

Strasbourg, 18 February 2016 [de05e_16.doc]

T-PVS/DE (2016) 5

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE AND NATURAL HABITATS

GROUP OF SPECIALISTS ON THE EUROPEAN DIPLOMA FOR PROTECTED AREAS

7 March 2016 Strasbourg, Palais de l'Europe, Room 11

---ooOoo---

REPORT OF THE VISIT OF THE INDEPENDENT EXPERT TO BIALOWIEZA NATIONAL PARK (POLAND) 16-18 SEPTEMBER 2015

Document prepared by Olivier Biber (Switzerland)

INTRODUCTION

Bialowieza National Park in Poland was awarded the European Diploma for Protected Areas by the Committee of Ministers of the Council of Europe in 1997 (Resolution (97)20). A set of recommendations were attached to the award. The Committee of Ministers renewed the award in 2002 (Resolution ResDIP(2002)3) again attaching a number of recommendations. During a mission in 2003 in the framework of the Bern Convention (Via Baltica) a meeting was organised on the Bialowieza Forest, where complaints from NGOs on failing conservation management were confronted with the statements of the National Park authorities, Forest Districts and their responsible departments (see documents of the secretariat to the Bern Convention at the Council of Europe). The period of validity for the Diploma expired in 2007. In accordance with the regulations, an on-the-spot appraisal took place in 2006. Based on the report of this appraisal (document PE-S-DE (2007)6) and recommendations from the Group of Specialists on the European Diploma for Protected Areas (document T-PVS/Inf (2007) 14), the Committee of Ministers decided not to renew the Diploma to Bialowieza until two conditions and eight recommendations were met.

In their report for 2014 to the Group of Specialists, the Polish government reported on progress made in fulfilling the conditions and recommendations (doc. T-PVS/DE (2014)5). As most of them had been fulfilled or were close to fulfilment, in particular the adoption of a long term Protection Plan for the Bialowieza National Park, the Group of Specialists recommended an on the spot appraisal mission to be organised in order to examine the situation for a possible renewal of the Diploma.

PROGRAMME OF THE VISIT

Wednesday 16 September

o Afternoon: arrival at Warsaw, meeting the BNP representative, transfer to Bialowieza

Thursday 17 September

- o 05.30: field excursion (bison in the wild)
- o 08.00: breakfast
- o 09.00: meeting with the Director of the BNP Park
- o 09.30: study visit in the strictly protected area
- o 12.15: lunch
- o 13.30: meeting with the national park's directorate and stakeholders (at the headquarters of the park's administration):
 - Bialowieza National Park's presentation focusing on completion of conditions and recommendations formulated by the Group of Specialists on the European Diploma in 2007
 - Presentation by the Experts of Council of Europe
 - Discussion with all the participants of the meeting: representatives of: the Bialowieza National Park, National Park "Bialowieza Forest" from Belarus, Regional Directorate of the Environmental Protection from Bialystok, Regional Directorate of the State Forests Administration in Bialystok, forestry units from Bialowieza, Browska and Hajnowka, regional authorities from Bialowieza, Hajnowka and Narewka, research institutions (Mammal Research Institute, Natural Forests Institute, Geobotanical Station all based in Bialowieza), non-governmental organisations.
- o 17.00: visit to the European Bison Breeding Centre and nature reserves in the Bialowieza Forest in the vicinity of the Park.
- o 20.00: dinner

Friday 18 September

- o 08.00: breakfast
- o 09.00: departure to Warsaw
- o 13.00: dinner in Warsaw
- o 14.00: meeting at the Ministry of the Environment

FIELD EXCURSION (BISON IN THE WILD)

During this early morning excursion to several places in the Bialowieza forest and adjacent pastures and meadows under the leadership of Mr Mateusz Szymura, we managed to watch several herds of bison, most of them with young calves. In total, we counted ca. 60 animals. To judge by the alerted behaviour of the animals when they got aware of our presence, they behaved like wild animals.

Mr Mateusz Szymura gave us valuable information on fauna and flora of the National Park and its surroundings as well as details on their management.

STUDY VISIT IN THE STRICTLY PROTECTED AREA

During this visit, we had the opportunity to have a good insight into what is the primeval forest of Bialowieza with its high floristic, faunistic and structural diversity. Mr Mateusz Szymura and Ms Renata Krzysciak-Kosinska gave us plenty of information on the functioning of this ecosystem and some threats to it, like decreasing ground water table.

