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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

**Group of Specialists
European Diploma of Protected Areas**

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Belovezhskaya Pushcha - Management Plan : Peer review (first draft)

Belarus

Expert report by
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(Belgium)

*Document prepared by the Directorate of Culture
and Cultural and Natural Heritage*

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I. Introduction

After presentation of our expert report in 2006 to the Group of Specialists concerning the renewal of the European Diploma for the Belovezhskaya Pushcha National Park, we could follow the discussions within the Group. As the renewal was postponed until a management plan was established, the secretariat of the Council of Europe appointed us as a consultant for a peer review of the management plan.

The Contract nr. 138/09 was signed 25.09.09

(1) Terms of reference

Article 1. Nature of services and work completion date

1.1 The Consultant undertakes, on the conditions, within the limits and in the manner laid down by common agreement hereafter excluding any accessory verbal agreement to:

- ...
- peer-review, in cooperation with the members of the Group of Specialists on the European Diploma of Protected Areas, the 10-years management plan of the Belovezhskaya Pushcha National Park-Belarus (European Diploma site) (T-PVS/DE (2009)15).

1.2 The Consultant undertakes to submit to the Council for editing the final version of his report not later than 30 November 2009.

(2) Documents available

- (1) **tpvsde15_09_eng: Management plan for Belovezhskaya Pushcha National Park (Belarus) Expert report by Ms Lyudmila DIMITROVA (Bulgaria)** presented in March 2009 at the Group of Specialists, European Diploma of Protected Areas (an electronic version was received 27.11.09)
- (2) **THE MANAGEMENT PLAN National Park "Bielovezha Pushcha»** 2 parts, pdf, *in Russian* (received 8.12.09) (the **annexes** are not included) the date of the plan is unclear: 2008.
In this report we refer to the plan as 'MP2008'
- (3) **FEASIBILITY AND TERMS OF REFERENCE FOR THE MANAGEMENT OF THE BELOVEZHSKAYA PUSHCHA NATIONAL PARK** (document 'ManPlan' COE, summer 2008) (received 10.12.09)
- (4) **T-PVS/DE (2009) 20 inf: Non renewal resolutions of Bialowieza National Park and Belovezhskaya Pushcha National Park.**
presented 2-3/03/2009, Group of Specialists European Diploma of Protected Areas
- (5) **The situation of 2 European Diploma sites: Bialowieza and Belovezhskaya Pushcha National Parks:** e-mails between UNESCO and COE (Françoise BAUER), dated 5 and 10/11/2009
- (6) **Official letter to the Council of Europe Strasbourg**, signed by Heorhi Kazulka, Valery Dranchuk, Inessa Zenina & Vladimir Datskevich. Dated 20.11.2009.
- (7) **Annual report Belovezhskaya Pushcha National Park for 2009**
- (8) **"The Forest of Hope Appeal" Summary of the reports of the expert working groups.**
Prepared by Onno de Bruijn (Vereniging Natuurmonumenten, the Netherlands); August 2006

(3) General situation and zoning of Belovezhskaya Pushcha National Park

The situation in 2006 represented following zones: figures in ***bold and italics*** are from Management Plan 2008

- (1) wilderness protection zone, incl. World Heritage Site (30.000 ha) ***30,679***
- (2) regulated nature zone (52.782 ha) ***57,318***
- (3) regulated recreation zone (6.140 ha) ***7,739***

- (4) economic activity zone (74.583 ha) **57,226 ?**
- (5) game forestry zone 'Shereshevskoye' (10.000 ha)
- (6) support (buffer) zone (90.000 ha; 60.000 with regulations)

→ For first 3 categories new figures are presented in MP 2008, showing increase of protection zones and recreation area; the figure for economic activity zone is not clear from the Russian text.

→ New functional zones allocation are announced in the annual report 2009 indeed and are envisaged within the actual Management Plan; the realisation needs adaptation of legal decisions.

II. Introduction to the peer review

(1) The basic recommendation under the European Diploma of the Council of Europe :

Establish and implement a peer reviewed 10 year management plan for the Belovezhskaya Pushcha National Park, including the adjacent zones with internationally recognized nature values, and taking into account, among others, the conclusions of the "Forest of Hope Appeal";

A group of scientists, including the National Park representatives and the representatives of various scientific organizations have elaborated a Plan of managing the National Park for the period of 10 years.

The Plan has been endorsed by the expert appointed by the Committee of the Diploma of the Council of Europe (Mrs L Dimitrova, Bulgaria), have been endorsed at the government level (Ministry of Natural Resources and Environment Protection) and approved, whereupon was sent to the Council of Europe for a final expert evaluation. During the current year the management plan implementation have started.

(2) In the document *tpvsde15_09_eng*, L. Dimitrova specifies the work done to support the successful preparation of a Management plan for Belovezhskaya Pushcha National Park and the outputs as follows:

In co-operation with the Administration of the Park, the mission took place in the period 15.09-15.11.2008:

1. To check the elaboration and structure of the draft management plan prepared by the Administration of the Park;
2. To verify that the proposed management plan complies with European standards' requirements in the field of protected areas management and corresponds to the protection requirements of the Park;
3. To prepare the final interim plan (action plan);
4. To develop the vision and objectives of the Management Plan.
5. Provide a Mission Report by 15th November 2008 outlining activities undertaken and providing a series of recommendations.

