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AND NATURAL HABITATS

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**POSITION PAPER OF POLAND ON
AGENDA ITEM 4.6.2**

*Document prepared
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Polish position regarding the Report and decision of the Group of Specialists on the European Diploma for Protected Areas of 8 March 2017

Doc. T-PVS/DE (2017)14, dated on 4 April 2017 – “Group of Specialists on the European Diploma for Protected Areas - Meeting report”

Poland would like to express appreciation to the Group of Specialists for taking on board the item of Białowieża National Park. Nevertheless, Poland has got general reservations, as well substantial as procedural ones, on the position of the Group of Specialists expressed in the Report of 8 March 2017 regarding the proposal not to renew the European Diploma for the Białowieża National Park. In Poland's opinion, under existing regulations and procedures (Resolutions 65/6, 98/29 and CM/ResDip(2008)1) applicable to the European Diploma for Protected Areas, which have not been amended to date, there are no sufficient justification to make any claims regarding inability to renew the European Diploma for the Białowieża National Park in 2017 and thereafter. This position is supported by the provisions of Article 9 Paragraph 7 of the regulation in force, and in particular Point 5a according to which in case when Diploma is not to be renewed, respective procedure should be initiated against the authority directly responsible for the respective protected area at the level of the Committee of Ministers and at the government level. However, in case of Poland such procedure has not been launched against Poland to date. It must be clearly emphasised that since the awarding the Diploma in 1997 to the date, the appropriate management of the area has been reported annually, with the exception of the period when the Diploma was suspended in 2007. A relevant report on the condition of the area and actions taken so far in relation to its functioning will be submitted also this year. Over the years since the awarding the European Diploma, all requirements and recommendations set out in successive reports from the experts visits have been taken into account to the greatest extent possible. In recent years, Poland has submitted a number of substantial clarifications to the comments and recommendations made by the experts. Poland paid a special attention to the latest independent expert report in 2015. Indeed, the report submitted after the approval the long-term protection management plan for the Białowieża National Park by the Minister for the Environment in 2014, has offered for Poland justified expectations for the renewal of the European Diploma.

Therefore, Poland cannot accept the position submitted in the report of 8 March 2017 regarding the alleged intensification of logging within the area covered by the Diploma starting in March 2017. The information provided by a coalition of Polish NGOs cannot be used as the only base for reliably opinions and judgements in the case. No forest management practices are being carried out within the area covered by the European Diploma, as has been mentioned in the *Meeting Report*. Such practices are prohibited under the approved long-term protection management plan for the Białowieża National Park. There is observed a clear misunderstanding among experts regarding the area of the Białowieża National Park and the UNESCO Białowieża Forest World Heritage Site, which spans over the entire Białowieża Forest (not only the Białowieża National Park). In this context, it must be strongly emphasised that the forest management practice mentioned above is in fact being carried out, but outside the area of the Białowieża National Park (i.e. outside the site honoured with the Diploma), as noted in the position of the Group of Specialists, under a separate regulation - the 2012-2021 Government Forest Management Plan. In Poland's opinion, this fact cannot be equivalent to accepting the assumption about harmful effect of those works on the European Diploma site in question. At the moment, there are no scientific data or specialist studies available that could support this assumption. Furthermore, it must be noted here that forest management practices have been carried out in Białowieża forest districts, but outside the Białowieża National Park, for decades, also when the Białowieża National Park was awarded the European Diploma for Protected Areas. It is of extreme importance to notice that logging and forest management practices were by far more intensive in the Białowieża Forest in the 1990s than they are now. For example, the 1992-2001 harvesting plan for local forest districts assumed that a total of 1,382,465 m³ of timber would be harvested in that period, whereas the figure stands at only 594,509 m³ in 2012-2021.

The Polish side wishes to conclude that in light of the actual situation and activities carried out in Białowieża Forest, the renewal the European Diploma for the Białowieża National Park is still justified, according to the applicable law, particularly in accordance with Resolution

CM/ResDip(2008)1. Therefore, Poland is looking forward to reconsideration of the position proposed by the Group of Specialists.