MEETING WITH THE NATIONAL PARK'S DIRECTORATE AND STAKEHOLDERS (AT THE HEADQUARTERS OF THE PARK'S ADMINISTRATION)

Participants to the meeting with the national park's directorate and stakeholders at the headquarters of the park's administration:

- Grzgorz Bielecki ; Hajnowka Forest District (invited)
- Przemyslaw Bielicki; Polish Society of Bird Protection (invited)
- Adam Bohdam; Society for the Protection of All Living Beings
- Aleksander Bolbot, Bialowieza National Park
- Mikolaj Chlabicz; Browsk Forest District (invited)
- Jerzy Dackiewicz; Bialowieza National Park
- Bogdan Jaroszwicz; Geobotanical Station (invited)
- Roman Kalski; Polish Society of Bird Protection (invited)
- Malgorzata Karczewska; Bialowieza National Park
- Andrzej Karczewski; Bialowieza National Park
- Grzegorz Kasprowicz; Maire of Bialowieza Commune (invited)
- Rafal Kowalsczyk; Mammal Research Institute
- Renata Krzysciak-Kosinska; Bialowieza National Park
- Lech Magrel; Regional Directorate of the Protection of the Environment (invited)
- Rafal Paluch; Natural Forest Institute (invited)
- Lucyna Smoktunowicz; Maire of Hajnowka Commune (invited)
- Miroslaw Stepaniuk; Bialowieza National Park, Director
- Mateusz Szymura; Bialowieza National Park
- Andrzej Chrenowski; Bialowieza Forest District

- Grzegorz Piekarski; Regional Directorate of the Protection of the Environment
- Mikołaj Pawlicz; Maire of Narewka Commune
- Krzysztof Oniszczuk; Regional Directorate of State Forests in Bialystok
- Kruczyński Zenon; Landscape Protection Society
- Łukasz Grabowski; Society for the Protection of All Living Beings

The Director of the Bialowieza National Park, Mr Miroslaw Stepaniuk, opened the meeting and welcomed all participants. Mr Eladio Fernandez-Galiano informed the meeting on the aims of the on the spot appraisal.

We were informed on how and how far the conditions and recommendations have been or are being implemented.

Condition 1: draw up a peer-reviewed ten-year management plan for the National Park by the end of 2009

The Minister of the Environment has signed a long term Protection Plan for the Białowieża National Park (which has been submitted to the Council of Europe in an English version). Although it is not called a "management plan", the Protection Plan aims at achieving the maintenance of biodiversity at all levels, in particular forest ecosystems. One identified challenge is the danger of drought through lowering of the water table. NGOs in general welcome the Protection Plan. In parts of the Communes (at least), one is quite happy with the Protection Plan, but would also like to see some benefit to the Communes derived from it.

Condition 2: have all primeval forest stands and functional corridors linking the various reserves designated part of the Bialowieźa forest and afforded full protection

This condition cannot be fulfilled easily, as different authorities are responsible for different parts of the forest, but it seems that significant progress has been achieved with the acceptance of the State Forests' administration to manage forest stands in a more biodiversity friendly way and with the continued ban on cutting old trees. The biologically reasoned recommendation of leaving dead wood in the forest stands and sanitary felling are still an issue of conflict between conservationists and foresters. Furthermore, the fact that forest reserves under the Voivodship nature conservator's ruling are not being managed at least in strong collaboration with the National Park's Protection Plan also remains an unsolved problem because the management of these stands may not be performed in a biodiversity friendly way. There is hope that the Natura 2000 management plan could help solve this problem.

Recommendation 1. National Park regulations and forest management rules be revised to require districts (counties) located within the state forest and the Voivodship Nature Conservation Officer to work with National Park management, the Scientific Council and independent experts, and that public consultation be undertaken in relation to planned activities in all protected areas

Institutions involved in the management of the Białowieża Forest try to enhance the cooperation and consultation process on different levels notably by participation of managers, researchers and representatives of local authorities in scientific councils and advisory bodies.