The report *tpvsde15_09_eng*, by L. Dimitrova has the following contents

1 ACTIVITIES UNDERTAKEN

- 1.1. Meetings with stakeholders and MP staff
- 1.2. Workshop on the structure
- 1.3. Workshop on the vision development
- 1.4. Workshop on the Interim /action plan preparation

2. PROBLEMS AND ISSUES IDENTIFIED

3. RECOMMENDATIONS GIVEN

ANNEX 1 Reference for Implementation of MP Structure

ANNEX 2 Interim/action plan – final version

→ In this peer review, we mainly envisage the evaluation of the follow-up given to § 1.3: vision development.

§ 1.3: vision development:

- (1) What the National park will be like in 20 -30 years
- (2) Local, national and international conservation principles and standards.
- (3) What is good to be conserved and how it will be safeguarded and improved.
- (4) Socially, economically and environmentally aspects of the use of resources
- (5) How the site can contribute to the improved welfare of local people.
- (6) Strategic management principles which are unlikely to change

Results – The Vision will be developed based on existing information. The core team will prepare the interview format and will summarize the results into the Management plan.

Annex 1 to this report **tpvsde15_09_eng**, presents: **Guide for Implementation of MP Structure**

➔ In this peer review we compare the final management plan (MP2008 Russian version) with these guidelines.

(3) Finally, the report *tpvsde15_09_eng* formulated the following RECOMMENDATIONS (Annex 1)

Structure of the Management Plan:

- (1) Restructuring of the descriptive part according the interim plan (Annex 2).
- (2) The existing and approved national “Law for the “Belovezhskaya Pushcha National Park» have to be the base for the directive part of the Management plan.
- (3) The descriptive part is to long and contents information not necessary for the operational work of the Park Administration. It should be clearer, if possible in table form. The detail information can be completed as an annexe to the MP (Annex 1).
- (4) The National Park, like any big protected territory, represents a unique laboratory in the open for diverse scientific studies on regional, national and international scale. Some of the scientific projects proposed in current version of the MP2008 can be listed without details. They may be implemented if funding is ensured anytime during the period of action of the Plan, but they are not priority for the management of the park.
- (5) All funded programmes and projects should have as a success criterion, the economic and environmental sustainability of enterprises and activities established.

(4) The translated Management Plan (“FEASIBILITY AND TERMS OF REFERENCE FOR THE MANAGEMENT OF THE BELOVEZHSKAYA PUSHCHA NATIONAL PARK”) (doc ‘ManPlan’)

This document is not a strict translation of the management plan and follows a different order of chapters. It is not dealing with the Policy part of MP2008 neither. We do not recognise the author of this report, nor the date. However, it is important to mention its main objectives.

The management Plan in particular seeks:

1. To restore and preserve the authentic “mosaic” of the Park’s landscapes, animal and vegetation communities, first of all by restoring natural hydrological processes.
2. To provide for rehabilitation of natural processes in old woods, ensuring their long-term regeneration in the historic area of the Pushcha following the increase of its protected status.
3. To restore and maintain the Pushcha’s authentic biocenotic structure, through a combination of conservative and active protective measures, including rehabilitation of indigenous species at risk, and restriction of alien and aggressive ones.
4. To develop and implement actions for conservation of rare and endangered flora and fauna habitats.
5. To restore and maintain the necessary level of succession on lowland bogs, ecologically connected with large woodlands.
6. To reduce the impact of the recreation activity in the Park.
7. To optimize hunting and fishing activity.
8. To improve the monitoring of ecosystems and biodiversity elements, particularly old forests, as well as the effect of bog reclamation.
9. To raise awareness of the population in the national park area with regard to conservation and management policies.

The doc ManPlan discusses items in the following subdivisions:

1. Feasibility
2. Terms of reference:

3. Existing challenges, their origins and possible solutions

3.1 Degradation of the hydrological regime in the past

3.1.1. Artificial transformations of streams and rivers

3.1.2. Decreasing ground water level (GWL) as a result of bog reclamation both in the Pushcha and adjacent territories

3.1.3. Decreasing GWL as a result of creation of artificial water reservoirs

3.2 Degradation of flora

3.2.1 Dynamic processes in Norwegian spruce-containing woods

3.2.2 Non-regeneration of pine in pine woods

3.2.3 Non-regeneration of oak (and of some other species) in old broadleaved woods

3.2.4 Disrupted succession in ash-containing woods as a result of drying

3.2.5 Non-regeneration of sessile oak (*Quercus petraea*), decreasing quota of some rare species

3.2.6 Remaining isolated populations of the white fir (*Abies alba*) threatened

3.2.7 Shrinkage of oligotrophic sphagnum pine woods as a result of their transformation

3.2.8 Spontaneous expansion of invasive alien species supplanting indigenous vegetative communities

3.3 Threat to indigenous animal populations

3.3.1 Isolation of big ungulate (i.a. bison) populations in the Belarusian and Polish parts of the Belovezhskaya Pushcha

3.3.2 Overpopulation of ungulates as a result of intensive biotechnical methods

3.3.3 Carnivores-related challenges: the wolf

3.3.4 Decreasing grouse (*Galliformes*) populations

3.3.5 Diminishing population of aquatic warbler (*Acrocephalus paludicola*) as an indicator of lowland bogs condition

3.4 Recreational use of the Pushcha territory

3.4.1 Risks arising from tourist and recreational activity

3.4.2 Damage to and pollution of nature as a result of environmental law violations.

This English summary (?) is a good compilation and presents specific points of view

(a) good ecological knowledge and considerations;

(b) objectively represented facts

(c) far-reaching recommendations are expressed

→ The paragraph on recreation and hunting seems more incomplete and unsatisfactory.

