish Forest Research Institute.	1
9.	Dmochowska, H. (Ed.). (2016). Concise statistical yearbook of Poland 2016. Warszawa: Central Statistic Office. Available at: http://stat.gov.pl/obszary-tematyczne/roczniki-statystyczne/roczniki-statystyczne/maly-rocznik-statystyczny-polski-2016,1,17.html	overview, 1, 2
10.	Chylarecki, P. and Selva, N. 2016. Ancient forest: spare it from clearance. Nature 530(7591):419-419. Available at: http://www.nature.com/nature/journal/v530/n7591/full/530419b.html	1, 2
11.	FSC Watch.org (2008). Comments on certification of the Białowieża Forest in 2008. Available at: http://www.fsc-watch.org/archives/2008/01/24/FSC_certification_th	overview, 3.0, 1, 2
12.	General Directorate of State Forests in Poland (2003). Zasady Hodowli Lasu [Principles of Silviculture]. 2003. Warszawa: Generalna Dyrekcja Lasów Państwowych, 159 pp.	overview, 3.0, 1, 3
13.	Król A. (2014). Prywatne znaczy gorsze? O sytuacji prywatnych właścicieli lasów w Polsce. [Does private means worse? A situation of private forest owners in Poland]. Forest National Panel "Development" Polish Forest Research Institute. Available at: http://www.npl.ibles.pl/prywatne-znaczy-gorsze-o-sytuacji-prywatnych-wlascieli-lasow-w-polsce	1
14.	European Commission DG Environment (2013). Interpretation Manual of European Union Habitats. EUR 28. April 2013. Available at: http://ec.europa.eu/environment/nature/legislation/habitatsdirective/docs/Int_Manual_EU28.pdf	3
15.	Polish Ministry of Environment (2013). Rozporządzenie Ministra Środowiska z dnia 6 listopada 2013 r. zmieniające rozporządzenie w sprawie siedlisk przyrodniczych oraz gatunków będących przedmiotem zainteresowania Wspólnoty, a także kryteriów wyboru obszarów kwalifikujących się do uznania lub wyznaczenia jako obszary Natura 2000 (Dz. U. z 2013 r. Nr , poz. 1302) [Ordinance of the Minister of Environment from 6th of November 2013 on the natural habitats and species being of interest to European Community and on criteria of designation of Natura 2000 Sites].	1, 2, 3
16.	Polish Ministry of Environment (2012). Rozporządzenie Ministra Środowiska z dnia 9 sierpnia 2012 r. zmieniające rozporządzenie w sprawie siedlisk przyrodniczych oraz gatunków będących przedmiotem zainteresowania Wspólnoty, a także kryteriów wyboru obszarów kwalifikujących się do uznania lub wyznaczenia jako obszary Natura 2000 (Dz. U. z 2012 r. Nr , poz. 1041)[Ordinance of the Minister of Environment from 9th of August 2012 on the natural habitats and species being of interest to European Community and on criteria of designation of Natura 2000 Sites]	1, 2, 3
17.	Polish Ministry of Environment (2010). Rozporządzenie Ministra Środowiska z dnia 13 kwietnia 2010 r. w sprawie siedlisk przyrodniczych oraz gatunków będących przedmiotem zainteresowania Wspólnoty, a także kryteriów wyboru obszarów kwalifikujących się do uznania lub	1, 2, 3

	wyznaczenia jako obszary Natura 2000 (Dz. U. z 2010 r. Nr 77, poz. 510) [Ordinance of the Minister of Environment from 13th of April 2010 on the natural habitats and species being of interest to European Community and on criteria of designation of Natura 2000 Sites].	
18.	General Inspectorate of the Protection of Environment. (2012). Report on the state of conservation of the Natura 2000 habitat and species in Poland for the period 2007-2012. Available at: https://bd.eionet.europa.eu/article17/reports2012/	1, 2, 3
19.	General Inspectorate of the Protection of Environment (N.Y). Details of the monitoring of the Natura 2000 habitat and species in Poland. Available at: http://siedliska.gios.gov.pl/pl/monitoring/monitoring	2, 3
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List of additional Information sources, stakeholder consultation documents, exhibits