Recommendation 2. existing forestry policy and practices be reviewed with a view to maximising biodiversity outside protected areas as well by maintaining the ban on cutting down old trees (>100 years) and significantly increasing the volume of dead wood by ceasing to market wood from sanitation felling and protected reserves

The decision of limiting timber exploitation from the Białowieża Forest managed by the State Forest administration led to a ten-year management plan for the Forest Districts of the Białowieża Forest (2013 – 2022), stating that the annual timber production cannot exceed 48,5 thousand cubic meters. In addition, the ban on cutting the trees in tree stands of over 100 years is continued. This condition is thus partly implemented, although NGOs fear that the management plan may not be

followed as already in 2014 and 2015 a significantly higher amount of timber has been harvested than the indicated annual mean. Furthermore, the way sanitary harvesting is treated is not clear. As far as the National Park is concerned, wind fallen and uprooted trees that do not fall over the roads are left in the forest for natural decomposition. During our visit of different forest stands outside the National Park together with foresters and National Park representatives, we had the strong feeling that a good cooperation between the National Park authorities and foresters has developed and that the latter are conscious that logging and harvesting can be compatible with the conservation and maintenance of biodiversity at ecosystem level. NGOs are however skeptical in this respect (see above).

Recommendation 3. Education and training activities be stepped up so as to support the redistribution of jobs, with a shift away from the forestry sector towards the conservation and sustainable eco-tourism sector, thereby increasing the number of interesting local jobs available for young people

The National Park's Education and Museum Centre – which we had the opportunity to visit and found very well-conceived and interesting – provides educational programs to about 60 - 70 thousand people annually. Main activities are such as: educational projects for schools; outdoor activities for youngsters and adults arranged due to visitors' needs or Park's educational assignments; outdoor courses and trainings for teachers; periodical lessons for local schools' pupils and students; natural science knowledge competitions, art and photography contests related to natural science and culture.

Recommendation 4. Tourist access to fully protected areas be restricted to pre-2006 levels; this means critically reviewing the use of the existing narrow-gauge railway line, including rebuilt "railway stations", in accordance with the National Park's admission capacity; kayaking and other aquatic leisure activities on the Narewka and Hwozna rivers should remain strictly prohibited

Numbers of tourists visiting the strictly protected area did not rise significantly during last years. Some fluctuations are observed but there are no reasons for applying additional regulations. No new tourist paths were created. The idea of revitalizing a railway through the forest and the national park was dropped. On the Narewka and Hwozna rivers, within the borders of BNP, kayaks and canoes are banned.

Recommendation 5. Town planning be critically reviewed with a view to preventing the disappearance (as a result of urbanisation) of areas serving as buffer zones for the Park and of historic rural landscapes and guarding against the negative impact of any increase in cross-border motor vehicle traffic within the National Park

Although we saw houses immediately adjacent to the boundary of the National Park, we were assured that works on establishing the complete buffer zone around the National Park including Białowieska and Masiewska Glades were being carried out. The administration of the Park gives negative opinions on any plans of new infrastructure in the nearest neighborhood of the Park. The current surveys do not show signs of traffic increase within the area of the Park and in its neighborhood.

Recommendation 6. Legislative decisions be taken to give Bialowieźa National Park authorities the necessary rights and resources to manage the free movement of European bison throughout the Bialowieźa forest, and that efforts be made to co-operate with a view to opening a large mammal corridor in the border fence between Poland and Belarus inside the world heritage site.

We heard clearly that the border fence issue could only be solved by the Belarusian State Party. On the other hand, the representative of the Mammal Research Institute explained that the bison on the Belarus side differ genetically from the bison on the Polish side, and that a mixing of the two populations was not welcomed.

Recommendation 7. A bilateral conservation agreement between the competent Polish and Belarus ministries be ratified by the end of 2008, confirming the necessary principles for cross-border cooperation between the Bialowieźa and Belovezhskaya Pushcha National Parks with regard to priorities for research, management, tourism and education, coupled with ecologically healthy forest

management, bearing in mind the "Forest of Hope" appeal, the conclusions of the 2000 Kamenyuki Conference and the recommendations of the UNESCO World Heritage Committee

An agreement between the Governments of Poland and Belarus concerning environmental issues was signed in Białowieza, on 12 September 2009. It covers different aspects of cooperation between both countries. Furthermore, two agreements between National Park and Forest authorities of Bialowieza Forest and the Director of the National Park *Bialowieza Forest' based in Belarus regarding the preparation and implementation of the Management Plan for the World Heritage Site Bialowieza Forest and the establishment of a Steering Committee. Almost the whole Polish part of the Białowieża Forest is included within the boundaries of the enlarged World Heritage Site.

Recommendation 8. Invites the Polish authorities to keep the competent Committee informed of subsequent developments

The Group of Specialists on the European Diploma for Protected Areas has always been and continues to be informed.