→ In this document no reference is made to an enlargement of the strictly protected "wilderness zone" (highest protection area). This would be the most important positive development of the last 5 years.

III. Preliminary Review of the Management Plan

(1) Comments on the overall structure of the MP 2008

→ Comparing the content suggested in *tpvsde15_09_eng* and the structure of the MP 2008, we can confirm that most of the items have been duly described. The order of some sections has been altered, but this is not causing problems.

A wide variety of data is presented, many of them summarised in tables. However, the origin of these data is not always clear (but probably to be found in the Annexes?). Thus the evaluation of their scientific quality remains difficult.

A remark was mentioned by Dimitrova in *tpvsde15_09_eng* that some of the descriptive parts are too long and the relevance of some details was questioned. The advice to bring together data in Tables has been followed quite well. We appreciate that as much available data as possible were summarised in tables, as this will make comparison with future developments more accurate.

(2) Comments on the content of different sections in MP2008

A. The descriptive sections in PART 1

1. General information

2. Chapter Physico-geographic terms

3. Chapter Biotic Characteristic, Vegetation, Flora. Fauna

Here valuable and relevant information is presented in a 'classic' subdivision of items. The abiotic basic data are most relevant. We especially appreciate that hydrology, hydrographical networks and ecological effects of changes in water regimes in the surrounding landscapes are described in detail. These changes caused the most dramatic deterioration of ecosystems indeed, also in the strict protected zones.

The vision to restore, mitigate or compensate these losses (future measures?) needs this scientific underpinning very much. We hope that the political will is present to effectively change some negatively influencing effects from the surrounding economic land-use.

In the description of Biota (esp. § 3.2 and 3.3) important attention is paid to flora and fauna in an ecological context. However, some relations of human interventions (direct or indirect) are probably subject to determined assessments, rather than pure and objective scientific facts and correlations. Distribution of tree species abundance and rarity is interesting, but the typology of soil vegetations is mostly as important as bio-indicator of habitat quality. The interest in the tree-layer of the forest habitat reveals that forestry is considered as a most basic interest, rather than nature conservation as such. Especially statements on all activities related to forestry are to be carefully reviewed later (with English translation).

The same holds for sections on population regulation of large mammals through hunting. The relation between grazing of animals and natural regeneration of forests can be differently interpreted following different statements and experiences expressed in a wide variety of literature. Notably the role of parasites and diseases (bark beetle) and the management of forests affected by this plague is controversial. Interesting are statement on changes of forest compositions as a result of drying and of grazing.

Apart from the detailed description of forest vegetations, the utmost importance of peat bogs, marshes and related habitats gets relevant attention and duly descriptions indeed. Here the hydrological changes cause direct losses in biodiversity more rapidly and large-scale restoration measures need priority. Ecological succession is rapidly disturbed and causes loss of vulnerable and rare habitats. Therefore it is relevant that description of different plants species groups is included (also fungi and mosses etc.)

Among the fauna elements large herbivores and carnivores receive most attention, as well as some important bird species, fish, amphibians and invertebrates (the latter groups, esp. insects are quite well investigated and represent important bio-indicators). However, the number of species mentioned as indicators ought to be extended explicitly with much more priority or red data flora and fauna elements. We appreciate the presentation of distribution maps, long-term population change graphs etc. as a useful basic information. Here the discussion on ecological mechanisms and on hunting as a population regulation measure and in function of recreation (*trophies!*) is most relevant but sometimes difficult to present in an objective way (in most countries hunting bag statistics are not always reliable).

The chapter 4 presents information on socio- economic aspects and cultural history. Important data are collected on the economic importance of logging, illustrating this function of large areas of the forest. With a new saw-mill installed at Kameniki the need for intensive cutting increased, and we have the impression that this determines the volume of removed trees much more than the ecological management needs. Fight against bark beetle still seems to be used as a pretext for cuttings, even in old grown forests parts that deserves full protection.

Some sections follow on agriculture, road and transport network amelioration, local settlements and human population. Unfortunately the utmost negative effects of the fast pavement (asphalt!) of rural tracks are not mentioned or evaluated, although it is clear that this will soon disturb even the most remote parts of the forest. Extensive historical description is brought together in § 4.4: History of environmental management in the territory of the Pushcha.

This information is interesting but is not so much relevant for the nature management plan s.s. at this stage ? However, archaeological objects and some data on tradition of forestry can explain later choices for management in view of respecting such values indeed. This aspect of traditional landscapes and human communities in relation to natural environment is a most valuable subject of ecotourism, but it is extremely difficult to maintain authenticity with increasing visitors in remote settlements.

The importance of the long-term scientific research is well illustrated and the function of the Belovezhskaya Pushcha as an open field laboratory is stressed. The results of manifold investigations are quite impressive and represent a firm basis for future management options indeed.

The Chapter 5 on evaluation of the old grown forest as a management object in an international context shows the importance at European and even global level. Several aspects discussed above are summarised and reveal some motivations for priorities that the authorities give to the National Park: restoration of hydrology, maintenance of forestry functions and hunting activities, fight against exotic species, protection of rare and vulnerable habitats etc.