Appendix No.	Name of document or content
B1.	Fundacja Dziedzictwo Przyrodnicze” Rozbudowa dróg leśnych i pozyskanie drewna w nadleśnictwach bieszczadzkich 2015” // Wildlife Heritage Foundation „Forest roads construction in Bieszczady forest management districts 2015.
B2.	Fundacja Dziedzictwo Przyrodnicze „Wniosek dotyczący rezygnacji z cięć w wydzieleniach leśnych w których stwierdzono cenne, chronione, nowe dla Polski i zagrożone wyginięciem gatunki chrząszczy, porostów, mchów i wątrobowców oraz rezygnację z cięć w cennych siedliskach przyrodniczych Natura 2000 na terenie Nadleśnictwa Bircza Wildlife Heritage Foundation „Application for cutting deletion in Bircza FMU compartments where rare, endangered or protected species has been recorded”.
B3	Pismo Generalnego Dyrektora Ochrony Środowiska z dnia 22.12.2014 w spr. odwołania decyzji RDOŚ w Rzeszowie i ustanowienia strefy ochronnej Granicznika płucnik. a <i>Lobaria Pulmonaria</i> na tere Nadleśnictwa Bircza. Decision of General Director of Environmental Protection Department dated 22.12.2014 on rejection of RDOŚ Rzeszów decision and confirming protection zone call for <i>Lobaria Pulmonaria</i> at Bircza FMU.
B4	Opinia Regionalnej Dyrekcji Ochrony Środowiska w Rzeszowie z dnia 18.04.2016 odrzucająca konieczność wstrzymania cięć na terenie Nadleśnictwa Bircza. Formal opinion / decision of Regional Environmental Protection Directory in Rzeszów dated 18.04.2016 rejecting harvest suspension in Bircza FMU
B5	Pismo RDOŚ w Rzeszowie dot odmowy ustanowienia strefy ochronnej dla Bociana czarnego na terenie Nadleśnictwa Bircza. Regional Environmental Protection Directory in Rzeszów Rejection of application to settle protection zone for Black Stork 19.06.2015
B6	RDLP Krosno. The map of 2010 – 2015 new forest road investments in Bieszczady located FMUs.

B7	RDLP Krosno. Mapa wzrostu lesistości na terenie nadleśnictw bieszczadzkich w latach 1946-2015 RDLP Krosno. Bieszczady FMUs forest rate change map for 1946-2015 period.
B8	Prof. dr hab. Henryk Okarma, Instytut Ochrony Przyrody PAN – opinion regarding influence of forestry roads to brown bear.
B9	Szkic cięć odnowieniowych na 2016 rok Nadleśnictwo Rymanów, L-ctwo Bieszczady – 2016 regeneration cut plan for Bieszczady subdistrict, Rymanów FMU
B10	Cieki wodne w Nadleśnictwie Bircza, RDLP Krosno. Water courses and rivers at Bircza FMU, Krosno RDSF.
B11	Mapa cieków wodnych w Nadleśnictwie Bircza, RDLP Krosno. Map of water courses at Bircza FMU, Krosno RDSF.
B12	RDSF Krosno stakeholder input on CNRA.cat. 3 18 November 2016
B13	Consultation on CNRA with Environmental Protection Regional Directory in Rzeszów 31.10.2016
C1	Jerzy M. Gutowski, Bogdan Jaroszewicz „Zmiany udziału świerka pospolitego w drzewostanach Puszczy Białowieskiej w kontekście dynamiki liczebności kornika drukarza <i>Ips typographus</i> (L.)” 2016 Jerzy M. Gutowski, Bogdan Jaroszewicz „ <i>Picea abies</i> composition rate change in Białowieska Puszcza stands in context of <i>Ips typographus</i> dynamics.
C2	dr hab. Bogdan Jaroszewicz, Białowieska Stacja Geobotaniczna Wydział Biologii Uniwersytetu Warszawskiego - Opinia o sytuacji w Obiekcie Światowego Dziedzictwa UNESCO „Białowieża Forest”.
C3	Walankiewicz Białowieska Stacja Geobotaniczna Wydział Biologii Uniwersytetu Warszawskiego „Distribution of whitebacked woodpecker in Białowieża Forest in 2010”.

