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**Standing Committee**

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**Group of Specialists on the  
European Diploma for Protected Areas**

8 March 2017

Palais de l'Europe, Strasbourg, Room 6

**FOLLOW UP ON THE 2016 CONCLUSIONS OF THE GROUP OF  
SPECIALISTS REGARDING POLONINY NATIONAL PARK**

**OPINION ON POLONINY NATIONAL  
PARK' MANAGEMENT PLAN**

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## FOREWORD

This note has been prepared in response to a request by the Secretariat of the Bern Convention.

It gives the opinion of the two experts on the document entitled “*Poloniny National park Management Plan for 2017-2026*”, as approved by the Government Resolution of the Slovak Republic N°293 dated / July 2016 (Attachment 1).

## HISTORICAL BACKGROUND

The Poloniny National Park (PNP) was awarded with the European Diploma of protected area in 1998; since then, the State Party has been urged to adopt and implement a management plan for this area, in order to comply with the regulation of the European Diploma.

- the Committee of Ministers has conditioned the renewal of the diploma to the PNP in 2003, 2008 and 2012, to the adoption and implementation of a management plan meeting the obligation of the State Party to manage the diploma holding in “*an exemplary way*”, in the sense of the regulation of the European diploma (Res. CM/ResDip(2008)1) ; this plan should have been in place initially by 2010, at the latest ;
- in 2012, an extraordinary on the spot appraisal was led, concluding on a detailed work agenda agreed with the State Party which committed to deliver the PNP management plan by November 2014, at the latest ;
- in 2013, the Group of specialists urged the Slovak authorities to fulfill the conditions, including the adoption of a management plan which meets the ED regulation requirements, otherwise the ED will be withdrawn ;
- in 2015, an CoE advisory visit mission concluded that the condition was not yet fulfilled within the proposed timeframe ; at that time, “*the management plan – was – still a draft and subject to change, which - did – not guarantee to meet all requirements of the ED. An additional evaluation of the final version of the management plan would be necessary before the official adoption in spring 2016*”<sup>1</sup>;
- lastly, in its 2016 meeting (7 March), the Group of Specialists decided to postpone to its next meeting a decision on the possible withdrawal of the EDPA awarded to Poloniny National Park (the Slovak Republic).

## CURRENT CONTEXT

A document approved by the Government Resolution of the Slovak Republic N°293 dated 7 July 2016 was provided to the Council of Europe late 2016.

This document is entitled “*Poloniny National park Management Plan for 2017-2026*”; it has been prepared under the auspices of the State Nature Conservancy of the Slovak Republic, Banska Bytrica and the Poloniny NP Administration, Stakcin.

The two experts have been asked by the Council of Europe to give their common opinion on it, on the occasion of the forthcoming meeting of the Group of specialists (8 March 2017).

## OPINION

The document here above mentioned, leads the experts to the main comments that follow.

### 1. *regarding the process of elaboration of the document*

The draft version provided as background for the advisory visit 2015 was reviewed by one of the two experts, but his comments (T-PVS/DE (2015) 14) were not considered in the final version of the management plan. As recommend by the conclusions of this advisory visit, it would have been wiser to submit the draft document to the Council of Europe for comments, prior its official adoption; it

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<sup>1</sup> T-PVS/DE (2015)14.

would have given the opportunity to the Council of Europe to react on this document and allowed the State Party to improve its structure and contents, in order to meet at best the ED regulation requirements as well as to respect the management plan international standards properly<sup>2</sup>.

## 2. regarding the structure of the document

It is not the aim of this note to evaluate the rules and prescriptions for the structure of the plan; the two experts presume that they are sufficient to make the management plan an eligible instrument for the work of the competent authorities and administrations.

Nevertheless, the document contains a very large section of basic data compared to the scope of management objectives and measures which encompass only about 10 pages of the whole document.

This document is also mostly factual and informative and it does not express clear vision and strategy for the future of the diplomed holding area.