In some sections of this chapter the goods and services delivered by the National Park as an ecosystem are discussed. They deliver an important argument for well planned conservation, but the amount of disturbance by the economic use of these goods and services probably needs more careful analysis. How far can functions such as intensive tourism (Manor of Father Frost, Hotels), agriculture, hunting, fishing, collecting mushrooms etc. continue when situated in the core areas of ecosystems that need careful protection?

Relocation of some activities (Manor!), volume of logging and other actual priorities must become subject of discussions and considerations for ecologically sound long term management. Also ecotourism needs to get restrictions, if not the line of least resistance will soon overtaking nature conservation interests!

The paragraphs on rarity and vulnerability of representative ecosystems clearly show the risks for neglecting the carrying capacity of the forest as a whole. Fortunately attention is also paid to education as a driving force for changing human attitudes towards nature and in raising awareness among the local population.

Most important and relevant is **Table 5.3** at the end of Part 1: the annotated listing of the elements or habitats that are of European importance, referring to the European Habitat directive.

So far the descriptive part 1.

B. The Policy part of the Management Plan 2008

The evaluation and peer review of this part remains difficult, as the translation into English is lacking.

The Policy part of the MP 2008 has a few chapters, dealing with:

- Vision and long-term objectives
- Directions for implementation of projects
- Adjustment of functional Zoning
- Bottlenecks for achieving objectives

Follows a discussion on the Working Plan 2010 and references to literature and documentation.

Chapter 6 & 7

The way this Policy part 2 is worked out is clear and interesting because it is based upon the standardised presentation and ecological viz. social and economic evaluation.

However, the need for different and adapted management tools for a sustainable maintenance of the whole ecosystem in its historic diversity context needs more elaboration. Also the goods and services for most items are discussed, causes and consequences or implications are summarised, and possible actions mentioned. Again some warnings and broader outline is needed to prevent that 'improved use' is not developing into 'over-usage' of the Belovezhskaya Pushcha.

Five important **long-term objectives** are formulated:

1. Conservation of the natural heritage of Belovezhskaya Pushcha
2. The development of sustainable recreation and tourism in the region of Belovezhskaya Pushcha
3. Development of scientific research on forest and wetland reference ecosystems and their components (→this is very important, but how independent are scientists in expressing their findings, visions and conclusions?)
4. Formation of ecological consciousness among official residents and visitors of the National Park
5. The search for sustainable use of stress ecosystems of Belovezhskaya Pushcha and their implementation in practice of work for the local population

For each long-term objective a number of specific tasks or 'tracks' is clearly listed.

→ The completeness of this approach could not yet be assessed but we probably miss the discussion on lowering forestry, fishing and hunting pressure and the considerations on relocation of activities with high ecological impact. Potential (economic) values and constraints are dealt with in separate sections.

Chapter 8 discusses 'Adjust functional zoning'

Because of its integrity and heterogeneity, historical parts of the forest needs the consistent application of conservation measures, despite anthropogenic transformation in the past and disturbances caused by natural factors. This statement is used to consider different zonation for the forest, announcing that the status of wilderness cannot be given to a very large extend (unless the 'Forest of Hope' appeal).

Fig 3.1 gives future zonations, but comparison with the actual situation is still to be assessed, depending on the description of rules in each separate zone.

Unfortunately, it seems that the great need for a further significant extension of the 'wilderness zone' (after the 2004 decision) is replaced by extending the 'nature regulated zone', which means that here nature is not the first aim, but again forestry interests can prevail under the cover of so called conservation. Again more clear and strict ecologically sound guidelines are essential.

Chapter 9 (Directions for implementation of projects)

We cannot evaluate if principles and basic visions from previous chapters are fully respected in this approach. We see that again logging gets specific attention, which is comprehensible as a source of income, but we have no sight in which way this income is used for sustainable conservation.

Chapter 10 discusses the operative work plan for 2009.

The present work plan includes activities which are scheduled for implementation as of 2009.

It concerns long-term objective 1, 2 and 4 but does not indicate the operations at the real long term (5 or 10y).

Chapter 11

Assessing the final considerations on monitoring, reporting etc. needs a full translation of this section.

IV. Comparison of the Management Plan and the Framework proposal (document tpvsde15_09_)

As far as we can evaluate by lack of detailed translation, the items to be discussed and the order of those items as suggested in the report **tpvsde15_09** is fairly respected, including the last chapter which gives an analysis of the results of the implementation and revision of this management plan scheduled at the end of 2013-2014, taking into account that the revised management plan covers the period from 2014 - 2018.

How far the long-term aims and principles from part 1 are duly recognised in the practical approach in annual or short-time planning is to be discussed when translation is available.

V. Concluding remarks

(1) In general it is not yet clear how far the authorities will or can ensure the realisation of the long-term objectives and specific actions elaborated in MP2008. This needs considerable and specific **budgets** based upon 'translation' of assessed costs for each task or action. Although the income from some activities has been evaluated, it is clear that the management of the National Park is not self-supporting.

An overview of the budget is presented in Table 1, together with some comments. (Annex

(2) we were not able to evaluate the management plan as a whole, because this needs a complete translation; even when only summaries of each chapter could be presented, we then could finalise the requested peer review on a more appropriate basis.

(3) at the time of signing the contract for this peer review, we were expecting a doctors degree student from Belarus at Ghent University, who could assist in translation. Unfortunately, the project was cancelled mid-November, before we got the original Russian version of the Management Plan. We helped ourselves by automatic translations via internet (unclear and very time consuming!), but technical terms could not be recognised at all.