C4	Krzysztof Kajzer, Wojciech Sobociński „Raport końcowy podsumowujący temat badawczy: „Monitoring populacji dzięcioła białogrzbietego <i>Dendrocopos leucotos</i> i dzięcioła trójpalczastego <i>Picoides tridactylus</i> na stałej powierzchni próbnej oraz kontynuacja określenia czynników determinujących występowanie tych gatunków w zagospodarowanej części Puszczy Białowieskiej” STUDIO OPRACOWAŃ PRZYRODNICZYCH KRZYSZTOF KAJZER, Białowieża/Warszawa, październik 2015 r.
C5	Zmiany granic obszaru dziedzictwa UNESCO Puszczy Białowieskiej. Bialowieska Forest UNESCO border change.
C6	HCVF risk evaluation according to NGOs “Fundacja Dzika Polska “ and WWF Polska – CNRA stakeholder consultation. 2016.
C7	Justification of safety cuts performed in Szafer nature reserve in Bialowieska Forest. Hajnówka FMU 12.10.2017.
C8	Report and registry of trees removed during safety cuts in Szafer nature reserve in Bialowieska Forest. NGOs complaint. 2016.
C9	Adam Bohdan, Wojciech Bartos – report on saproxylic beetles habitat spots destroyed in Hajnówka FMU, comp. 702Ba. 2016.
C10	Areas excluded from management in Bialowieza FMU. 2016.
C11	Map of planned harvesting operations for 2012-2021 in Bialowieza FMU
C11b	Protection status statistics for Bialowieza FMU 2016.
C12	Oak seedlings used for regeneration at 9170 habitat inventory at Hajnówka FMU. 2015
C13	Oak seedlings used for regeneration at 9170 habitat inventory at Hajnówka FMU. 2016
C14	Oak seedlings used for regeneration at 9170 habitat inventory at Hajnówka FMU. 2016
C15	Office note on tree removal at Szafer Reserve by Head of Białowieża FMU. 31.08.2016
C16	Consultation on HCVF cat.3 CNRA with General Directorate of State Forest in Białystok 31.11.2016

C19	NATURA 2000 – Standard data form for Bialowieska Forest
C20	Adam Bohdan, Wojciech Bartos, Dawid Kaźmierczak, Dariusz Gatkowski „Ocena zagrożeń lasów o szczególnej wartości ochronnej (HCVF) w Puszczy Białowieskiej 2016. “Risk assessment of HCVF in Białowieska Puszcza” – NGOs consultation on cat. 3 of CNRA 2016.
C21	Wildlife monitoring procedurę of Białystok RDSF 2014
C22	Order no 16/2014 of RDSF Białystok Director on wildlife monitoring and influence of management operations on forest biodiversity.
C23	Order no.20/16 of Białowieża Head Forester, guidance on forestry operation impact mitigation 28.04.2016

Controlled wood category 4: Wood from forests being converted to plantations or non-forest use

Risk assessment

Indicator	Source of information	Functional scale	Risk designation and determination
4.1	<p>The Law on the protection of agricultural and forest lands Dz.U. 1995 nr 16 poz. 78. dated on February 1995 r. (Ustawa z dnia 3 lutego 1995 r. o ochronie gruntów rolnych i leśnych). Available at: http://isap.sejm.gov.pl/DetailsServlet?id=WDU19950160078</p> <p>"State Forests, State Authority</p>	-	<p>Content of law</p> <p>State Forests may not convert forest area to non-forest use. Conversion can take place only after transferring the land supervision from State Forest to General Directorate of National Roads and Motorways; but it is done based on the law in force (Act on road construction) and must be approved by the Ministry of Environment. So forest land is converted to non-forest when it no longer belongs to State Forests. This occurs in cases when a planned road goes through the forest area or close to the forests.</p> <p>Conversion of private forest to non-forest use is admissible however complicated and difficult.</p> <p>Private owners may ask for approval of Voivodship Head (the head of County), but it is mostly unlikely that the approval will be granted). The exception may be related to agriculture plantations or naturally afforested agriculture land. No records exist related to violation of this requirement in Poland, and misuse of permits have not been identified as an issue in category 1.4.</p> <p>Only Ministry of Environment may issue legal document for land conversion from forest to non-forest type of use.</p> <p>Is the law enforced?</p> <p>There are no known cases of illegal conversion, and no issues on lack of issuing permits, as stated / identified in category 1.4</p> <p>Is it possible to conclude that the spatial threshold (0.02% or 5000ha) is met?</p>

			<p>The law does not prohibit conversion to the outcomes in the indicator, however due to the legal framework it is essentially impossible to carry out conversion on private land.</p> <p>According to conversation with representative of Regional Directorate of State Forests in Wroclaw, illegal conversion has not occurred in Poland for many years.</p> <p>Risk designation</p> <p>Undesignated risk</p>
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Recommended control measures

N/A