VISIT TO THE EUROPEAN BISON BREEDING CENTRE AND NATURE RESERVES IN THE BIALOWIEZA FOREST IN THE VICINITY OF THE PARK

After the hearing, later in the afternoon, we visited several forest stands of different types outside the National Park as well as the Bison Breeding Center (Jerzy Dackiewicz, Michał Krzysiak). Listening to the representatives of the Forest administration (Krzysztof Oniszczuk, Andrzej Chrenowski), we received valuable illustrative information and explanations on forest management, harvesting and dealing with the bark beetle; we were impressed by the willingness of foresters to take into account the needs from the point of view of biodiversity, primeval forest and landscape conservation.

MEETING AT THE MINISTRY OF THE ENVIRONMENT

Participants to the meeting with the Ministry of the Environment:

- Mr Wojciech Hurkała
- Mr Zygmunt Krzemiński
- Ms Anna Żornaczuk-Łuba
- Mr Tomasz Pucek
- Mr Łukasz Rejt
- Ms Marta Żemieniuk
- Mr Mateusz Szymura
- Ms Renata Krzyściak-Kosińska

We had the opportunity of providing a summary of and feedback from our visit to the Bialowieza Forest. We particularly insisted on the fact that we were confident that State Forest and National Park authorities could cooperate in the view of preserving the Bialowieza Forest in its entirety for future generations.

CONCLUDING REMARKS

The substantial first condition set for the renewal of the Diploma, namely the adoption of a long-term management plan, has been quasi fulfilled with the adoption of the Protection Plan.

The second condition, namely to achieve full protection to all parts of the primeval forest, faces a number of difficulties, one being that parts of the forest are managed under different administration entities and another being that an extension of the National Park faces the veto of the Communes.

Recommendations 3, 4, 5 and 8 have been implemented fully or at least largely. There is significant progress in implementing recommendation 1, 2 and 7. Recommendation 6 regarding the

free movements of bison across the border with Belarus is not fulfilled. Its fulfilment is bound to political reasons on one hand and to biological reasons on the other hand.

Particular difficulties identified:

- The many different boundaries: National Park (NP), reserves (at least partly strictly protected) outside the NP, old growth stands and other forestry categories, World Heritage site boundaries, Natura 2000 site boundaries;
- Different administrative levels with their own structures, competences and dependencies like Ministry for Environment, State Forest Department, communities (which have a veto position with regard to the enlargement of the NP);
- Different motivations for logging like commercial, sanitary and salvage harvesting.

Based on all the above-mentioned assessments, considerations and reflexions, we recommend the following set of conditions and recommendations to be attached to the renewal of the European Diploma for Protected Areas of the Council of Europe.

One very important motivation for recommending the renewal of the Diploma is the vivid impression we gained during the discussions and our field visits that there is a basis and a will for cooperation and collaboration between the biodiversity conservation and the forestry sides. At least this was what we experienced at the time of our visit in September 2015. We very much hope that this spirit is still prevailing and hopefully increasing at the time being in March 2016 and that it will continue to do so in the future.

In order to better understand the formulation of our recommendations, we attach in the Annex a textual part cut out of the report from the expert Eckhart Kuijken following his on the spot appraisal in 2006.

CONDITIONS AND RECOMMENDATIONS TO BE ATTACHED TO THE SUGGESTED RENEWAL OF THE EDPA

Conditions

- 1. Draw up a peer-reviewed 20-year management plan for the National Park by the end of 2017 in coordination with the planned Natura 2000 management plan for the whole area of the Bialowieza forest;
- 2. Continue the close cooperation between the forest and conservation authorities in view of achieving a coherent and coordinated management of the whole forest area, which will permit maintenance and improvement of the ecological characteristics of the Bialowieza forest including in particular; present and future old growth stands, which shall be excluded from harvesting, including salvage logging and sanitary felling;
- 3. Wildlife, including in particular the bison population of the Bialowieza forest, but also populations of other larger wide ranging animals like wolves, is managed by the Bialowieza National Park.