(4) the Management plan of 245 pages has also a number of Annexes (at least 20) that we did not receive and of which also the list of contents is missing .

(5) We are not yet able to formulate well-grounded proposals for recommendations; as agreed by the secretariat, this could be the result of our consultations with mrs L. Dimitrova and mr O. Biber.

In order to maximise the input of questions and viewpoints we include in Annex 4 information received from other colleagues and references to internet. In annex 5 we summarise some further personal questions and comments for the discussion..

VI. ANNEXES

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Annex 2: Budget Table and comments on the proposed estimates of expenditures

Annex 3 Official letter to the Council of Europe Strasburg, 20.11.2009 by Belarus stakeholders

Annex 4 Further experts' questions and comments for discussions with Olivier Biber and Ludmila Dimitrova before finishing the review report

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Structure and contents of the plan

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- 1.2. Fund and administrative affiliation
- 1.3. Legal status
- 1.4. Ownership
- 1.5. Management structure
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CHARACTERISTICS OF THE ABIOTIC FEATURES

- 1.8. Climate
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BIOLOGICAL FEATURES

- 1.12. Vegetation and habitats

- 1.13. Forest tree vegetation

- 1.14. Flora

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CULTURAL AND SOCIO-ECONOMIC CHARACTERISTICS

- 1.16. Usage of the park and socio-economic aspects
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PART 3 ZONING, NORMS, REGIMES, AND RECOMMENDATIONS
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3.2. Regimes and norms

PART 4 OPERATIONAL TASKS AND PRESCRIPTIONS
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4.2. Operational tasks
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PART 5 MONITORING AND REVIEW OF THE MANAGEMENT IMPLEMENTATION
5.1. Review of the goals
5.2. Review of the tasks

Annex 2: Budget Table and comments on the proposed estimates of expenditures

The budget as represented in Table 1 below gives five purposes or headlines (1-5) for the future of the National Park, followed by the policy aspects (6) on long-term objectives, repeating those aims. Each of these items are grouping subdivisions, for each of which a budget is mentioned.

From these figures it becomes clear that an effort will be undertaken for the future management of the NP, with a total amount of **34920 million BYR** (equivalent to **8.680.431 €**).

Looking at the relative repartition of those budgets expressed as percentages, most strikingly is that almost 75% goes to tourism and recreation development.

- 1) Conservation only receives 12%, including the 6% for technical support (an extra 3,7% is for a study of mammal introduction: Brown Bear and Tarpan).
- 2) Tourism and recreation receive ¾ of the total budget(!), which indicates the great risks for developments that will override the carrying capacity of the NP and its surroundings.
- 3) Research items are restricted to 5,4% with on top the 3,7% to be added for introduction studies; this ratio does not seem very justified as so many aspects of unique biodiversity need thorough studies and species introduction is only of subordinate importance (or even to be excluded)
- 4) Social aspects only receive 2% of the total budget ; changing human attitudes with respect to nature and environment needs consistent long-term education, specific actions at a broad basis, which needs much larger budgets
- 5) Sustainable use actions only are worth less than 1%; with this amount the badly needed 'alternative' agriculture with respect to the nature values present cannot be encouraged at all.
- 6) Development of special protection measures is considered of minor importance and receives <1%!

In conclusion, we must summarise the following remarks:

- With a total National park area of 152.962 ha, this budget is far too low for making real progress in conservation, as this only represents on average 228.292 BYR/ha or an equivalent of 56,75 €/ha (or 83,2 CHF/ha)!
- When 75% of the total budget would be exclusively spent on tourism outside the wilderness zone, a total area of 122.283 ha will receive support of 214175,3 BYR/ha, an equivalent of 53,2 €/ha (or 78,0 CHF/ha)
- We do not know if these figures represent annual expenditures or total budgets for 5 years.
- The proposed division among the chapters mentioned is not representing the priority needs for nature conservation of the NP:
 - o the majority of funds will be spend on development that are only justified at a limited and rather local level, taking into account the vulnerability and unique ecological value of the NP and its surroundings
 - o in this budget, there are no figures given on income from forestry, hunting and fishing; these income need to (partly) return to the conservation needs of the NP;
 - o even more: the diminution of income from traditional or modern forestry is to be compensated through important temporary funding of adapted economic activities
- The most important priority is restoration of hydrology: the budgets listed are not at all in line with the expected needs and the secondary social aspects (e.g. relocation of agriculture)
- It is not clear if specific labour costs (management staff, wardens, scientific personnel, educational staff etc) is included in the budget table (post 1.6 ?); this must be clearly specified as a separate item.
- We miss specific priority projects worked out with realistic budgets. We therefore again refer to the conclusions of the 'Forest of Hope Appeal' in which priority actions are described which were agreed by all stakeholders.

