



Event Report

EPPA

**Regional Workshop on Exchange of information and best practices
on managing illegal timber**

19 – 20 February 2020, Skopje



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- Annex 2: List of Participants (provided as a separate document)
- Annex 3: Presentations (provided as a separate document)



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1 Introduction

The regional workshop

The regional workshop on “Exchange of information and best practices on managing illegal timber” took place on 19-20 February 2020, in Skopje, North Macedonia. The workshop was organized in cooperation with TAIEX, and under the EPPA project work programme activity 5.2.3 “Exchange of information and best practices on managing illegal timber”, and activity 5.2.5 “Exchange of information/ best practices between the EU and beneficiaries’ private sector”.

The participants of the workshop came from the relevant authorities of the EPPA beneficiaries. They represented the relevant Ministries (Environment, Agriculture, Forestry and Rural Development, Interior) and other institutions associated with forest governance (forest management companies, universities, municipalities, customs administration, state inspectorates). Civil society was also represented by the National Association of Private Forest Owners of North Macedonia (NGO). Details are available in the list of participants.

The speakers represented a wide range of EU Member States’ experience. There were experts from the competent authorities from Slovenia, Hungary Bulgaria and Croatia. One speaker represented Austria’s Criminal Intelligence Service, from the unit dealing with environmental crimes. In addition, the programme also included a speaker from an international organization active in forestry projects in the Western Balkans, the Food and Agriculture Organization of the United Nations, and a representative from the non-profit organization *Connecting Natural Values and People* (CNVP), which works on forest governance initiatives in the region. Details are available in the agenda.

The presentations are available in both the TAIEX website and in the EPPA project website.

The event was reported by the participants and speakers in institutional websites and social media, giving it a high profile. For example:

- In the Hungarian EUTR authority website (National Food Chain Safety Authority):
 - <https://portal.nebih.gov.hu/web/guest/-/a-nebih-is-reszt-vett-az-eu-tagjelolt-orszagok-reszere-szervezett-eutr-egyezetteten>
- In the Facebook page of the Ministry of Agriculture, Forest and Water Economy, North Macedonia:
 - <https://www.facebook.com/1520442714679949/posts/2802296179827923/?app=fbl>
 - <https://www.facebook.com/299435803565364/posts/1482103598631906/?app=fbl>
- In the Facebook page of Mr. Jani Makraduli, Deputy Minister of Environment and Physical Planning, North Macedonia:
 - <https://www.facebook.com/1336696619/posts/10216282613121434/?app=fbl>
- In the Facebook page of Mr. Ivan Karic, State Secretary in the Ministry of Environmental Protection, Serbia:
 - <https://www.facebook.com/537377263/posts/10157948671127264/?app=fbl>

Forest Law Enforcement, Governance and Trade Regulation (FLEGT)

The European Union’s policy to fight illegal logging and associated trade was defined back in 2003 with the Forest Law Enforcement Governance and Trade (FLEGT) Action Plan. The key regions and countries targeted in the FLEGT Action Plan, which together contain nearly 60% of the world’s forest and supply a large proportion of internationally traded timber, are Central Africa, Russia, Tropical South America and Southeast Asia. The FLEGT Action Plan covers both supply and demand side measures to address illegal logging, and was endorsed by the EU Council of Ministers in November 2003.

The FLEGT Action Plan has led to two key pieces of legislation:

- FLEGT Regulation adopted in 2005, allowing for the control of the entry of timber to the EU from countries entering into bilateral FLEGT Voluntary Partnership Agreements (VPA) with the EU;
- EU Timber Regulation, proposed by the Commission in October 2008 and adopted by the European Parliament and by the Council in October 2010, as an overarching measure to prohibit placing of illegal timber and timber products on the internal market.



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Once agreed, the VPAs include commitments and action from both parties to halt trade in illegal timber, notably with a license scheme at the partner country and the issuance of FLEGT licenses that certify the legality of timber exported to the EU. To issue FLEGT licenses, a VPA partner country must implement a timber legality assurance system (TLAS) and other measures specified in the VPA. When fully operational a TLAS is both robust and credible, as it includes effective supply chain controls, mechanisms for verifying compliance and is subject to independent audits. A VPA TLAS is built around a practical definition of legality that has been agreed through participatory processes involving stakeholders from government, the private sector and civil society. The VPA also promotes better enforcement of forest law and an inclusive approach involving civil society and the private sector.

The European Commission has been given a mandate from the Council of Ministers of the EU to conduct negotiations in view of concluding such FLEGT VPAs. While the European Commission is leading in these negotiations, EU Member States play a key role in supporting the negotiations and implementation. The first VPA to be signed was with Ghana, followed by the Republic of Congo, Cameroon, Indonesia, the Central African Republic, Liberia and Vietnam. The EU has concluded negotiations and initiated the VPA with Honduras and Guyana.

Negotiations are ongoing with Côte d'Ivoire, Democratic Republic of the Congo, Gabon, Laos, Malaysia, Thailand. Indonesia is the first country in the world that started issuing FLEGT Licenses on 15 November 2016. FLEGT Licenses are issued by Licensing Authorities, which are independent organisations registered with the Ministry of Environment and Forestry of the provider country.

The Timber Regulation (EUTR)

Regulation (EU) No 995/2010 of the European Parliament and of the Council of 20 October 2010 laying down the obligations of operators who place timber and timber products on the market – also known as the EU Timber Regulation or EUTR counters the trade in illegally harvested timber and timber products through three key obligations:

- It prohibits the placing on the EU market for the first time of illegally harvested timber and products derived from such timber
- It requires EU traders who place timber products on the EU market for the first time to exercise due diligence
- Keep records of their suppliers and customers

The Regulation covers a broad range of timber products including solid wood products, flooring, plywood, pulp and paper. Not included are recycled products, as well as printed papers such as books, magazines and newspapers. The Regulation applies to both imported and domestically produced timber and timber products. Timber and timber products covered by valid FLEGT or CITES licenses are considered to comply with the requirements of the Regulation.

The core of the 'due diligence' notion in the EUTR is that operators undertake a risk management exercise to minimise the risk of placing illegally harvested timber, or timber products containing illegally harvested timber, on the EU market. The three key elements of the "due diligence system" are information, risk assessment, and risk mitigation.

The Regulation provides for "Monitoring organisations" to be recognised by the European Commission. These organisations which are private entities, provide EU operators with operational due diligence systems. Operators can thus develop their own system or use one developed by a monitoring organisation.

To ensure cooperation between Member States Competent Authorities and with the European Commission, in order to ensure compliance with the EU Timber Regulation (in the spirit of Article 12 of the EUTR), and to assist the Commission in ensuring uniform implementation of the EUTR and FLEGT Regulation across the European Union, the Commission has set up an Expert Group on the EU Timber Regulation and the Forest Law Enforcement, Governance and Trade (FLEGT) Regulation. The Expert Group meets four to five times per year. Regarding the EUTR, it is tasked to exchange information, between the Competent Authorities and with the Commission, on shortcomings detected through the



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checks referred to in Articles 8(4) and 10(1) of the EUTR and on the types of penalties imposed in accordance with Article 19 of the EUTR, identifying best practices and sharing lessons learnt.

2 Objectives of the training and expected results

The aim of the workshop was to provide advice and guidance on the process of alignment with the EU Timber Regulation and the Forest Law Enforcement, Governance and Trade Regulation in the Western Balkans.

3 Highlights from the workshop

3.1 Introduction to the workshop

Mr. Vlatko Trepeski of the Ministry of Environment and Physical Planning of North Macedonia chaired the workshop. He gave a brief introduction to the scope of the workshop and the EPPA project.

Mr. Trajan Dimovski, Minister of Agriculture, Forest and Water Economy, welcomed the participants on behalf of the host country. Mr. Trajan Dimovski remembered the importance of the Ministry of Agriculture, Forest and Water Economy in transposing and achieving the goals of the EU Environmental Acquis. In relation to the workshop topic, he brought to attention the IPA 2019 project, worth 1.3 ME, to strengthen forest management in North Macedonia. The project is expected to start in the second half of 2020. It will support the upgrade of the legal framework with a view to preserve forests in the context of EU accession. The Ministry sees as essential the synchronization of environmental and rural development policies when Chapter 27 negotiations are opened.

The reduction of forest area in North Macedonia is a serious problem, with impact on climate adaptation, public health, biodiversity, potential for floods, etc. The reduction is driven by illegal logging. Tackling the problem will require cooperation by all stakeholders, including transboundary cooperation. The EPPA project, the aforementioned IPA project, and other initiatives, will provide a driver for reforms and better management.

Mr. Trajan Dimovski concluded his welcome by thanking the EU for its financial support and called all stakeholders to work together.

Mr. Jani Makraduli, Deputy Minister of Environment and Physical Planning also showed gratitude for EU's support to the current workshop. In his view, it is an opportunity to exchange best practices in forest management and timber control. Examples of successful cooperation like this are drivers of reform. Mr. Jani Makraduli stressed that the Ministry of Environment and Physical Planning is the national authority for environmental policy. The Ministry endeavours to have a participatory approach and much progress has been made in North Macedonia, even if the achievements are sometimes undervalued.

With the potential start of negotiations with the EU soon, and the rise in political priority of environmental policies, Mr. Jani Makraduli stated how his Ministry and the Ministry of Agriculture, Forest and Water Economy are already engaged in interinstitutional coordination, as shown by the presence of two high ranking members of each Ministry in the workshop.

EPPA is considered an important tool to promote the EU Green Deal. North Macedonia expects to be part of the new policy framework, in which forest are a key component to achieve goals in biodiversity, public health and ecosystem services.

In North Macedonia he noted the State Inspectorate needs further strengthening to combat illegal logging. However, steps to increase the Inspectorate's capacity must also be accompanied by interinstitutional cooperation. Illegal logging stems for structural causes such as low living standards, lack of governance, and black markets. It requires a holistic approach. In this regard, enforcement capabilities should be followed with other measures to clamp down on the black market and a change in domestic heating technologies (which are not only an illegal logging driver, but also a significant source of air pollution).

Mr. Jani Makraduli concluded with a call to further cooperation among the relevant stakeholders.

Mr. Konstantinos Soupilas, from the EU Delegation in North Macedonia, followed the previous interventions by reflecting on the multidimensionality of illegal logging: it is a social, economic and



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political problem. Illegal logging causes lost revenues to legal players, drives deforestation and worsens climate change impacts, leads to the loss of biodiversity, it is at the source of conflicts over land and its resources, feeds corruption and, in extreme cases, it can even lead to armed conflict.

It is important for the EU that a level playing field is created and maintained. Any type of illegal activity is a serious deterrent for that goal.

He then gave a brief overview of the EU's response to illegal logging. With the 2003 FLEGT Action Plan, the EU targets 60% of the world's forested areas of economic relevance through supply and demand control mechanisms. The first one is the FLEGT regulation of 2005 and the second the EUTR of 2013. In parallel, Mr. Konstantinos Soupilas stressed the importance of also working on mechanisms that can increase demand for legal timber, such as green procurement. Some EU MS have already adopted such policies, for instance, Belgium, France, Germany, among others. The private sector should also make volunteer commitments to eliminate illegal timber from its supply chain.

Mr. Konstantinos Soupilas closed his intervention by mentioning the EU's efforts to fund capacity building, including support to NGOs and the private sector. He also mentioned that the IPA 2019 Forest Project will include a pilot scheme to create a voluntary certification for timber and timber products in North Macedonia.

Mr. Mihail Dimovski, EPPA Team Leader, thanked both Ministries for their commitment with forest governance and their support to EPPA project in that field. He also thanked all the participating experts and audience for their presence and contributions, noting that it is in these small steps that cooperation is built. He then gave a brief overview of the EPPA project, which covers significant parts of Chapter 27 negotiation topics (water, air, waste, nature and biodiversity, marine environments). He cautioned that the way ahead in negotiations will be challenging, requiring public administrations to be prepared and the need to rely on cooperation to achieve good results.

3.2 Slovenian experience in implementation of EUTR – Overview, enforcement, challenges, examples of good practices

Mr. Robert Režonja, from the Slovenian Ministry of Agriculture, Forestry and Food (EUTR competent authority) gave a presentation on the implementation of EUTR in Slovenia. He started by laying out the EUTR obligations for the MS: Article 7 (Competent authorities), Article 19 (Penalties) and Article 20 (Reporting).