Recommendations

- 1. The management of the whole Natura 2000 zone should focus on forest conservation;
- 2. Existing forestry policy and practices be reviewed with a view to maximising biodiversity outside protected areas as well as by maintaining the ban on cutting down old trees (more than 100 years old) and significantly increasing the volume of dead wood by ceasing to market wood from sanitation felling and protected reserves; that all data with regard to the characteristics of trees felled within the Bialowieźa forest complex (species, age, amount of sanitation felling and commercial exploitation) are communicated to the Council of Europe every year and analysed, in order to improve conservation measures;
- 3. Consider proposing the whole area of Natura 2000 as a European Diploma area, where the National Park and the old-growth stands would receive a high level of protection and the rest

of the forest area and the adjacent pastures and meadows would play the role of a large buffer zone including functional corridors between the National Park and nature reserves outside the National Park, as this would permit a coherent management of the whole area;

- 4. Town planning be critically reviewed with a view to preventing the fragmentation and disappearance of buffer zones;
- 5. Tourist access to fully protected areas be kept under control; kayaking and other aquatic leisure activities on the Narewka and Hwoźna rivers should remain strictly prohibited;
- 6. Education and training activities be stepped up further so as to support the redistribution of jobs, with a shift away from the forestry sector towards the conservation and sustainable ecotourism sector, thereby increasing the number of interesting local jobs for young people;
- 7. Seek contacts with respective Belarus authorities with the aim of exploring ways and means to (a) avoid further depletion of the water table thus ensuring the protection of the forest from drought; (b) allow animal dispersion and migration across the border; and (c) improve cooperation in the conservation, science and tourism sectors.

THANKS

We sincerely thank the director of the National Park, Mr Miroslaw Stepaniuk, and his team, in particular Mr Mateusz Szymura and Ms Renata Krzysciak-Kosinska for the perfect organisation of our visit and the different meetings with experts, stakeholders from forestry districts, Communes and NGO's and their great help and generous hospitality.

Annex 1

The Bialowieza Forest (BF)	143 000 ha
Polish part of the BF	63 200 ha
The Bialowieza National Park (BNP)	10 517 ha (enlarged by Decree in 1996)
	4 747 ha strictly protected (now 6059,27 ha (57,6% NP area) (no activities) (1)
	4 104,63 ha (39% NP area) included in BNP in 1996: 'active protection' $(^2)$
World Heritage Site:	Property: 59577 Ha, Buffer zone: 35835 Ha (3)
State Forests	52 700 ha (= 'promotional forest complex' in 3 forest districts)
including	12 012 ha 'nature reserves' (4)
part of 12 012 ha	8 582 ha has 'Natural Forests of the BF"status (2003)
	2 357 ha protective zones for protected animals
Biosphere reserve (enlarged in 2005) c	a. 92 000 ha
buffer zone of the park in state forest	3 600 ha (since Decree of 1996) (⁵)
forests having almost natural character	2 800 ha

Table 1 summarises the most recent data received from the Ministry concerning areas with different status and management regimes of Bialowieza Forest.

- (¹) it is planned to enlarge the strict protected zone with 1000 ha adjacent to the Hwozna River but as long as management plan of the NP is not in force, zoning is regulated by year-to-year 'plans of the conservation activities'. The extent of the enlargement may be changed on the annual basis.
- (2) in the actively protected part there are some sanitary loggings along the border with State Forest; also some management cuttings in areas most changed by forestry practice before inclusion in the BNP.
- (³) since 1979, enlarged 1992; apart from the 4747 ha strict protected area including the Palace Park and the Bison Breeding Centre.
- (4) 3 460 ha until 2002; within the area administered by the State Forests: on 12 041 ha the Nature Conservation Law is implemented under jurisdiction of the Podlasie voivodship nature conservator, while on the remaining area forest management is carried out according to the regulations of Forestry Law.

These reserve areas are managed according to Forestry Law and forestry practice; conservation plans are still to be prepared, not to mention implemented; sanitary logging occurs including removal of the wood (except for 2 small strict reserves) and the management is oriented on changing tree species composition.

(5) there is no bufferzone N of Bialowieza village, as well as S of Masiewo village because of private ownership and agriculture; spatial planning instruments are too weak to improve this situation.

In the State Forest the status of bufferzones is too weak to fully function against fragmentation of the most valuable core areas of ancient woods.

COMMENTS:

It is still not clear what area of BF is used for pure or mixed economic functions. Only the old core area of strict reserve (4747 ha) has no management activities (only some needs to maintain visitors trails etc.). This means that about 82% of the Bialowieza Forest complex is still open for forestry.

In most of the other nature reserves, as well as in part of the National Park out of the strictly protected area, there is 'active management': here tree cutting is said not aiming economic profit but rebuilding the tree stands or fighting against diseases (bark beetle). Anyway, following sanitary cuttings most wood is sold as timber afterwards. In view of ecological balances and processes the volume of dead wood in the forest is of crucial value. Removal and selling of trees cut after bark beetle outbreak or after cleaning up storm 'damage' is not compatible with conservation status. Only when this 'profit' should be banned, the motivation for cutting activities in protected zones will decrease.