(see budget posts and figures in Table 1 below)

Table 1

BUDGET Belovezhkaya Pushcha		
1. Protection of the natural heritage of the Belovezhkaya Pushcha	Million rubles	%
1.1. Restoration and support of the natural hydrological regime:	425	1,2
1.2. Restoration and support of the natural structure of the original natural communities of the forest:	240	0,7
1.3. Conservation and rehabilitation of the important, rare and endangered indigenous species (incl. 1300 for the study of potential introduction of the Tarpan and Brown bear)	2275	6,5
1.4. Development and functioning of an effective system for the monitoring of ecosystems and the main components of the environment	455	1,3
1.5. Upgrade of the international protection status of the Belovezhkaya Pushcha	55	0,2
1.6. Material-technical support of the management services and entities	2100	6,0
2. Development of sustainable recreation and tourism in the region of the Belovezhkaya Pushcha		
2.1. Development of a tourist product	50	0,1
2.2. Development of tourism infrastructure	25730	73,7
2.3. Informational and methodological support of the tourism	800	2,3
3. Development of scientific studies on the forest and wetland ecosystems and their components		
3.1. Organisation of studies on the ecosystems of the Pushcha, their components and environmental factors on a modern scientific and methodological basis	1020	2,9
3.2. Publication of scientific and vulgarizing literature on the Belovezhkaya Pushcha	860	2,5
4. Raising ecological awareness and a cautious approach to the natural environment, to interested parties, including the local population and the visitors of the National Park		
4.1. Strengthening of contacts between the National Park and the Community:	30	0,1
4.2. Increase of the environmental awareness of the interested parties	325	0,9
5. Find ways for a non-exhaustive use of the resources of the Belovezhkaya Pushcha ecosystems and their implementation in the interests of the local population		
5.1. Sustainable agricultural practice in the region of the Belovezhkaya Pushcha	60	0,2
5.2. Sustainable purchase of non-wood products	95	0,3
5.3. Restoration of traditional crafts	50	0,1
5.4. The mark Belovezhkaya Pushcha	50	0,1
The policy part		
6. Objectives and long-term challenges		
6.1. The system of special protection measures:	300	0,9
Total budget	34920	100,0
EURO conversion	8.680.431	

Annex 3 Official letter to the Council of Europe Strasbourg, 20.11.2009 by Belarus stakeholders

Official letter to the Council of Europe
Strasbourg, 20.11.2009

Dear Ms. Francoise Bauer,
Dear experts, colleagues, and friends!

Environmentalists and democratic public of Belarus and residents of the area of the National Park "Belovezhskaya Pushcha" are deeply concerned for many years about the situation on a European Diploma to the national park. We, independent experts and local activists who subscribed to this letter, consider the Diploma as a very important tool to stimulate nature protection and to regulate the management in Belovezhskaya Pushcha. And we actually see some positive results in nature protection getting from the Diploma's recommendations, especially from the procedures on its renewal.

The previous year and especially this year gave us, independent Belarusian public activists, small but good hope for the better future of Belovezhskaya Pushcha (Bialowieza Forest), a World Heritage Site and the natural treasure of Belarus. It first of all concerns the chance given us radically to change the unscientific and bad forest management in Belovezhskaya Pushcha causing a big damage to the natural ecosystems of the primary character. This chance is given due to the situation around the Diploma's renewal which was postponed a few years ago for the period until all recommendations will be done in full measure.

Last year and this year **we did appreciate the information** that the first draft management plan for the national park and the draft outlines for the near years finally appeared and got publicly accessible. We consider it as a very important step to achieve understanding and to make a big progress in the field of nature and biodiversity conservation in Belovezhskaya Pushcha. This is because there was no many-sided and scientifically-well management plan in the national park before. We see that the big work was done and many experts and bodies took part in preparation of the management plan. Our analyses revealed that the management plan covers many important issues of nature conservation including the most dramatic problems in the Belovezhskaya Pushcha forests and, in general, it is good-made. Of course, some points are discussible, ambiguous and even discrepant. Nevertheless, they are not considered by us as more important as the fact of preparation of the management plan in itself. So, we suggest that this management plan can be accepted by the CE experts after making some remarks for its improvement.

However, **we are warring very much about another thing**, whether this plan will be a real tool for implementation and improvement in the style of management in Belovezhskaya Pushcha, or it will become only a "dead-paper" to make "the colourful façade" and to cover the existed miss-management and adventurism in the forest.

Unfortunately, many events happened during this and last years give us many arguments to think that the future can be as described just above, not as the best international practice.

First, at a glance, the devised changes look reassuring so much as the announced openness of the authorities to informal discussions of the management plan and its main objective in particular. Yes, some few elements of the public discussions were done and the draft management plan is accessible for the public from some websites. But they were only some elements, not the whole package. It is because the mechanism of public participation is opaque and the procedures unclear. Moreover, the park's administration made everything including uncivil acts against unwanted nature protection activists and experts to block their participation in the public discussions, for example, against Heorhi Kazulka, PhD, expert and local resident, by force to remove him from the hall where other public and governmental participants assembled for discussions in the summer of 2008 (<http://bp21.org.by/en/art/a081030.html>).

This year proved to be "rich" for the similar incidents when the public nature protection activists and experts were forced to leave public and scientific actions organised in the national park. The park's guard has ordered to the publicist Valery Dranchuk to move from the park's hotel and to leave the park's administrative center after he arrived and rendered informational assistance for the participants of the open-air painting "600-Bialowieza" (<http://bp21.org.by/en/news/0809.html#8>). In September of this year, on the eve of the celebration of the 600th anniversary of nature protection in Belovezhskaya Pushcha, Heorhi Kazulka, scientists, PhD of biology, was forced to remove the hall where other scientists all over the country and abroad assembled for the

scientific conference (<http://bp21.org.by/en/news/0909.html#34>). And on October 3, in the day of the 600th anniversary, Heorhi Kazulka and the local active pensioner Vladimir Gaevskiy, as preventive measures, were detained and isolated for a time of the official celebration with participation of the President and other high-ranking officials (Heorhi was delivered to the district police office, while Vladimir spent time in a police car next to the parks administrative center).