For the implementation of the EU Timber Regulation Slovenia has amended the national Forest Act. Based on that amendment the competent authorities are the Ministry responsible for forestry, Forestry inspection, and Customs Administration (meanwhile Customs has been incorporated into the Financial Administration).

Based on risk assessment, the Financial Administration carries out between 15 to 20 checks on operators (companies) annually. The Annual programme for checks is based on the data of the Customs Information System (operators - trading with third countries) and risk criteria. The risk criteria includes the value of the timber and timber products (Annex 1 of the Regulation (EU) No. 995/2010) in customs procedures (import, export), type of timber products, country of origin, level of corruption in the country of timber products (origin) using the CPI (Corruption perception index).

The Forestry Inspection carries out approximately 200 checks on operators (forest owners) per year. The Annual programme for checks is made based on data of risk criteria like level of risk, size of forest property, substantiated concerns.

Mr. Robert Režonja then gave two concrete examples of EUTR enforcement involving transboundary cooperation in the region (EUTR Article 12 - Cooperation).

The first case was an import from timber from Bosnia and Herzegovina, in which, during the first visit of the Customs Administration, the Slovenian company displayed only a statement of compliance with EUTR. The document provided did not meet the EUTR requirements of a due diligence system which requires companies to show complete information on the supply and supplier, the existence of risk assessment procedures and risk mitigation procedures.



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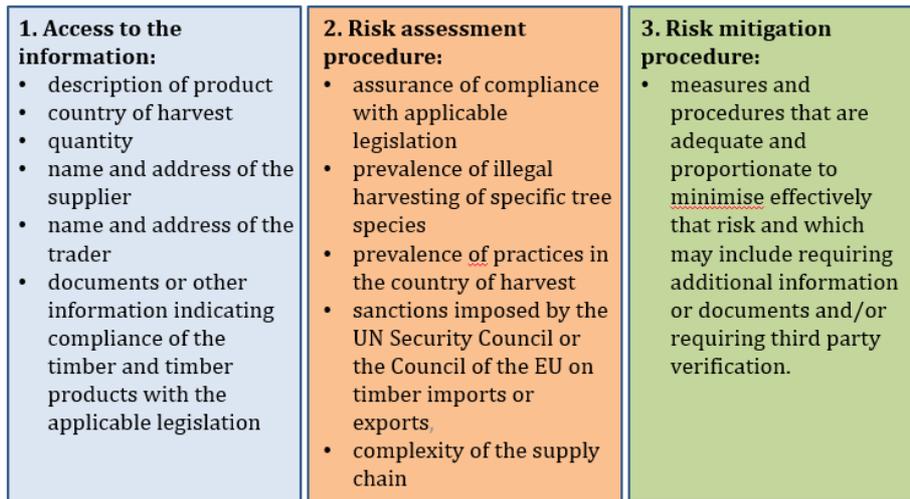


Figure 1 - The pillars of a due diligence system (EUTR)

Given the lack of proper documentation, the Slovenian company had to collect additional documentation. However, the Slovenian company had no knowledge of the relevant legislation in Bosnia and Herzegovina, some documents were scanned and therefore badly readable, some documents were not related with the shipment and the Slovenian custom authorities have no knowledge regarding relevant legislations in different administrative units within Bosnia and Herzegovina.

Faced with this situation, the Slovenian competent authority request for assistance BIH authority and with their help successfully completed the check of the Slovenian company.

The second case involved the import of timber from Serbia. During the first visit of the Customs Administration the company displayed some documentation regarding timber products. The Financial Administration found that the timber originated from a national park. Once again neither the Slovenian company nor the customs authorities had no knowledge of relevant legislation in national parks in Serbia. The Slovenian competent authority requested assistance from the Serbia authority and, with their help, successfully completed the check on the Slovenian company, which could then collect all necessary documentation to fulfil the due diligence requirement.

The Slovenian experience implementing EUTR shows that, when gaps are detected, a possible winning approach is as follows:

- strengthen cooperation between the EU and non-EU companies considering EUTR
- strengthen cooperation between EU and non- EU competent authorities in field of the forestry, the customs and other relevant sectors, for instance:
 - Taix project ETT IND /STUD 58552 organised in co-operation with Ministry of Agriculture, Forestry and Food of the Republic of Slovenia, Ljubljana, 11-13. Mart 2015 “Study Visit on requirements of the EU Timber Regulation“- beneficiary Serbia
 - Taix project ETT IND /STUD 60024 organised in co-operation with ministry of Agriculture, Forestry and Food of the Republic of Slovenia, Ljubljana, 25-27. August 2015. “Study Visit on the adoption of the EU regulation regarding trade in timber“- beneficiary - Montenegro
- exchange information
- training/assistance for companies (operators) regarding the implementation of the EUTR
- training/assistance for competent authorities (EU and non-EU) regarding the implementation of the EUTR



3.3 Bulgarian experiences in implementation of EUTR - Challenges with checks of importers of regulated wood products from EU enlargement countries and EU non-member states

Mr. Rosen Raychev, from the Executive Forest Agency – Sofia, presented the Bulgarian experience with the EUTR. The Executive Forest Agency is under the Ministry of Agriculture, Food and Forestry. The Agency supervises, in turn, 16 regional forest directorates. Bulgaria has a total area of forests of 4 257 200 ha (72.5% state forests, 13.1% municipal forests, 11.5% private forests, 2.7% agricultural land that acquired forest characteristics). Both the forest area and the wood stock have been growing since the 1960s.

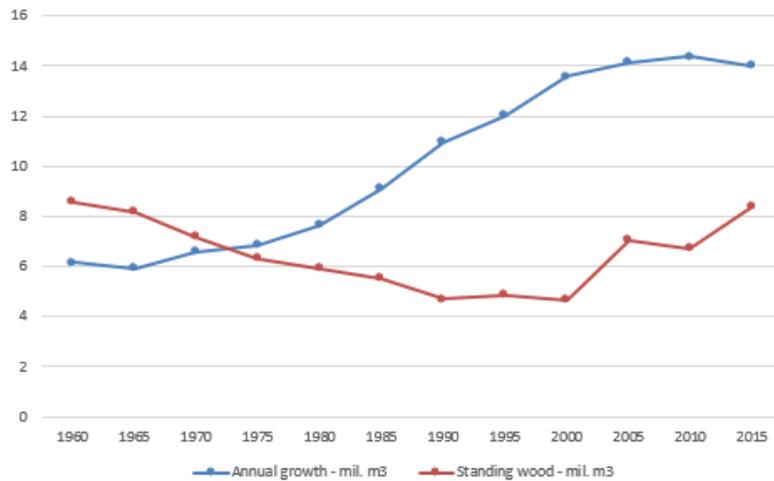


Figure 2 - Annual growth and standing timber

Bulgaria started EUTR preparations in 2010 participating in the EC working groups for discussion and adoption of the regulation. In 2012, Bulgaria reformed its Forest Act to reflect the EUTR, and in 2013 it launched information activities¹. At the same time, the country started preparing EUTR implementation by identifying the operators: a) Companies/persons who have bought standing timber in Bulgaria, b) Companies/persons, owners of forests or forests under their management, selling wood in Bulgaria for the first time, and c) importers of wood and wood products listed in the Annex to the EUTR. In addition, concrete instructions for implementing EUTR was sent to the Regional Forest Directorates, the country created a regional working group with the Regional Forest Directorates (RFD) and started a register of the checks carried out under EUTR.

A further legislative alignment was made in 2014 providing Customs information, and a procedure for the provision of timber and timber products which have been removed for breaches of the Penalties for infringements of the Regulation (EU) No 995/2010. Further work that year saw the organization of trainings, preparation of checklists, the EUTR was included in the annual RFD verification programmes, exchange of information, access to customs information, and analysis of the amount of timber harvested and placed on the market from the country, and imports of timber and timber products within the scope of the Regulation.

In terms of the control structures, Bulgaria has forest guards for the protection of forest areas of 1500 to 2000 ha. There are mobile guarding teams (180 employees in State Forest Companies). Each area with a logging permit is observed by an assigned person who is responsible for compliance with the rules for logging (in case established irregularities an act for establishing administrative violation and withdrawal of the right to practice for a period of 1-2 years). There are 400 forest inspectors in the EFA and RFD who control the implementation of the law and regulations, assisted by experts.

¹ Letters to forest companies, municipal associations, branch organizations, non-governmental organizations and cooperatives, information in central and local media, providing detailed information of the Regulation on the EFA website, including in different languages, information brochures, targeted participation in meetings of branch organizations, information campaigns for the employees of EFA and RFD, promoting good practices.



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The controls focus on due diligence systems and imports through an agreement with the Customs Agency. There are periodic checks of imported timber and timber products, analysis of species and timber quantities and forwarding of data to the RFD.

Within borders, the Executive Forest Agency and the regional directorates perform joint checks. They are inspections in large retail chains in Bulgaria, and inspections on MDF and paper importers. The checks are also used to increase the capacity of RDF and EFA experts who will carry out further checks.

Bulgaria has implemented an electronic transport ticket for timber shipments. The ticket contains the time of its issuing, GPS coordinates of the transport, tree species and timber quantity. All vehicles transporting timber must be equipped with GPS. EFA/RFD is granted access to the data in real time. The information on issued transport tickets (TT) is public, with the possibility of inquiries from citizens and reporting. Operators are obliged to keep the issued tickets no less than 3 years.

In addition, there is mandatory continuous video surveillance of timber processing facilities, which is periodically inspected by EFA and RFD staff during physical checks. Video surveillance is complemented by electronic diary of incoming and shipped timber from timber processing facilities, access to which is available in the RDF through distant checks. Finally, there is a 24/7 telephone hotline for signals related to forests.

Bulgaria identified some problems implementing EUTR by type C operators. There is a low level of operator awareness of the Regulation, there is a lack of necessary knowledge and information about the applicable regimes in the country of harvesting (origin), there are insufficient resources to hire a monitoring organization, small quantities of imported production lead to lack of interest from the producer companies to provide the requested information.

In order to address those gaps, Bulgaria is planning to increase the number of inspections on imported products, increase the number of field inspections at timber harvesting sites, raising awareness among the operators, increase the capacity of the experts, and encouraging additional information proving the origin of products.

3.4 Bulgarian forests - Measures to prevent forestry crime

Mr. Kiril Tashev presented measures taken to prevent forest crime in Bulgaria. Complementing Mr. Rosen Raychev characterization of Bulgarian forests, Mr. Kiril Tashev clarified that forests are divided, in terms of function, into Protective - 423 138 ha (9%); Special - 2 242 597 ha (54%); and Management - 1 591 465 (37%). Bulgarian Forests protect over 80% of endangered plants and over 60% of endangered animal species. About 55% of the forest area is in NATURA 2000.

One of the most important measures to prevent forestry crime taken in Bulgaria was the establishment of an electronic online system by the Executive Forestry Agency in order to track the movement of the harvested timber by issuing electronic transport tickets. After 2016 a requirement has been introduced for vehicles transporting timber to be equipped with GPS devices to control its transportation. It enables forest-to-customer chain tracing with timber quantities and the forest area from which they were harvested (link between planting, felling, transport, distribution). More information about the system objectives are described above (see point 3.3). The system provides timber transport information to the public via website: tickets.iag.bg (also available in English). For the enforcement authorities, the system can be used via mobile app to facilitate immediate access to transport information.

Bulgaria has also established forest checkpoints, where all timber transports are inspected. Timber yards are required by law to have video surveillance, allowing the authorities to control the amounts of timber entering or leaving the yard. In addition, logging permits are also available online for public information. These measures are intended to address the most frequent violations in Bulgarian forests (illegal harvesting and transportation).

At the moment, 50% of Bulgarian forests are PEFC certified, with the remaining 50% in the process of. It is expected that certification will serve as a preventive measure against illegal harvesting.



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3.5 Enforcement, challenges, and examples of good practices of EUTR implementation in Hungary

Mr. Gábor Lovasi, EUTR officer and forestry supervisor from the Hungarian competent authority, gave a presentation on the implementation of EUTR in Hungary. He started by giving an overview of the EUTR goals, and its context within other global regulation efforts against illegal logging.