Such document should also (1) address and detail the issues and challenges facing the diplomed area, (2) express the long-term ambition for it, and (3) contain concrete operational objectives raising up the European interest of the protected area. It should as well enlighten on how this ambition will be delivered through the range of the main management sectoral policies that can influence the values and assets of the diplomed area.

The two experts also noted that there is no section/paragraph in this document devoted to the requirements of the ED, which is even no mentioned anywhere in the text.

The document would be of better overall quality, if built on the international standards and based on guidelines such as those on management of world heritage properties<sup>3</sup> ; amongst other weaknesses, there is no development and provisions in the plan addressing very important matters like climate change and environmental services and the subject of the invasive species which is a key issue for protected areas, is only addressed as part of the forest management.

## 3. regarding the contents of the management plan

One of the main arguments for the withdrawal of the ED was the intensive commercial use of forests for timber production with a large proportion of intense logging areas and a trend increase in logging over the years, within the diplomed area.

As a large proportion of the forest in the diplomed area are still designated as “*commercial forest*” and considering the statement “*the primary function of commercial forest being the quality timber production*”<sup>4</sup>, the experts have some doubt that intensive logging will be stopped and even only decrease significantly in the future so that the natural features and processes leading to the award of the ED will be maintained and enhanced.

In addition, the management regime of the “*special purpose forest area*” which totalizes more than 93% of the whole territory of the diplomed holding area, all together with the “*commercial forest*”, does not bring more security with regard to the preservation of the European interest of the diploma holding area. This area will probably continue to be managed actively as a logging area, without any clear goal and objective reflecting the European interest and other ecological and natural assets of the PNP on the basis of which the ED was awarded to the park in 1998.

Furthermore, the management of other uses and activities performed in the area, are poorly addressed in this document, without any strategic approach ; it is not clear how the so-called “*setting of operational objectives under the ecological functional area framework*” will contribute to maintain the values of the diplomed area as well as to preserve its integrity :

- the cultural values of the area will be “*possibly*” covered by EFA 16 “*urban and suburban habitats*” ; they are limited in the document to activities on traditional handicrafts and

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<sup>2</sup> Ex. : <http://whc.unesco.org/en/series>.

<sup>3</sup>Ex. : <http://whc.unesco.org/en/managing-natural-world-heritage/>.

<sup>4</sup> P. 35 of the document.

products, as well as to horticulture (in connection with EFA 8 and 15) and do not refer to the preservation of cultural and natural landscapes which are important assets of this area ;

- there is no strategic approach of tourism which is mixed with biking and mostly addressed through the construction of infrastructures, without zoning in the plan, capacities objectives and specific rules ;
- the important environmental services provided by the area – except the water reservoir - are even not mentioned in the park contribution to the regional economic development which emerges only with the construction of new “*facilities*” in the text.

It is not clear how this plan will be funded and the **Table 14** of the document gives a broad estimation of the resource needed where it is not possible to check what will be the budget dedicated to each operational objective; the document would need a more elaborated financial and business planning description.

Finally, monitoring and evaluation are not addressed at all and a statement should be included to indicate how the plan which covers a rather long period of ten years, will be reviewed and what will be the iterative process that will be used over the cycle of this plan to do it.

## CONCLUSION

This document lacks a vision and a statement which present how the European interest of the area as well as its outstanding universal value will be preserved in the long term; there is a clear need also to elaborate further and target the operational objectives and concrete measures that will be taken to meet those objectives.

All measures are worded very general and – concerning forestry – they concentrate on the WH property which covers around 7% of the PNP (see § 3.2 amongst others). The various “objectives” under this part of the management plan are aiming to “*maintain or achieve a favourable conservation status*” without describing neither the features nor the measures that will be implemented.

Forest management for extensive logging activities will intend obviously to intervene permanently and significantly, including active management measures like plantation of commercial species, instead of enhancing and simply allowing natural succession and other natural ecological processes.

In absence of further details and clear commitments, this document gives the manager leeway for interpretation and cannot be seen as meeting the ED requirements and responding to the preservation of the values and interest of the diploma holding area.