Second, the celebration of the 600th anniversary of nature protection in Belovezhskaya Pushcha has been turned to the grandiose national event (<http://bp21.org.by/en/news/1009.html>), for which very big budgetary funds (~\$ 30 million) has been appropriated and many works on construction and reconstruction of the national park's infrastructure have been done (<http://bp21.org.by/ru/docs/600aniv.doc>). There were also lots of promises to improve the management in Belovezhskaya Pushcha. The greatest one was to enlarge the strictly protected core of the national park, the Wilderness Protection Zone, from 30,000 to 70,000 or to 100,000 hectares in order to cover the whole area where the unique primeval forest grows and to date it for the 600th anniversary in 2009. The celebrations are over but **this promise proved to be false** as the situation with the zoning remains to be unsatisfactory, like before, and it is unknown what was done to change it. Moreover, a number of letter-inquiries for environmental information pursuant to the Aarhus Convention, including the core zone's issues, were sent, but the national park ignored these, pointing out that the park is not a state institution to provide the public with environmental information (!).

Third, instead, a wide-sounded false propaganda about the 600th anniversary of establishing of the reserve status, not nature protection as it is true, disseminated this information and covered all the state media there and everywhere (<http://bp21.org.by/en/docs/600white.html>). Why? This policy targets to disorientate the general public concerning the real situation of nature protection and conservation in Belovezhskaya Pushcha and to make the illusion "all things are well here" (that's why the general director announced "There are no problems in the national park today" during the press-conference in Minsk on September 23, 2009 (<http://bp21.org.by/en/news/0909.html#32>)).

Forth, the objective of the management plan, as we can suggest, is to end irresponsible exploitation of natural resources of Belovezhskaya Pushcha within hundreds of years, recreate systems of lost biodiversity, and make wild nature in the area fully protected. Good intentions, but they are likely to become empty words without involvement of independent monitors in the process and without public influence upon the administration of the National Park "Belovezhskaya Pushcha", especially in the case of Belarus.

Many evidences of the last years demonstrate the real situation in the national park and disclose the facts that fears of public activists have a firm basis. During last years a number of irresponsible projects which cause damage to the intact wild nature of Belovezhskaya Pushcha and are very dangerous for the future of the Bialowieza Primeval Forest as a whole complex are observed. For example, these are:

- Creating a hunting enclosure in the Pashukovskoe forest area, 2007-2008 (<http://bp21.org.by/en/ff/600foto28.html>);
- An attempt at creating a large new water reservoir in the Lesnaya River floodplain and large-scale alteration of the floodplain landscape, 2007-2009 (<http://bp21.org.by/en/ff/600foto23.html>);
- Large-scale and ecologically wrong cuttings in the old-aged Bialowieza Primeval Forest, 2001-2009 (<http://bp21.org.by/en/ff/600foto29.html>);
- and some others (<http://bp21.org.by/en/ff/>) including many those to be shown at the website a bit later.

The fact is that the park's administration ignores all letter-inquiries for information about the above issues and projects, pursuant to the Aarhus Convention, pointing out that the park is not a state institution to provide the public with environmental information or keeping silence at all.

We sent our proposal about this to the Council of Europe two times already: first, in November 2007 (<http://bp21.org.by/en/docs/doceu02.html>), and then in March 2008. Our suggestion to the Council was to work more closely with independent public initiatives in Belarus concerning the Aarhus Convention implementation and democratization in the Belovezhskaya Pushcha National Park. With regard to nature conservation, we highlighted, above all, the necessity to condition the approval of the European Diploma for Belovezhskaya Pushcha on stricter fulfilment of its requirements and recommendations. We also stressed that the authoritarian, autocratic and dictatorial methods of management, which are practiced by the administration of the national park over decades and thus severely impede the progress in conservation work, must be abandoned and blocked

To our regret, we have not yet received a proper reply to our initiative from the Council of Europe. We do not know if our position has been considered, if our suggestions have been discussed by the Council's Committee of Ministers and the administration of the national park during the recent talks in Strasburg and in Belovezhskaya Pushcha. Finally, we do not know if the Council of Europe is interested in our independent opinion on the situation with nature conservation in the national park. Therefore, we would like to have a meaningful response from the Council of Europe to our previous two calls, and especially to this letter, before explaining our position and vision upon the local situation to the Council in greater detail and before voicing our concern as to the future that the national park may be faced with.

Alone and in cooperation with each another, we have been working until now to push for a change in the situation with Belovezhskaya Pushcha. In our view, we have contributed a lot to bring about some of the good changes. The methods of administration and management of the national park, which previously had led to degradation of the unique primeval forest, has to be corrected. The status of Belovezhskaya Pushcha as protected area was reinforced. Authorities became more open with the public about wildlife protection issues not only in the national park, but in Belarus at large. The developments of the recent years, such as the enlargement of the protected area in the Belovezhskaya Pushcha National Park, discontinuance or a reduction in illegal and anti-ecological activities, the fulfilment of the European Diploma recommendations, and finally, the development of the current management plan - these can also be attributed to our impact and campaigning for protection of Belovezhskaya Pushcha. The administration is compelled to be accounted with our opinion

In September, 2009, the national park under the aegis of UNESCO has made a grandiose celebration, the 600th anniversary of Belovezhskaya Pushcha since first nature protection acts. This event has widely been covered at the international level. In this regard, all of us, the Belarusian public figures and activists, and international bodies involved and interested in it, got a great chance and opportunities to change the situation to a maximum extent. This concerns not only the attitude of the administration of the national park towards the CE Diploma recommendations but also to the clauses of the Aarhus Convention on public access to the ecological information, as well as to the observance of the human rights in the area of Belovezhskaya Pushcha. To achieve it and to use this chance, involvement and support of the international society including the Council of Europe was the indispensable condition.