Mr. Gábor Lovasi then explained how the EUTR was reflected in national legislation to make fully operational (amendment of the Forest Act, Government Decrees and Ministerial Decree). The main goals of the Hungarian legislation are, like the EUTR, that of stopping illegal harvesting and related trade. The legislation focuses on transparency and traceability along the entire trading/supply chain, repression of tax law infringements to whiten the timber market, strengthening the cooperation between different authorities, offer consumer protection and more conscious consumer activities, and it recognizes a gradual approach due to the complexity of the topic. Some of the initial challenges were the incoherence in certification methods of legal origin and the “colourful” legal and economic environment for timber related activities in the neighbouring countries.

Hungary has 2 060 million ha of forest area, covering 22.2% of the country.

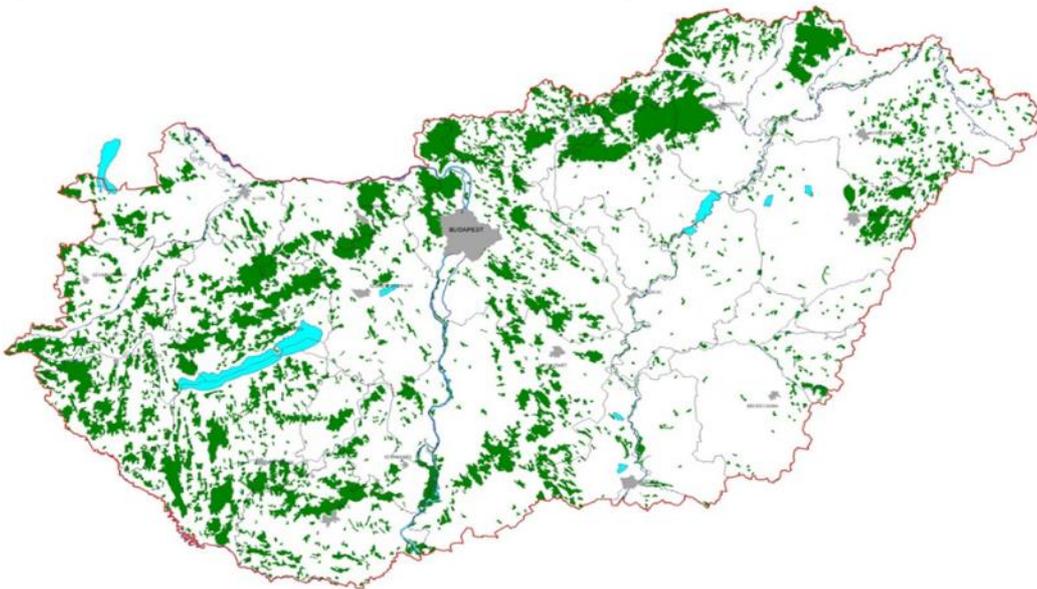


Figure 3 - Forest coverage in Hungary

The country’s forest administration has a long tradition (450th anniversary of first act of forestry, and 135th of Forestry authority). The forest administration does the forest inspection, runs the regional forest management planning, administers the yearly management activities, maintains the registry of forest managers and management units, maintains the National Forestry Database and forest mapping, maintains the Forest Monitoring and Observation System, runs the EUTR system, executes the forestry authority functions at first instances. It does not, however, do any management activities.

In terms of penalties, Hungary applies:

- administrative fines [~160 EUR – 48.000 EUR]
- seizure of illegally harvested timber / product and the vehicle used to transport it
- confiscation of illegally harvested timber / products of such origin or the income originating from the trade of such timber
- withdrawal of the product from the market
- ban on import/export, trade and advertising of the product
- obligation of the importer to return the product to the place of origin



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- prohibition or restriction of timber related activities of the operator/trader
- obligation of the player on making the necessary steps in order to eliminate gaps and mistakes in his timber related activities

The forest act was reformed considering implementation experiences so far. It was adapted to the approach of illegal supply chain members. Vehicle use restrictions were extended to the legal successors also. Any vehicle carrying timber is liable regardless of changes of ownership (thus avoiding subcontracting schemes to evade compliance). End users are now required to keep records if they store more than 20 m3 of primary wood product. In addition, the law now presumes the supply chain member is responsible in timber trade even if the previously purchased timber/timber product cannot be found on site, if legality is not proven, if stocking a big amount (more than 50 m3) of EUTR related product on site. Furthermore the supply chain member is being presumed as owner of the stock if storing product of someone else without register or proof of ownership.

Hungary keeps a EUTR information system. The system includes the aims and methods of annual plan for checks, a registry of imposed sanctions and other measures applied, a registry of delivery notes in use (serial number, user, starting and finishing date of each array), registry of data deriving from advertisements breaching the regulation, data from other national authorities working in cooperation with NCSO (Customs, Police) and other EU Member States. The system also keeps a registry of Operators and Traders according to EUTR – made by a single declaration -, including:

- Technical Identification Number (e.g. AA12345678) for the member
- Identification data
- Economic activity per site where EUTR related activity is actually performed

Each timber shipment shall be accompanied by a certificate of origin. The main goal is that every wood product shall be traceable back to the stand where it was harvested. In addition, inland delivery notes are required for primary wood products. They contain the detailed data content in accordance with EUTR requirements (product name, volume, tree species, place of harvest, reference of felling ticket etc), information and signature of seller, customer and transporter.

Hungary imposes mandatory commercial records for all supply chain members, including records for each site of activity (Certificate of legal origin shall be stored at the site of the stocked timber/products), up-to-date documentation system, and documentation of wood processing (production records, production losses, technology, etc.). The members have to keep the records for 5 years. To help small producers with simple trading activity, the authority provided a voluntary-use template for the records.

There are 6 monitoring organizations² present in Hungary, but so far none is used by the national operators. The competent authority requests information from the monitoring organizations once a year.

3.6 The role of customs control and procedure in managing trade of legal timber, experiences and case study from Croatia

This session was anticipated to precede the plenary discussion.

Ms. Ljiljana Lepotinec, former Head of Department, Customs Administration, Ministry of Finance, and Ms. Anita Pokrovac Patekar, State Inspectorate presented Croatia's experience managing illegal timber via custom controls and procedures.

They started by presenting the EU legislative framework, including its objectives and key dispositions (definition of actors, due diligence system), and how it was translated into national acts. The Law defines the Ministry of Agriculture and the Ministry of Finance, Customs Administration, as Competent Authorities in Croatia for the both EUTR & FLEGT and sets penalty clauses.

The Ministry of Finance, Customs Administration, is responsible for

- In FLEGT:

² Monitoring Organizations maintain and regularly evaluate a DDS and grant Operators the right to use it; Verify the proper use of its DDS by such Operators; Take action in the event of failure by an Operator to properly use its due diligence system.



- Check FLEGT License at the same time as the customs declaration for that shipment is presented for release for free circulation and keep records of the FLEGT licenses in accordance with Article 5 (1) of Council Regulation (EC) No; 2173/2005,
- Checks the shipment covered by the FLEGT license in accordance with Article 10 (1) of Commission Regulation (EC) No 1024/2008,
- Take immediate interim measures in accordance with Article 5 (7) of Council Regulation (EC) No 2173/2005, Article 10 (5) of Regulation (EU) No. 995/2010 and other legislation governing the affairs of the Customs Administration (seizure and prohibition of marketing of timber and timber products).
- In EUTR :
 - inspection supervision of the implementation of the provisions of Article 4 (1) and Article 5 of Regulation (EU) No 995/2010 and Article 5 thereof of 607/2012 shall be carried out by authorized customs officers, in accordance with the regulations governing the customs administration.
 - if, in the course of an inspection supervision, a violation of the provisions of Article 4 (1) and Article 5 of Regulation (EU) No 995/2010 and Article 5 thereof of 607/2012, under the conditions prescribed by the law governing the misdemeanour procedure, the Customs Administration issues a misdemeanour warrant or files an indictment.
 - shall report to the Ministry not later than 1 March of the current year for the previous year on the inspection supervision carried out and the measures taken under paragraph 2 of this Article and Article 7 paragraph 11 of Timber Law

The Ministry of Agriculture:

- verifies and accepts the FLEGT license in accordance with Articles 6 to 9 of Commission Regulation (EC) 1024/2008
- draw up a plan of expert supervision in accordance with Article 10 (2) of Regulation (EU) No 995/2010, and keep their records in accordance with Article 11 (1) of Regulation (EU) No 995/2010
- verify the implementation of the due diligence system in accordance with Article 10 (1) and (3) of Regulation (EU) No 995/2010
- verify compliance with the obligation of traceability of traders in the supply chain in accordance with Article 5 (1) of Regulation (EU) No 995/2010
- draws up an annual report in accordance with Article 8 (1) of Council Regulation (EC) No 2173/2005
- checks the monitoring organisations and produces reports in accordance with Article 8 (4) of Regulation (EU) No 995/2010 and Articles 6 and 7 of Commission Implementing Regulation (EU) No 607/2012
- informs the European Commission in accordance with Article 8 (5) of Regulation (EU) No 995/2010
- draws up a biennial report in accordance with Article 20 (1) of Regulation (EU) No 995/2010
- determines corrective measures in accordance with Article 10 (5) of Regulation (EU) No 995/2010
- Expert supervision of obligations under Articles 4 and 5 of Regulation (EU) 995/2010 and Article 5 thereof of 607/2012 is done by the Ministry by Art. 7

Ms. Ljiljana Lepotinec then provided a detailed description of the customs processes used to verify compliance with EUTR and FLEGT³, including risk analysis.

In the period from January 2017 to December 2018 there were a total of 3589 importing operators. 120 importing operators were planned to be checked based on risk criteria and annual control plan. 104 importing operators (also domestic operators) were actually checked over the reporting period (31 importing operators; 13 importing operators also having acted as domestic operators). In case of not

³ See presentation, slides 15 to 31.



existing operational DDS system, operator is given corrective measures within the time limit for putting it in place. After expiry of the probationary period were complied with the EUTR regulation (by Ministry of Agriculture). If the economic operator does not remedy the deficiencies and fails to implement the prescribed corrective measures within the time limit, the Ministry shall notify the Customs Administration, MF of the irregularities identified and request that they be acted upon. The minimum level of administrative fine is 10.000,00 HRK (cca 1343 €), the maximum 500.000,00 HRK (cca 67 147 €). The Croatian State Inspectorate⁴ is responsible for the inspection activities of a number of areas, including Forestry. The State Inspectorate performs administrative and other tasks related to forestry, forest protection, regulation of legal relations in forests and forest land owned by the state, except property law; timber and hunting; inspection work relating to forestry and hunting; implements international agreements in the part related to forestry; regulation of relations and conditions of production, trade and use of forest seed and forest seedlings, forest ecology, protection of forests from natural disasters and anthropogenic impacts, fires, conservation of forest genetic resources and forest reproductive material. However, the State Inspectorate is not a responsible body for enforcement of EU TIMBER and FLEGT Regulation which has created a confusing legal setting for the implementation of EUTR within the borders of Croatia.

In the period from 1 July 2013 to 31 January 2016, Croatia imported timber and timber products, on which the regulation applies according to the annex of the EUTR, in Amount of 326.903.036,71 EUR. The main import countries are Bosnia and Herzegovina (49,7%) and Serbia (26,9%) with combined 76,6% of total imports. Both countries have remained the biggest source of imported timber in Croatia in 2017-2019.

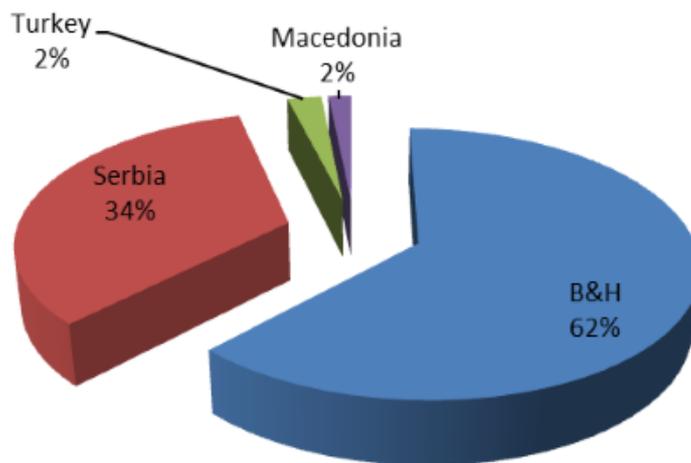


Figure 4 - Imports of timber into Croatia 2013-2016

3.7 Plenary discussion

Mr. Vlatko Trepški moderated the discussion. He opened the floor to comments and questions to the presentations held so far.