Spontaneous regeneration of woodland habitats even with actual grazing by large herbivores needs to be given priority (strict protection). However 'active protection' is pretended to be implemented according the main conservation goals, taking into account biocenoses and using/respecting natural succession processes. There are indeed limitations in cutting old trees of >100 years (1998 moratorium) but control of logged wood is difficult. In the Bialowieza complex the number of 'monumental trees' is estimated above 15 000; but only less than 2000 are declared 'nature monument' in the area managed by the State Forest.

The Nature Conservation Law covers all nature reserves but only indicates general regulations with many exceptions; this law does not sufficiently specify constraints to forestry management practices. Legally, the 52 700 ha of State Forest are only 'promotional forest complex' without real protection. In practice, almost the whole area of Bialowieza Forest is under normal forestry regime, except for about 6000 ha strict reserves, including the 4747 (5726) ha of the National Park mentioned in the table. In the other reserve areas some limitations exist as to the justification of cuttings: only 'sanitary clearing' but in fact more than 90 % of the logged wood is being removed from the reserves and sold out; also reshaping tree stands is realised in many reserve areas by removing planted trees that are not belonging to autonomous regionally specific species.

The enlargement of the National Park to the entire Bialowieza Forest was subject of a draft Decree in February 2000 but no binding approval followed; forestry interests and socio economic conditions of the local communities did slow down the process. A new initiative in 2002 is still not finalised as a result of legal and administrative changes.

The strictly protected reserve is characterised by a significantly higher volume of dead wood and an impressive number of monumental trees compared to other parts of the Bialowieza Forest. However, this strict reserve only represent about 10% of the total complex. The smaller reserve areas within the State Forest are too much isolated from the core area and therefore need to be connected at least by an integrated bufferzone with more natural management and less forestry production. The campaign to further ban all cutting of old stands (moratorium issued in 1998) illustrates the needs to increase and restore overall nature values in the Bialowieza Forest.

Local patches of bark beetle infection in the recently added buffer zones were observed; pheromone traps are placed to reduce population density of Ips typographus. Foresters blame conservationists not to fully support their fight against this disease, which is believed to occur most in the neighbourhood of the protected areas and the Belarusian border. The ecological needs of this measure is to be questioned; some scientific papers studied the effects of removing infected wood on the life cycle of the bark beetle itself (dependent on the season, this 'clearance' can even stimulate further beetle increase). Clear relations between the occurrence of outbreaks and changes in hydrology with lowering water tables exist (spruce becoming more vulnerable as a result of drought, caused by large scale reclamations of marshland in Belarus). Even the economic losses by bark beetle outbreaks seem to be rather locally and patchy. In the new bufferzone (400 ha taken out of exploitation at the NW border of the strict reserve) spontaneous regeneration of the forest takes place. Scientific papers show significant relations between the volume of dead wood and population levels of rare forest bird (woodpeckers a.o.) and conclude that removal of dead trees has very negative effect (see Wesolowski T., Czeszczewik D., Rowinski P. 2005. Effects of forest management on Three-toed Woodpecker Picoides tridactylus distribution in the Białowieża Forest (NE Poland): conservation implications. Acta Ornithol. 40: 53-60.; Czeszczewik, D. & Walankiewicz, W. 2006. Logging affects the whitebacked woodpecker *Dendrocopos leucotos* distribution in the Bialowieza Forest. Ann. Zool. Fennici 43: 221–227).

The nature reserves outside the limits of the National Park are under jurisdiction of the *Voivodship nature conservator*, who is employed by the regional government (Podlasie) in Bialystok. State Forests are appointed by this conservator to manage and take care of the reserves in Bialowieza Forest. Foresters are not consulting the National Park authority or Scientific Council about their plans, because the area is out of National Park jurisdiction and there are no laws in Polish juridical system which oblige them to do so.

Documents have been received with evidence of active logging in the reserve areas outside the National Parks, based on permissions of the *Voivodship nature conservator* (883 old trees within 6 weeks in one reserve). No sound arguments nor controls on volumes of cuttings are available; this leads to a liberty for extracting trees from the nature reserves, as the specific commission consulted by the conservator is mainly composed by foresters selected from the economic sector; consultation with autonomous representatives from conservation administrations must create more balanced decisions.