An independent EU expert working in North Macedonia took the work to express appreciation for the Bulgarian initiative to develop and implement an electronic ticket system for timber transports. He mentioned that one project in North Macedonia is seeking to develop a forest information system. The Bulgarian system can provide a good example in that context. The expert commented that the implementation of EUTR in the Western Balkans will be challenging. Illegal logging is pervasive, and,

⁴ The Law on the State Inspectorate (Official Gazette No 115/18), which entered into force on 1 April 2019, regulates the organization of the State Inspectorate, management, conditions for conducting inspection activities within the scope of the State Inspectorate, duties and powers of inspectors for the purpose of protection public interest and public health interest in law enforcement and misdemeanormisdemeanour liability.



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according to his experience, the trade is later “legalized” with a paper trail. He mentioned it is important for the region to learn from MS, especially regarding how EU competent authorities are dealing with the problem and how they are addressing pillar 1 of EUTR (access to information).

Mr. Kiril Tashev took the opportunity to clarify the Bulgarian system was built entirely in-house, using the Ministry’s IT Department. There was no assigned funding for the development. He suggested that in case other countries do not have the resources, then connecting existing electronic databases or system can provide a cost-efficient way forward to improve control over the supply chains.

Mr. Robert Režonja mentioned Slovenian experiences with a lack of proper due diligence systems and lack of information. The threat of fines, and pressure from the authorities, pushed Slovenian companies to look for suppliers that can provide information to meet the requirements of due diligence. Although the enforcement efforts took place within Slovenia only, the requirements over local companies ended having positive results in Bosnia and Herzegovina. The import of timber was re-directed to legal actors.

The Serbian Delegation reacted to Mr. Robert Režonja’s earlier presentation in which he presented a case-study of import of timber from a Serbian national park. The representative clarified that it is legal to fell trees in national parts depending on the level of protection. Timber is classified in three tiers: forbidden felling, sanitary cuts, and allowed felling. The Serbian delegate asked the EU experts present on what the role of national authorities vis-à-vis monitoring organizations is.

Mr. Robert Režonja clarified that in the case study, through cooperation, the Slovenian authority succeeded in confirming the timber was harvested legally. He also explained that monitoring organizations provide due diligence systems as a third-party service to those operators that can’t or are unwilling to run their own systems. He also clarified that competent authorities have to control the monitoring organizations to establish their due diligence systems meet the expectation and are functional.

Ms. Ljiljana Lepotinec mentioned that in Croatia the Ministry of Agriculture is responsible for the control of monitoring organizations, but that no control has been made yet. Replying to a request for clarification from Mr. Mihail Dimovski on the import of timber from Indonesia to Croatia with VPA licenses, Ms. Ljiljana Lepotinec reflected that if the Croatian importer is merely re-exporting the timber to another MS, then the customs clearance procedure should list the competent authority of the final destination. In this regard, cooperation between FLEGT and EUTR competent authorities is essential to manage shipments of timber that involve more than one MS.

Mr. Vlatko Trepiski put a question to all EU MS experts present: how did accession negotiations proceed in other countries when the policy making, and the competent authority are in different institutions? How was cooperation and coordination ensured? In North Macedonia the Chapter 27 negotiations will be done by the Ministry of Environment and Physical Planning, but the implementation will be done by the Ministry of Agriculture, Forest and Water Economy.

Mr. Kiril Tashev reported that a similar situation exists in Bulgaria. The Ministry of Environment as the leading institution sets the policy, while the Ministry of Agriculture had to adapt and enforce the rules established.

Mr. Robert Režonja noted that there is no forest common policy in the EU. In addition, forestry is usually out of the competence of environment ministries. He suggested the beneficiaries to study the different approaches taken by MS and to extract the solutions that might be better suitable for the local context. An independent expert from North Macedonia brought the discussion back to the national context. According to him, the EUTR actors are well identified in the country: the ministries of environment, agriculture, economy, the tax administration and the customs authority. Is up to each country to create an interinstitutional system that works. He suggested the Ministry of Agriculture should be the leading negotiator for forest issues within Chapter 27.

A representative from the Federation of Bosnia and Herzegovina explained to the audience the complex system of administration in Bosnia and Herzegovina, involving the state, two entities and cantons. Republika Srpska has a forest law with provisions for illegal logging and timber traceability. The cantons of the Federation of Bosnia and Herzegovina have forest laws, but the Federation itself does not. In terms of timber exports, the MOFTER (state) holds responsibilities for issuing the necessary documentation.



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The same independent EU expert working in North Macedonia took the word to ask a clarification on how forest inspections are done in Croatia. Ms. Ljiljana Lepotinec and Ms. Anita Pokrovac Patekar explained customs is only responsible for checks at the border. Domestic operations should be covered by the State Inspectorate. However, since the relevant forest laws are from 2013 and 2018, and since the Croatian State Inspectorate was created in 2019, there is currently a gap in the law in terms of assigning inspection competence which means there is no effective competent authority for forest inspections. As consequence, since the Inspectorate was created, there is no legal basis for it to perform EUTR related inspections, leading to a complete lack of enforcement.

3.8 Programme for enforcement of forest certification and regional action plan for combating forest crime and corruption

Mr. Voislav Todorov, from the Connecting Natural Values and People (CNVP) Foundation, gave a presentation on the PEFC – (Programme for endorsement of forest certification) in North Macedonia and on the project *Regional action for combating forest crime and corruption*.

CNVP is a Dutch registered civil society organization (CSO) that focuses on building a greener economic environment. CNVP is currently active in the Balkan region in Albania, Kosovo, N. Macedonia, Montenegro, Serbia and Bosnia-Herzegovina. CNVP works in fields of natural resource management, forestry and renewable energy as well as rural development, with aim to reduce the environmental risks and ecological scarcities, as well as to achieve sustainable development without degrading the environment. CNVP is also PEFC International Stakeholder Member and with that has a seat in the Assembly of the PEFC Council.

The PEFC (Program for Endorsement of Forest Certification) is a voluntary mechanism for promotion of sustainable forest management, verified by third party in process of certification. It is an alliance of national certification systems and an international Chain of Custody (CoC) system. PEFC is the biggest global forest certification system, that covers 60% of all certified forests in the world. PEFC certification system is also very suitable for small forest holders, including private forest owners.

PEFC is supported in the Balkans by CNVP. CNVP runs a regional project for increased knowledge related to forest certification, where exchange of experiences is a key element. It supports cooperation in the region related to certification issues and development of certification systems, with an accent on the interest of small forest holders. North Macedonia has endorsed the PEFC national system, as well as Romania, Hungary and Bulgaria. Slovenia already has 300.000 ha of forests certified by PEFC (state and private forests). Croatia and Republic of Srpska are developing their national standards. In wider region, Ukraine and Turkey are starting their national processes.

Certification is composed by two elements: certification of forests (sustainable forest management) and Chain of Custody certification. The interested operator applies to a certification body, that then checks material flows according to the CoC standard. If the traceability is in conformity a PEFC certificate can be issued.

PEFC Certification provides timber legality assurance harvested from responsibly managed forests, traceability and it is an efficient mechanism for companies to demonstrate compliance with the EUTR requirements.

Within the context of EUTR if the product has PEFC or FSC certificate it is ranked as low risk product in the due diligence risk assessments. Only providing evidence of a management plan, report from forest inspection and transport documents in high risk countries is not considered as sufficient proof to place a product in a low risk group.

North Macedonia has made commitments towards sustainable forest management. In its Forest Strategy from 2006 the country seeks to secure regulatory, institutional and economic framework for sustainable forest management. In Chapter 3.2, Measure 5 proposed “Fostering promotion of international standards and promotion of conditions for forest certification”. In Chapter 4.1.2, Measure 1 proposes “Harmonization of national forest legislation with EU regulations and international regulations related to forests”. In Chapter 5.2, Measure 2 proposes “Introduction of forest certification”. The connected Action



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Plan, under activity 40, proposes “Certification of 30% of forests managed by the Public Enterprise (starting from 2007)”.

Accordingly, North Macedonia started the process of adopting a national standard for sustainable forest management (SFM) according to PEFC criteria and indicators. In May 2015, after 19 meetings of the working group composed by the Faculty of Forestry (FF), the Ministry of agriculture forestry and water management (MAFWE), the National association of private forest owners (NAPFO), the Wood processing industry cluster (WIC) and CNVP, the official process of development of national standard for sustainable forest management according to PEFC criteria and indicators started with 13 stakeholders and the establishment of the National Governing Body. In November 2016, on the 21st PEFC general assembly, North Macedonia was accepted as new PEFC member. In September 2017 the final version of C&I was sent to PEFC International for final approval. In June 2018 they were accepted and approved on the PEFC Assembly meeting.

Following that CNVP, with the support of PEFC and SDC, started the process of certification of one management unit (MU) of PE National Forests in Pehcevo (MU Ravna Reka – Pehcevo). The result was issuing of PEFC certificate for controlled wood and non-accredited PEFC Certificate for Sustainable Forest management to the management unit in Pehcevo.

However, certification is stalled in North Macedonia. There is still no accreditation body for PEFC. There are negotiations in progress with Slovenia for it to take over that function.

Mr. Voislav Todorov finished the first part of his presentation by leaving the participants with a few unanswered questions related with the implementation of EUTR in North Macedonia:

- Is the country ranked in the low index of corruption?
- Are there any illegal activities in the forests in the country?
- Are international/EU partners asking for certificates or other proves for legality of timber?
- Are there the needed data/procedures/processes to comply with requirements of the EUTR?
- Is forest certification (SFM or CoC) needed in the country?

The second part of the presentation focused on the project *Regional action for combating forest crime and corruption*. The project is being implemented by CNVP with partners in Montenegro and Bosnia and Herzegovina from December 2018 to November 2021. The grant came from the Norwegian Ministry of Foreign Affairs. The main partners in the project are forestry institutions in the project countries (North Macedonia, Serbia, Bosnia and Herzegovina and Montenegro). The project objective is to achieve good governance in the forestry sector and combat forest crime and corruption, by increased transparency and networking in the four target countries (N. Macedonia, BIH, Serbia and Montenegro). The expected results are creation of a regional network for exchange of knowledge and experiences, development of initial database/GIS data in forestry, related to illegal activities, mechanisms for monitoring of illegal activities in forestry, capacity development of main stakeholders and development/adoption of National action plans for fighting crime and corruption in forestry.

Mr. Voislav Todorov concluded his presentation with a few key ideas. Illegal activities in the forestry sector (in particular illegal logging, although its extent is still difficult to quantify) remains a serious problem all over the WB region, as well as proper implementation of related legislation. Issues related to illegal activities in forestry have been extensively analysed over the past 10 years. One of the conclusions is that exchange of information and know how is still missing on regional level. Monitoring the progress in the action against illegal logging in the region is a difficult task, and needs systematic and regional approach. It is a common conclusion that the problem of illegal activities in forestry has not received enough political will or resources in the region to make significant progress.

3.9 Alignment with the EUTR and Forest Law Enforcement, Governance and Trade (FLEGT) Regulations - Key Challenges in North Macedonia

Mr. Sasha Jovanovic, Head of Department of Forestry and Hunting, Ministry of Agriculture, Forestry and Water Economy, presented North Macedonia’s steps to transpose the EUTR and FLEGT regulation.

Before starting on the presentation proper, Mr. Sasha Jovanovic commented on the situation of illegal logging and lack of governance in North Macedonia. Felling data currently available is insufficient.



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Reported statistics do not reflect the real situation of illegal logging in the country. He considers that since the 1990s there has been no proper forest management in North Macedonia. Previously, the state was successful in managing the sector. Currently there is an estimated 200 000 to 300 000 m³ (around 13 ME) of timber illegally harvested. Cities are the main driver.

Although harmonization with EUTR and the FLEGT regulation are important, as they represent legal improvements, the current governance basis is weak, and it does not address the overwhelmingly national problem of illegal logging. Illegal logging serves the internal market where probably 99% of timber is sold for domestic heating. The price for legal timber in North Macedonia is higher than abroad providing no export incentive. In addition, export controls are strict. The current Law on Forest, complemented by other regulations and amended in 2009, offers a reasonable legislative framework, including strict penalties for illegal logging and related transport, but the groups behind the practice have remained ahead of enforcement. According to Mr. Sasha Jovanovic harmonization with EUTR and FLEGT will be done, but enforcement in the field is the real issue.

Continuing to his presentation Mr. Sasha Jovanovic confirmed EU integration is highly positioned on the Government's political agenda, thus imposing ambitious tasks that need to be met in a short period of time. The state has confirmed that there is a need for strategic planning in the long run in all sectors, in order to achieve a sustainable development of society. In this process, the forestry sector faces a number of challenges that relate to the specifics of the sector and cross-cutting issues.

He set the international policy context with the relevant multilateral conventions signed by North Macedonia, as well as UN and EU initiatives related to forestry. He noted the EU has no legal competence in MS forestry policy and there is no common EU forest policy. Given the fact that forest ecosystems, their management and the forest-based industry varies so significantly across Europe, forest policy is a Member State competence. However, a broad and increasing number of sectorial policies directly affect the European forests, for example environment, climate, energy, agriculture and trade. These sectorial EU policies are often inconsistent or even contradicting and can impact the sustainability and competitiveness of the forest sector.

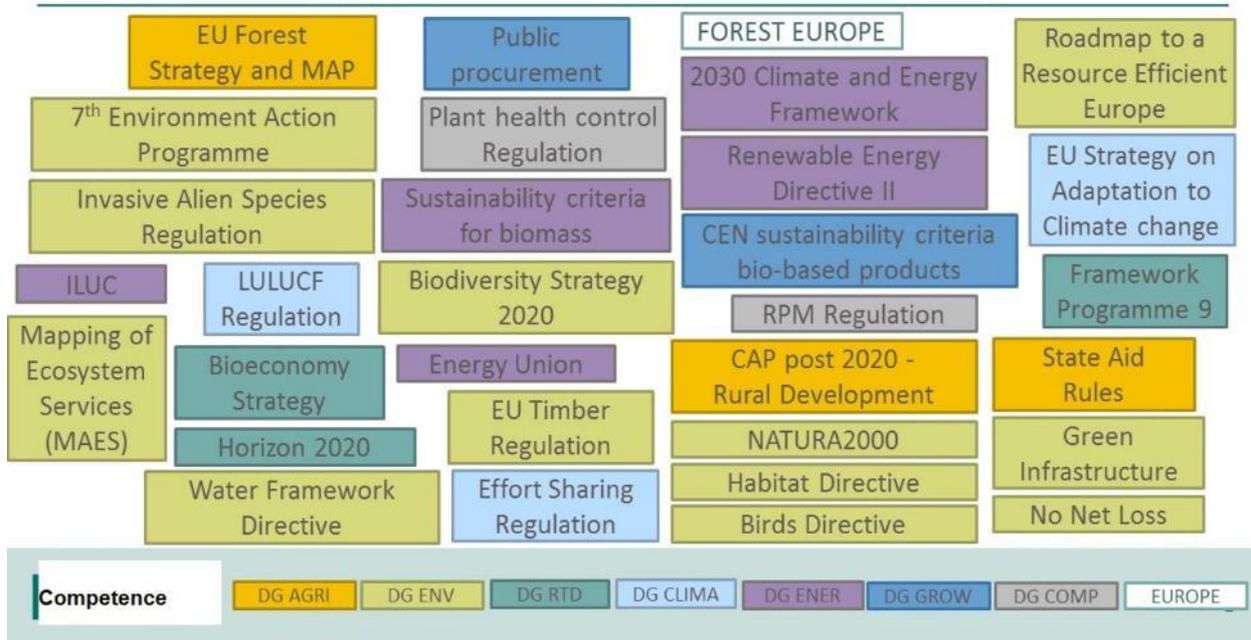


Figure 5 - EU Forest Policy: a complex puzzle

The 2014-2020 EU Forest Strategy provides a holistic framework to all elements of forests and sustainable forest management, including socio-economic and environmental aspects. It intends to balance the increasing sector specific requests and targets on European forests, as well as to better



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enforce the different policies. However, the EU Forest Strategy is only effective if properly implemented and recognized as a key reference by all actors.

The scenario brings challenges to the countries looking to align with the EU policy framework, accompanied by the local specific problems. Mr. Sasha Jovanovic listed the challenges:

- Transformation of the forestry strategy into action, monitoring and evaluation of the effects
- Legislation - creating, overseeing implementation, reporting
- Challenges for participation in the work of international institutions and in international reporting (GFRA, State of Europe Forests)
- Integrating international obligations into national legislation and implementing them
- Restructuring institutional setup and capacity building incl. human resources
- An innovative model for financing forestry
- Advancing the protective functions of forests
- Creating and financing a long-term reforestation and afforestation program
- Sync among Forestry&Agri/Phyto/Rural/Environment/Nature Sectors
- Monitoring and statistics (inventory, health status, fires, diseases, biodiversity etc.) and other national activities (general plan, forest cadastre and demarcation-Forest LPIS etc.)
- Climate change and forestry
- Combating corruption, illegal, unregistered felling
- Cooperation with NGOs, as well as with donors (FAO, UNEP, GEF, SB, bilateral)
- Transparency, participative & multi-sectoral approach

Mr. Sasha Jovanovic then looked at the steps being taken to address the challenges. Currently, there is an ongoing project "Review of forestry sector in North Macedonia and preparation of 2019 IPA project for forestry". This project will have 3 outputs:

- Prepared package of guidelines for the 2019 IPA Call for proposal "Supporting the reforms in forestry"
- Analysis of the forestry sector developments and identification of the needs for future assistance.
- Analysis of the current legal framework in the forestry sector and provision of concrete recommendations for improvements.

Within the 2019 Annual Action Programme, the EU has foreseen assistance of 1,3 MEUR to be implemented as a grant, which will provide activities in order to strengthen the management of the forestry sector. Among others, this project will support the MAFWE for status evaluation and upgrading the legal framework regulating activities in the forestry sector, as well as for preparation of the national forestry policy post 2020 in the context of EU accession, especially chapter 27 (EUTR, FLEGT, LULUCF, NATURA), but also with rural development policies.

3.10 Case study: Timber trade between Slovenia and EPPA beneficiary countries

Mr. Robert Režonja presented a timber trade case-study between Slovenia and Montenegro. A Slovenian company importing timber from Montenegro was checked. During the first visit of the Customs Administration the company displayed: export documentation, shipping note, statement that the wood is purchase from companies which have a concession for logging. During the second visit of the Customs Administration the company displayed an agreement between concessionaire and supplier, a contract on the right of use of the forest by the Government Montenegro, and a risk assessment for the supplier from Montenegro.

The control was assisted by cooperation between the Slovenian and Montenegrin authorities. On the company side, the Slovenian company visited the operator in Montenegro and collected the necessary documentation and celebrated an agreement regarding prompt delivery of documentation which is necessary for DDS.



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3.11 Developing national plans for checks on the implementation of the EUTR

Mr. Gábor Lovasi presented the Hungarian plans for EUTR checks. The authority carried out an analysis of timber production and use. According to the analysis the riskiest product is firewood because of the high risk of possible difference between declared and completed felling volumes, the use of false transporting tickets, relatively small amounts that can be sold in each purchase, low level of awareness, low risk for illegal trading, short trading routes from trader to end user, the existence of a large market and the destruction of evidence given the product's nature.

In response to the situation pictured, the enforcement principles were designed. The inspections are mainly aimed at primary forestry products and in particular at fuelwood, but other wood products are also checked. Hungary is mainly a wood exporting country but the import from Ukraine and Russia is significant as well. The authority focuses its attention to these directions. The authority provides variety of information and guidance to operators to support of voluntary law-abiding behaviour. In case of minor deficiencies sanctions are used based on the principle of gradualness, but at evident infringements the authority uses all legal instruments.

The annual checking plan is an obligation by the EU Regulation and the national Forest Law. It includes the fundamental principles of cooperation with partner authorities, the aims, risks, control methods and target groups, and an annual review. The plan includes joint checks with tax as customs, the national traffic authority, police, and regional forest authorities. In addition, the CA organizes regular trainings for Tax&Customs Authority and Police officers about EUTR requirements.

Checks on importers are done via transport control and site inspections. Cooperation with Tax and Customs Authority and Competent Authorities of neighbouring countries are highly relevant. The relevance of this interpretation has underpinned by discovered illegalities. Therefore, the amount of the unknown-source firewood coming from neighbouring countries was highly reduced.

The Hungarian authority also carries out risk analysis using available data from EUTR, forest management and customs, and the national Traffic Control System. In addition, it selects random clients to inspect, 75% supply chain members and 25% forest managers. It then sends them a written announcement for checking and asking for information. A risk analysis is done on the responses. From the risk analysis 5% are selected for onsite checks in addition to those who did not respond or gave false information.

The authority also gives precedence to operators found in infringement in the previous year. Those checks tend to be done onsite and focus on previous violations.

In order to tackle the black market, the authority runs blind checks with the tax and customs administrations to catch unregistered players and monitor online wood market for suspicious advertisements (low prices, no EUTR technical number, no address or identification of any kind).

Officers performing checks are entitled to enter premises and stop vehicles if there is a reasonable suspicion of violations. They can check technology, equipment, documents, require identification, do sampling, make video and photos and require further information. If a violation is detected, officers are empowered to seize tangible goods, issue an obligation to deliver goods to place under supervision of the authority, issue an immediate suspension of activity by a decision published at the site. In order to enforce the applicable measures, for self-defence or to prevent attack officers carry chemical tools (e.g. disabling spray), baton, handcuffs, and handguns.

Finally, the authority runs several public denunciation channels including phone and email. The authority answered 2282 phone calls and 3191 emails, and 39 substantiated concerns were raised by citizens.

The authority does a yearly evaluation of controls and reports to the EC, the Ministry of Agriculture and the National Food Chain Safety Office. In general, the checks resulted in the reduction of black and grey market for wood product and increase customer awareness.

3.12 Plenary discussion

Mr. Vlatko Trepski moderated the discussion. He suggested that the discussion be guided by the questions posed by Mr. Voislav Todorov in his presentation:

- Is the country ranked in the low index of corruption?
- Are there any illegal activities in the forests in the country?



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- Are international/EU partners asking for certificates or other proves for legality of timber?
- Are there the needed data/procedures/processes to comply with requirements of the EUTR?
- Is forest certification (SFM or CoC) needed in the country?

Mr. Vojo Sokolovski, the president of the National association of private forest owners (NGO), stated corruption is a factor of great concern in forestry. The economic impact is serious. North Macedonia should learn from the good practices of other states. He noted that legislation in itself is not enough to stop illegal activities. The law requires enforcement. He stated private forest owners will continue to participate in certification schemes, even though private owners have only 10% of the forest, most with small plots. In his view certification should be applied to the entire forestry sector. He noted forest owners rarely have any support in certification processes.

Mr. Vojo Sokolovski shared concerns about the lack of reliable forest information. According to him, the last trustworthy data is from 1979. A great amount of work remains to be done in North Macedonia. EC support is welcome. Stakeholders must work together and agree on next steps to address the current problems. In this regard, the coming IPA project will be useful to provide an overview of the forestry sector.

Another participant from North Macedonia made the point that corruption is systemic in North Macedonia, and not restricted to forestry. Sector restricted approaches will not have the desired results. He noted that the forestry enforcement sector in North Macedonia has around 2000 people between police, inspectors, public enterprises, etc. The sizeable network of institutions cannot stop illegal harvesting and consumption of timber of 200 000 to 300 000 m³ per year showing a deficiency within the system.

He also mentioned the lack of judicial footprint over illegal forest practices. Even if cases are brought to prosecutors and then to courts, most often there are no meaningful outcomes. He gave the example of the Themis Network that sought to involve the entire enforcement chain (from inspection to courts) in capacity building and awareness raising initiatives.

3.13 Austrian Criminal Police tasks in the field of environmental crime, specifically forestry crime

Mr. Karl Frauenberger presented the activities of the Austrian Criminal Police regarding environmental crime, especially that related to forestry.

Environmental crime is defined in Austria according to the EU Environmental Crime Directive and as implemented into National Law. The main bodies responsible are the police, customs (with cross border focus), administrative Authorities (accessoriness – link to penal law), and prosecution offices.

The police, in particular, has a criminal intelligence service has an environmental crime unit that plays a role in national coordination through multiple working groups, and serves as the contact point for international efforts (Interpol, Europol, EnviCrimeNet, projects, etc). In addition, there are nine environmental crime investigation units, one for each Federal State, employing 30 investigators. The units investigate major crimes and guide uniformed police officers. There are 600 uniformed police officers, that apart from other duties, were trained to investigate local environmental crime and assist the 30 investigators. Finally, there are two special police units that also deal with environmental issues, namely the Traffic Police (ADR Dangerous Goods and Waste Shipments) and the Water Police (Danube River).

Mr. Karl Frauenberger then presented EMPACT (European Multidisciplinary Platform against Criminal Threats). Within that Platform, the European Union assesses its threat to internal security in a so-called Policy Cycle using a Serious Organized Crime Threat Assessment (SOCTA) that is carried out by Europol. In 2018 – 2021 Environmental Crime is one of the Priority Crimes. This MASP (Multi Annual Strategic Plan) and the related annual OA (Operational Actions) define specific actions, for instance on Illegal Logging and timber trade through joint inspections to tackle traffic and commerce of illegally logged timber in origin countries and within EU.

Mr. Karl Frauenberger gave an overview of the environmental crimes' directive. All offences must be committed intentionally or by serious negligence, offences must be unlawful acts, i.e. breach of EC



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legislation listed in annexes (the proposed list of offences is a minimum list). Criminal offenses are unlawful acts that cause or are likely to cause substantial damage to the environment, including emissions of materials or ionising radiation into water, air or soil, management of waste, operation of an installation where a dangerous activity is carried out, and production, use, treatment, transport, import, export of radioactive substances. There are also special offenses defined as having significant deterioration of a protected habitat, illegal shipment of waste in a non-negligible quantity, killing, destroying or illegally trading in endangered plant and animal species, illegal trade in or use of ozone depleting substances.

The proposed offences will have to be considered criminal offences in the MS. Aiding and abetting or inciting such offences must be punishable too. Legal persons must be held liable for acts committed for their benefit (criminal or other liability). MS must put in place dissuasive, proportionate and effective criminal sanctions (or non-criminal sanctions for legal persons).

EU Member States are implementing the EU Directive 2008/99/EC (Environmental Crime Directive), but enforcement is still not harmonized. There are differences in capacity, knowledge, priority. A recent evaluation gave MS recommendations for improvement. Some of the most common were:

- Create an overall strategy on environmental priorities and environmental crime
- Create specialized competent units tackling environmental crime (law enforcement, justice)
- Build up appropriate capacity in the whole enforcement chain
- Create agreements (memorandum of understandings) including all stakeholders
- Build up integrated statistics to follow cases from the beginning to final closing
- Build up a central unit for coordination of national and international cooperation

The Austrian experience with the Directive shows that challenges remain. The link between administrative and penal law must be strengthened, the proof / evidence of the crime (sampling and analysis) must be improved, there are few trained prosecutors resulting in poor prosecutions and there are yet no appropriate sanctions. The new Government in Austria with the Green Party (January 2020) is putting raising environmental Crime to be a priority and its expected Austria will undergo efforts to meet the evaluation recommendations above.

Regarding forest crimes, Austrian companies (timber for the paper industry and parquet floor industry) are regularly suspected of involvement in illegal logging and shipping of timber and wood in, and from, Eastern Europe. The current challenges are to find evidence in Austria to begin an investigation and to support investigations of colleagues in the source countries.

3.14 Environmental Crimes Directive and its challenges - Croatian experience

Ms. Anita Pokrovac Patekar followed with the Croatian experience in implementing the environmental crimes directive. She started by highlighting that, today, environmental crime represents one of the most profitable and the fastest growing areas of international criminal activities. The underlying driving forces of this type of crime are the growing global need for natural resources, a victimless type of crime, economic benefits that involve opportunities for high profits, often there are regulatory gaps, not only in national but also in international legislation. It is still extremely difficult to estimate the lost value related to environmental crime. An estimation⁵ of the annual value of stolen natural resources are US\$ 91 to 258 billion (annual growth of 5 to 7%). Environmental crime is one of the four largest global crimes, right after drug trafficking - US\$ 344 billion, counterfeiting – US\$ 288 billion, and human trafficking - US\$ 157 billion. Therefore, it is not surprising that the need to address “different forms and manifestations of transnational organized crime that have a significant impact on the environment, including trafficking in endangered species of wild fauna and flora, including timber trade” has been mentioned in a Resolution of the UN Economic and Social Council (ECOSOC).

In 2011 the EU was the second largest single importer of timber products. It has been correctly pointed out by the EC that forest crime appears to take place in four forms:

⁵ Source: http://www.unicri.it/in_focus/on/UNEP_UNICRI_publication_Knowledge_environment



- illegal exploitation of high-value endangered (CITES listed) wood species, including rosewood and mahogany
- illegal logging of timber for sawn wood, building material and furniture
- illegal logging and laundering of wood through plantation and agricultural front companies to supply pulp for the paper industry
- utilisation of the vastly unregulated wood fuel and charcoal trade to conceal illegality

In Croatia, the perception of environmental crime is underpinned by the notion that it is a crime without victims and immediately visible consequences. Often there is a lack of appropriate attention paid by the authorities, police, public prosecutors, judges and by the public. In addition, there is insufficient prosecution instruments compared to other crime and, statistically, these crimes are often considered to be just an economic crime.

The experience so far demonstrates Croatia needs to raise awareness on the harmfulness of environmental crimes not only with competent authorities, but also with the public and NGOs. The existing legislation mandates inspectors to file an indictment of misdemeanour or criminal charges, but in practice it has been difficult to recognize the differences between both. It is often difficult to determine whether the damage to the environment is such that it should be reported to the State Attorney's Office. Further cooperation with public prosecutor is necessary. In addition, there is often overlapping in competences of various state bodies making the institutional and legal framework an obstacle to successful enforcement.

Croatia has also faced difficulties to ensure a high-quality on-the-spot investigation and effective criminal proceedings due to the interval between the committing of the crime and the initiation of the investigation, as environmental crimes often are not immediately visible. Other existing challenges are the long lasting procedure related to environmental damage assessment, the lack of available human resources for the investigation of environmental crimes, the lack of specific knowledge or specialisation (police, public prosecutors, judges), insufficient competences/ experience of experts/ court witnesses and incomplete first on-the-spot investigation and loss of evidence in case of a second on-the-spot investigation.

The low level of prosecutions, especially in forest crimes, is seen on the State Attorney Annual Report of 2017 in which there were only 20 cases (1.6% of total) related to the Croatian Devastation of Forests Act, article 209. Environmental crimes have reduced priority.

Croatia has recent experience with an EU TWINNING with Austria, HR/2011/IB/EN/01 TWL: Capacity building for preventing, recognizing, investigating and prosecuting offences against the environment (CRO ENOFFENCE). The project recommended Croatia:

- to sign a Memorandum of Understanding on co-operation between stakeholders relevant for environmental Crime recognition, detection, investigation and prosecution
- to provide the specialisation on environmental crimes and related trainings inside the police
- to provide joint trainings for specific groups of stakeholders and start with joint trainings of the uniformed police and customs units
- Police, Customs and Justice representatives to participate in international fora on environmental crimes together with inspection services
- to implement the improvements related to misdemeanour offences and criminal acts against the environment

3.15 Discussion: EPPA beneficiaries' competent authorities - institutional setting, current state of illegal logging, good examples of policies and initiatives

Mr. Vlatko Trepiski moderated the discussion. The first intervenient was Ms. Marina Malish Sazdovska, from the University "St. Kliment Ohridski" – Bitola, Faculty of Security. She stressed that environment crime in Macedonian forests is very often organized crime associated with violence. She gave the example of the murder of forest police officers and forest stewards. Ms. Marina Malish Sazdovska also mentioned that given the volume of trade, and associated large transports of timber, corruption must also play a



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role in the illegal harvesting and commercialization of timber, especially visible in the absence of new case detection. Another weakness is the lack of specialized inspectors in the Ministry of Interior causing weak enforcement. In addition, she believes the judiciary does not see these unlawful activities as a priority, leading to weak sanctions and therefore a weak deterrent. The future involvement of prosecutors and judges is essential to improve governance in the future, as well as a more systemic approach to the problem. Current efforts tend to be sporadic.

Another participant, presenting herself as member of the Forest Police, stated that existing laws provide a good governance structure, even though forest stewardship is still incomplete. According to her, the forest police is caught in an enforcement dilemma. There are both misdemeanour and criminal procedures in the law. However, criminal procedures often end in conditional sentences (the maximum allowed by law is 3 years in prison) and diminutive monetary fines (maximum of circa 3500 euros). The forest police therefore prefers the misdemeanour approach, where the burden of evidence is lighter, and it empowers the authority to issue fines and seize the material and vehicles. In 10 years, the forest police issued around 15 000 misdemeanour reports. In more recent times, there were 109 reports that amounted to the seizure of timber worth over 2 ME. They also cooperate with the Ministry of Interior and other agencies like the border police and the forest guard. However, the participant noted there is a break in the enforcement chain with prosecutors and courts.

The Director of a Forest Public Enterprise intervened to say the protection of forests is complex and daily experience shows that there are multiple entities involved, with different competences and rights. In terms of cooperation, the participant stated the experience is positive with the forest police. She also noted that The North Macedonian Forest Guard, with a complement of 300 guards, still does not succeed in steaming illegal logging. The participant related unsuccessful enforcement with corruption.

Mr. Vlatko Trepski then requested the EU MS experts to share their countries experience with enforcement.

Ms. Anita Pokrovac Patekar said enforcement issues are common. In Croatia, there are also overlapping state bodies resulting from excessive production of laws, by-laws, and regulations. The country has 37 legislative texts for timber protection alone. The situation causes a lack of enforcement effectiveness.

Mr. Karl Frauenberger stated Austria currently does not experience significant illegal logging issues. He recognized socio-economic conditions are a key driver for it. Echoing the idea of Ms. Anita Pokrovac Patekar he wondered if both legal and institutional complexity are not, in themselves, drivers of illegal logging and corruption in general. He mentioned that in OSCE's latest meeting of the group "Friends of Environment, it was recognized that corruption was major obstacle to better enforcement. When asked by a participant from Bosnia and Herzegovina regarding the history of illegal logging in Austria, Mr. Karl Frauenberger remembered that the post-WW2 scenario put pressure of Austrian forests as people were looking for a cheap or free fuel source for domestic heating. Nowadays, the Austrian population as a high level of awareness on the issue and the public cooperates with the forces to provide hints of possible breaches of law, including for other areas like pollution, illegal waste dumps, etc. In this line, he thinks it is worth to invest in children education as a way of preparing the next generation to be more aware citizens.

The same Bosnia and Herzegovina participant also asked Ms. Anita Pokrovac Patekar if there is currently anyone in jail for illegal logging in Croatia. Ms. Anita Pokrovac Patekar replied no one is jailed. The prescribed penalties are usually not applied to their maximum by the courts.

A participant from Serbia quickly characterized the Serbian situation. Serbia has 2.2 million ha of forest, 29% of the country's total area. 50% of the forest area is state owned, where management is better. Illegal logging tends to exist more in private forests. Serbia uses 6 million m³ of timber per year, but only 4 million m³ is harvested legally. The remaining balance is therefore made through imports and illegal logging. Serbia has amended the relevant law to enlarge the jurisdiction of forest inspectors and the obligation of courts to respond to forest inspector cases. Courts are now required to seize the timber. In 2019, courts seized 11 000 m³. The more stringent measures have resulted in an increase of tax collection, as all harvested timber must pay a tax. As illegal logging is greatly driven by poverty, the participant noted



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that in Serbia illegally felled timber is not always stolen. Often owners fell timber without the license to evade taxes, resulting in illegal timber, but not stolen timber.

A representative from the Ministry of Agriculture, Forest and Water Economy asked Ms. Anita Pokrovac Patekar more information about the Twinning project Capacity building for preventing, recognizing, investigating and prosecuting offences against the environment (CRO ENOFFENCE), while noting that North Macedonia needs international cooperation to combat environment crime.

Ms. Anita Pokrovac Patekar replied that Croatia recognized its weaknesses and directed EU funds for that purpose. The project was very important to create awareness. It supported the initiative to bring together inspectors, police, customs, academy of judges, representatives of judges and Ministry of Justice. It was the first time all stakeholders were gathered for the purpose. Austria provided expertise to drive the process. Ms. Anita Pokrovac Patekar concluded that it is important to use EU funds to engage hierarchies and show the relevance of the outcomes to better governance.

Mr. Karl Frauenberger added that Austria is preparing a TAIEX study visit in March 2020 for Montenegro authorities focusing on the environmental crimes' directive. The study visit will rely on the input of multiple authorities of Austria.

Mr. Vlatko Trepiski commented on the importance of twinning. It provides a great tool to work with colleagues from EU MS. He inquired what is the role of CSO activism to impact forest policies and its implementation. Mr. Karl Frauenberger replied CSO provide an important form of civil participation. In Austria, CSOs are assisting the authorities with enforcement efforts in illegal hunting and illegal killing of birds. In general, Austria has good experiences with the cooperation between CSOs and authorities, where CSOs are complementary to enforcement activities.

Mr. Mihail Dimovski closed the discussion by remembering participants that EPPA can assist its beneficiaries with specific requests within the project or assistance in preparing for and coordinating TAIEX short term assistance.

3.16 Presentation from the Civil Society Organisations on activities related to combating illegal logging

Mr. Aleksandar Nikolovski, from the NGO Fragricom, presented the overall situation of illegal logging in North Macedonia. In his view, illegal logging is the main issue when it comes to implementation of the EUTR. Although EUTR transposition is important, the main challenge will be its implementation and the regulation of the firewood internal market.

There are 75 million m³ of wood stock in North Macedonia. A 2015/16 study of the Faculty of Forest calculated the total use of firewood in the country based on available statistical data resulting in a concerning picture. Illegal logging is assumed to have gigantic proportions in the country, with a tendency to get worst with time. Mr. Aleksandar Nikolovski agrees with assessment that the business involves organized, informal groups.

Mr. Aleksandar Nikolovski believes wider measures are necessary. Although penal policy is a tool, the problem requires that supply and demand are addressed in a structural way. As the situation stands there is a demand for 2.2 million m³ of firewood annually. There are an estimated 550 000 households using firewood for heating or other purposes. The prices of legal wood in North Macedonia are also very high (60 EUR/m³), which means there is an inbuilt incentive for the illegal practices to continue. Illegal timber sells for half the price of legal timber.

In order to address the problem, measures on the demand side are also needed. Old heating devices should be replaced in order to increase the share of woodchips or pellets, and replace the technological basis with newer, efficient stoves. Energy demand should also be reduced by 500 000 m³ yearly to create a positive impact on forests. This requires more than enforcement of forest legislation. It requires fiscal policies, and energy efficiency policies, for instance with building insulation in addition to the use of better heating devices.

A 2017 study by the World Bank provided good recommendations. Infrastructure should be built or improved to allow the use of forest biomass (naturally fallen wood and other debris).



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A combination of such policies could cause drastic savings in energy, quickly offsetting the cost of new investments, both public and private.

Regarding the enforcement side, NGO's have limited capacity. Given the seriousness of the matter, involving organized crime, NGOs are restricted to providing technical support and running public awareness campaigns.

3.17 Presentation of FAO Forestry Programme activities in Kosovo

Mr. Naser Krasniqi, from the Food and Agriculture Organization of the United Nations, Regional Office for Europe and Central Asia, presented a project on enhancing timber legality, trade and law enforcement in forest sector in Kosovo*.

It is a four-year programme on sustainable forest management with a specific component on timber legality, trade and law enforcement in forestry. The programme is designed in close cooperation between forestry authorities, FAO and donor community. The programme's overall cost is estimated at the amount of 5,3 M-USD and its main parts are going to be financed from the contribution of SIDA, EU and MAFRD. FAO is main implementing agency in cooperation with MAFRD and KFA and with support from other relevant ministries.

The development objectives are to strengthen institutions that are governing with forests, improving decision-making processes, involving forest stakeholders in the development of new forest policies and legislation, introduction of multipurpose forest management planning, restoration of degraded forest lands, and forest protection measures. The programme will also contribute to enhance the investment on forest resources, contribute to address climate issues, integrate forestry relevance to development plans of the territory and processes and thus increase the sector's contribution to the overall economy in Kosovo. The programme is structured around three components with a total of 10 Outputs, each further operationalized into specific activities.

Timber legality will be addressed in two ways:

- By setting up a strategic national system to effectively deal with illegal logging, meaning to establish effective mechanisms and tools applicable to counteract on all breaches of the forestry related laws, to eradicate present illegal activity In forest sector and in timber trade and to assist the forest sector stakeholders to convert the public opinion on saving high-value forests.
- By preparing multipurpose forest management plans and piloting their implementation in participatory ways in order to increase legal supply of timber at target areas, meaning to introduce Multipurpose forest management with the objective to ensure legal supply of timber and promotion of other forest related products, including Non-Wood Forest Products (NWFP), climate and environmental protection functions and recreational values in the planning and implementation of forestry.

Overall, the timber legality component is mainly linked to law enforcement and enhancing the contribution of formal forest sector to national income.

In terms of outputs the programme has several areas of impact:

- In terms of legislation:
 - Programme ensures that the necessary by-laws (at least 5) are designed and enable enforcement of robust forest crime legislation.
 - Programme ensures that all entities and stakeholders are consulted during the process of drafting and before adoption of the by-laws.
- In terms of public service capacity:
 - Programme strengthens competent authorities through on-the-job training to forest personnel including Forest Inspectors for counteracting illegal activities
 - In order to raise the high-level ownership, programme will support to establish a Kosovo Task Force on Timber Legality with a mandate for coordination and coherent action.
 - Design and make operational an electronic Chain-of-custody system and due diligence procedure for detecting illegal and unsustainable wood in transports and trade.



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- Complementary to the human capacities, Programme will help to also procure more effective technologies and equipment to undertake unprecedented technical surveillance on illegal activities conducted in the forestry sector
- In terms of public Awareness rising:
 - The Programme ensures high level of public and media visibility around the need to prevent illegal deforestation practices
 - Define the scope and communication tools and support to conduct awareness rising campaigns to change public opinion and perceptions in order to take greater responsibility for this natural resource.
 - Monitor implementation of media contracts and assess impact of the awareness rising campaigns.

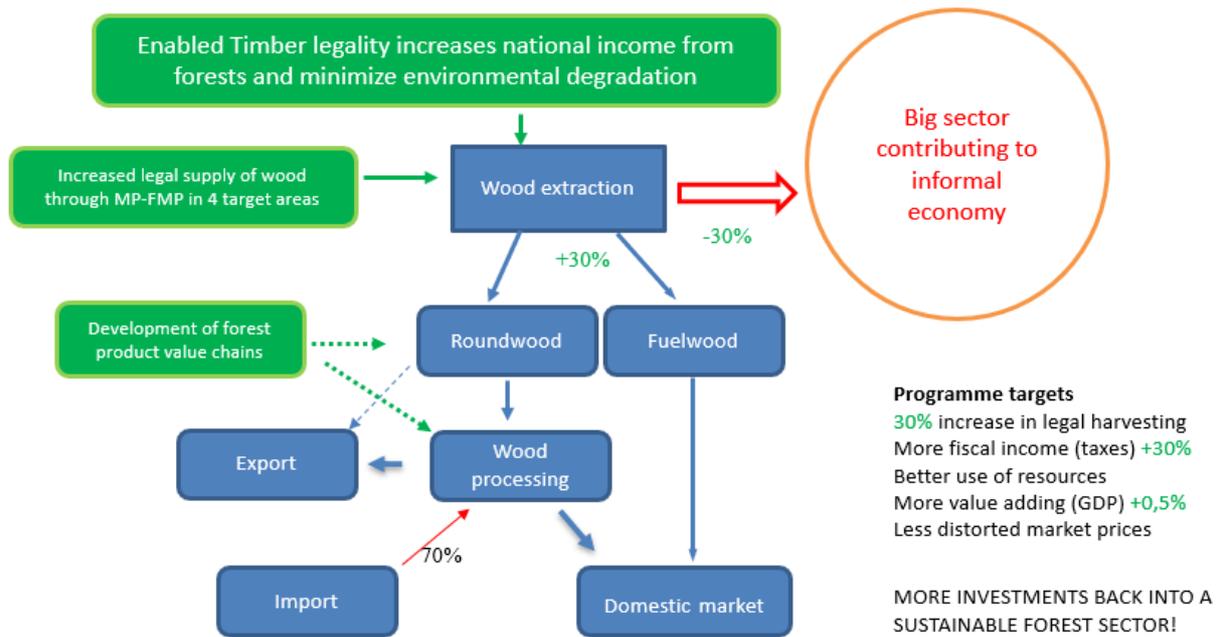


Figure 6 - Impact of the programme results on reducing illegal logging

Mr. Naser Krasniqi also identified the main challenges facing Kosovo*:

- Legislation and sectorial policies are well designed and in place, however to great extend the chain of enforcement is lacking and characterized with inefficient and ineffective governance systems that do not produce significant revenues for the economic potential.
- Unclear division of forest management responsibilities and poor coordination between forest authorities, municipalities and forest owners
- Lack of resources to develop and implement sustainable forest management plans (only around 60% of public forests covered with FMPs and implementation rate of harvesting plans is low)
- Lack of effective support from legal system to address illegal forest activities through courts (backlogs and forest cases not a priority)
- Environment and especially forestry sector are low in the government priority agenda
- A high demand for firewood by rural/peri-urban people depending on firewood for heating and cooking
- Overall socio-economic situation in Kosovo, (high unemployment rate and high poverty), especially in rural areas
- Lack of available alternative energy resources for heating and cooking at the market (most used are wood fuels, coal, electricity)
- The illegal logging for obtaining firewood is increasingly driven by high domestic energy prices



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- Fragmented and small private forest holdings (one/two hectares on average) often subject to unrecorded forest operations and with owners who have limited knowledge on forest regulations

4 Conclusions

The workshop provided a useful forum for the beneficiaries to discuss the current management of timber in the region, and to learn from EU MS experiences with the implementation of the EUTR and FLEGT regulation.

The presentations and discussions that followed yielded a number of ideas, that can constitute a road map for better forest management and combatting illegal logging.

The participants stressed multiple times the need for interinstitutional cooperation and coordination for policy harmonization with the EU and its enforcement. In parallel, cooperation of the public sector with both the regulated communities and civil society, for key activities like enforcement, raising public awareness, and developing due diligence systems will be vital to ensure the success of any reform and EU harmonization.

Although further enforcement capacities to the relevant entities is also necessary, some of the participants noted that it will be essential to have a holistic approach to national wood markets, by working not only on timber-related regulation but also on structural, positive incentives to supply and demand, in particular energy efficiency policies (insulation, heating), access to forest biomass as an energy source, fiscal policy, etc.

The participants recognized forestry as a sector that is vulnerable to corruption and organized crime infiltration. A sustainable approach will have to deploy structural policies to address corruption and stem organized criminality.

In this sense, practitioners should also invest in the improvement of the chain of enforcement coordination from detection, investigation, prosecution to the courts, in addition to building the respective capacities.

Administrative capacity is to be improved by leveraged EU funds, when available, and by regional cooperation in the beneficiaries and exchange of experiences with EU MS. EPPA will also provide further capacity building.

Finally, the participants agreed with the importance to invest in electronic systems for timber traceability and the establishment of a chain of custody, including transport. In this regard, the Bulgarian experience is very positive. As an outcome of informal discussions on the side-lines, the Bulgarian experts (Ministerial representatives) agreed to explore cooperation with the Turkish authorities to share the Bulgarian tech platform for timber transport tracking⁶.

Workshop outputs

The workshop's main outputs were:

- Review of the state of alignment with the EUTR in EPPA beneficiaries
- Enhanced understanding of the challenges and tasks connected with the implementation of the EUTR
- Enhanced exchange of experiences and knowledge between the beneficiaries and EU Member states regarding the implementation of EUTR
- Enhanced regional cooperation between the EPPA beneficiaries regarding enforcement of timber legal dispositions, with a focus on cross-border trade
- Identified key challenges for the implementation of the EUTR in EPPA beneficiaries
- Initiated cooperation between Bulgaria and Turkey for the sharing of technical platform to track internal timber shipments

⁶ See the online platform at: <http://tickets.iag.bg:8080/cgi-bin/index.cgi>



5 Evaluation

The participants were asked to evaluate the workshop post-factum. They received an electronic questionnaire from the EPPA Secretariat, after the event, in order to assess the impact of the workshop in light of the project objectives.

The participants also filled in a second questionnaire circulated electronically by TAIEX, asking them to provide feedback on technical and logistical aspects. This report presents the results of the first questionnaire.

5.1 The EPPA impact evaluation

The EPPA impact evaluation questionnaire is composed of six questions, the first five looking at the specific impacts of the workshop, and one asking the respondents to offer their opinion on their country's priorities and suggestions for future EPPA events.

The first five questions are "agree/disagree" questions, in a scale from "strongly disagree" to "strongly agree". Each includes a space allowing the respondents to explain or offer more information about their level of agreement. The final question is of open-ended type.

The results of each question are presented here, one by one. Nine participants filled in the questionnaire, as follows.

Beneficiaries	Nr of answers
Albania	3
Bosnia and Herzegovina	1
Kosovo*	2
Montenegro	0
North Macedonia	2
Serbia	1
Turkey	0
Undisclosed	0

Table 1 - Answers per beneficiary

Question 1 - The event agenda, and corresponding outcomes, were relevant to my country's priorities and needs in the given subject

88% of the respondents strongly agreed or agreed the agenda and its outcomes addressed their countries priorities, showing a largely adequate approach to the topic. On the comments two participants pointed the importance of the EUTR to stem illegal logging and illegal imports of timber in the Beneficiaries. One of the participants considered close cooperation with neighbouring administrations to be essential for the implementation of EUTR and to improve forest governance. Another participant highlighted the importance of learning from good practices, regarding the transport of illegal timber, in the context of the legislative developments taking place in his/her country at the moment.



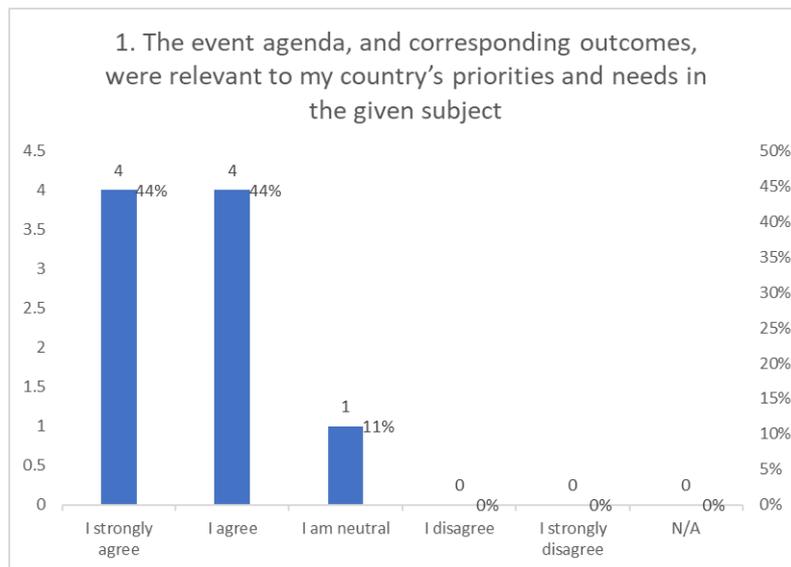


Figure 7 - Agenda and outcomes relevance

Question 2 - My work performance will benefit from the event in terms of knowledge/expertise gained, contacts established, best practices, others

The totality of respondents considered the workshop to contribute to their work performance in a positive way. In the comments, the respondents stressed the opportunity they had to establish contacts with colleagues from the region, facilitating future cross-border cooperation. They also showed satisfaction with the best practices presented and the examples of compliance monitoring over timber transport.

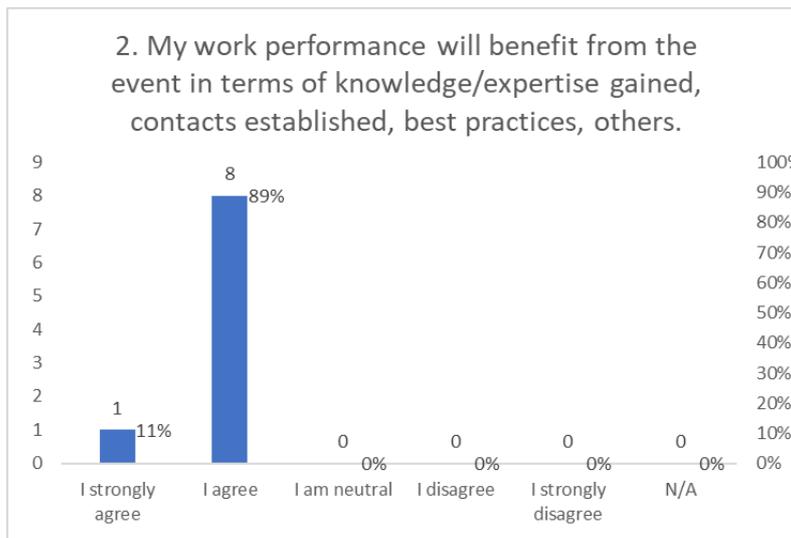


Figure 8 - Better work performance

Question 3 - This event contributed to enhanced regional cooperation in the EU candidate countries and potential candidates in the implementation of the EU environmental acquis

56% of respondents agreed that the workshop contributed to improve regional cooperation, while 33% strongly agreed. Only 11% were neutral about the question. One participated stated in the comments: "it is true that this event has increased the value of mutual cooperation between different countries, starting from the introduction of cooperation between the EU member states themselves".



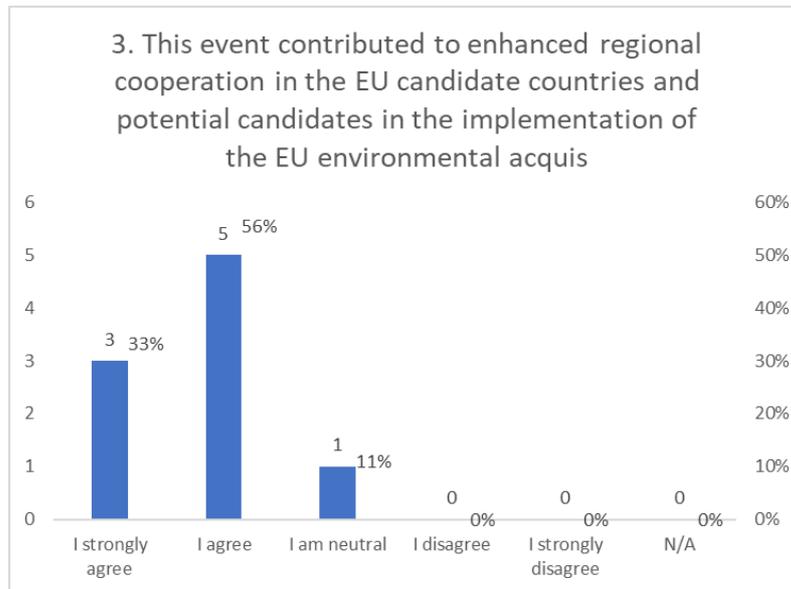


Figure 9 - Regional cooperation

Question 4 - This event contributed to increased alignment of my country’s legislation with the EU environmental acquis, and its enforcement

Regarding the contribution to alignment, 44% were in strong agreement and 44% agreed with the statement. Only 11% were neutral. One of the respondents noted in the comments that the workshop helped to clarify some dilemmas regarding the EUTR and FLEGT implementation. Another participant mentioned his/her country will soon have a new Law on Forests. During the process of drafting the regulations and guidelines deriving from that Law, the participant expects that the lessons learnt from the workshop will be useful to ensure the provisions of EUTR are properly reflected in the national legal provisions.

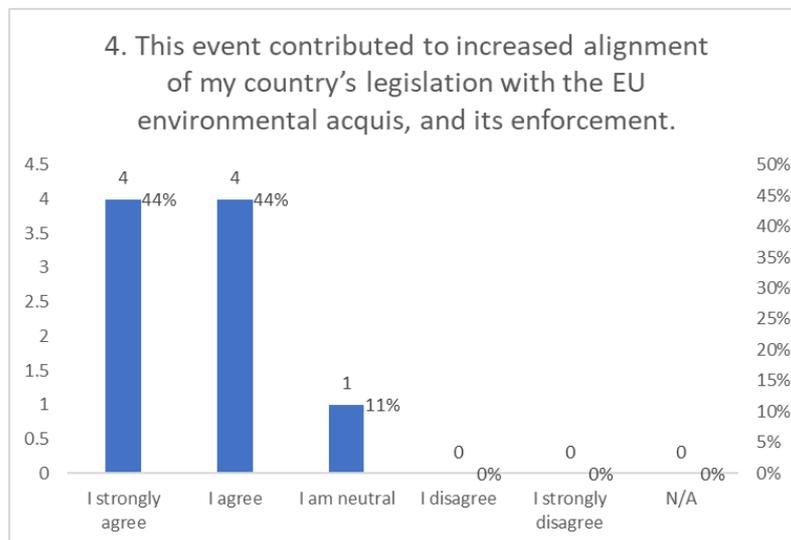


Figure 10 - Alignment with the EU acquis

Question 5 - This event contributed to increased capacity and technical knowledge of my organization to deal with transboundary environmental issues, in line with EU acquis

89% of respondents strongly agreed or agreed that the workshop contributed to increase technical capacities at their organizations to deal with illegal logging and illegal timber issues. One participant highlighted the practices of inter-institutional cooperation in Bulgaria, Austria, Slovenia and Croatia were



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very interesting. The examples of others were considered helpful to determine the most important tasks, demands and how to deal with problems in the most efficient way.

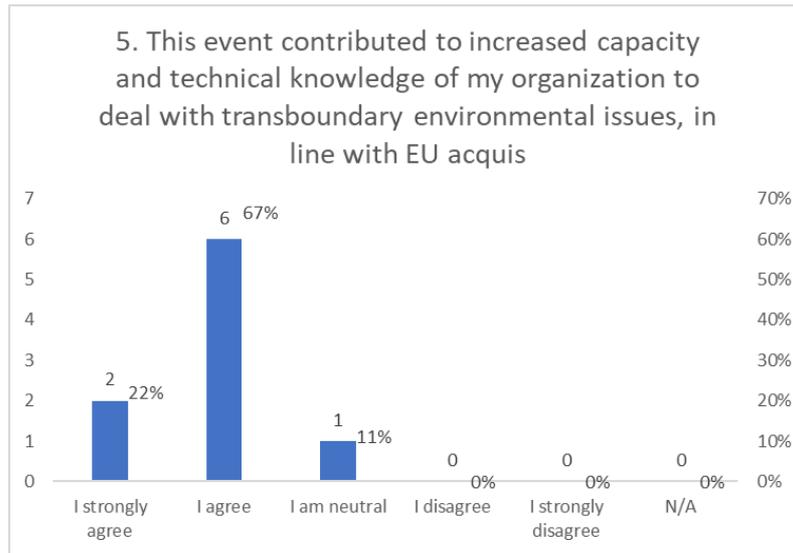


Figure 11 - Capacity for transboundary issues

Question 6 - Do you have general recommendations, for the future, regarding the topic and how best to address your country’s needs?

In the final, open question asking participants to provide suggestions for the future, two requested that interpretation should be done in both official languages of the country (Macedonian and Albanian). One participant from Kosovo* flagged the need to work together with EU experts, perhaps in a TAIEX mission, to have a more detailed knowledge transfer on EUTR implementation. Respondents also suggested more case-studies from the region, practical work during the workshop, preparing standard operating procedures for the authorities involved in timber controls, and to launch a joint platform of all stakeholders.

Endnotes

* This designation is without prejudice to positions on status, and is in line with UNSC 1244 and the ICJ Opinion on the Kosovo Declaration of Independence.



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