Many changes took place regarding the infrastructure of the national park dated to the 600th anniversary. Unfortunately, a very few changes regard nature protection and conservation in the Belarusian Bialowieza Primeval Forest (<http://bp21.org.by/en/ff/>), and the public decision-making and democracy, as it was exemplified above with the relevant web-links.

We believe that the management plan for the national park, if developed with the proper involvement of an independent social initiative, will be more dynamic and rigorous in addressing the topical issues of nature conservation and protection in Belovezhskaya Pushcha. The independent watchdog can also ensure greater accountability of the authorities for disruption of the plan.

In this and above described regards, **we propose and do ask the experts, when approving the management plan for the national park and if renewing the Diploma for the next period, to do the exclusion from the rules, namely to renew Diploma for the next term of 2 or 3 years, not longer.** It means to give this term for the park's administration for implementation of the part of the management plan and again to inspect the national park in 2 or 3 years in order to check how well the management plan is executed and what progress in public relations is achieved. Otherwise, we are sure that the long-term prolongation of the Diploma can obviously stimulate the national park's administration further in keeping the policy on mismanagement and undemocratic development in Belovezhskaya Pushcha and in using the case of Diploma for propaganda only and for covering unecological style in the forest management (<http://bp21.org.by/en/art/a070000.html>).

Looking forward to receiving a reply from you this time, we thank you for your time and attention in advance.

PS. Since our power and public funds are very limiting, we had not enough time to prepare all web-materials as evidences. Please, visit the website <http://bp21.org.by/en/> next week and then later to see more new relevant information for the case discussed. Thank you.

- **Heorhi Kazulka**, ecologist, PhD of biology, coordinator of the Social initiative "Belovezhskaya Pushcha – 21st century" (international campaign for protection of Belovezhskaya Pushcha, <http://bp21.org.by/>), author of the books "Will Belovezhskaya Pushcha Be a World Heritage Site?" (<http://bp21.org.by/en/books/index4.html>) and "Belovezhskaya Pushcha protected and non-protected", author of more than 110 scientific and popular science publications on zoology, ecology, and nature conservation, FSC forest certification auditor for Danish "NEPCon", expert on the Ecological board of the Belarusian branch of the Helsinki Committee, one of coordinators of the working group "Nature and Wilderness Protection" of the Belarusian ecological association "Green Network", ex-deputy director on research and science in the National Park Belovezhskaya Pushcha, resides in the area of Belovezhskaya Pushcha, 16-years' work experience in the National Park Belovezhskaya Pushcha.

- **Valery Dranchuk**, Social ecological initiative "TERRA-Convention" (protection of landscapes in the international context, 2001-2009), publicist-ecologist, author of the books "Belovezhskaya Pushcha. Resolution: SOS" (2004) (<http://bp21.org.by/ru/books/index2.html>) and "My Counter-Points: Home and Overseas. National Parks and Wildlife Protection in USA" (2007), founder and chief editor of newspaper "Belovezhskaya Pushcha" (1995-2008), winner of the Henry Ford Premium for Cultural Heritage and Environment Conservation (1999), city of Minsk.

- **Inessa Zenina**, biologist, independent social activist for nature conservation, author of more than 70 scientific and popular science publications on zoology, ecology, and nature conservation, one of coordinators of the working group "Nature and Wilderness Protection" of the Belarusian ecological association "Green Network", teriology researcher and research assistant in the Prypiatsky National Park, town of Turov.

- **Victor Bakharev**, biologist, PhD of biology, senior lecturer of the faculty of biology in the Shamyakin's Mozyr State Pedagogical University, head of the research section on zoology of the scientific department of the National Park Belovezhskaya Pushcha for a long time, author of seven books and more than one hundred scientific publications, city of Grodno.

- **Vladimir Datskevich**, ornitologist, ex-director of the Museum of Nature in the National Park Belovezhskaya Pushcha, author of the book "Historical Review and Some Results of Ornithological Researches in Belovezhskaya Pushcha, 1945-1985" (<http://bp21.org.by/ru/books/index5.html>) and other publications on nature conservation, consultant and independent expert on wild nature protection in the Belovezhskaya Pushcha's area, retiree, lives in Belovezhskaya Pushcha, over 40 years of work experience in the National Park Belovezhskaya Pushcha.

Annex 4 Further experts' questions and comments for discussions with the Secretariat and with Olivier Biber and Ludmila Dimitrova before finishing the review report

1. The draw up of a management plan for Belavezhskaya Pushcha National Park was a main condition of the Council of Europe for eventual renewal of the Diploma. Some other recommendations (esp. on forestry and recreation) also reflected the greatest doubts about the compatibility of these activities with conservation of the ancient forest values.
Unfortunately we understand that authorities did not organise any public hearings on the management plan, as the Belarusian law does not mention such plans for protected areas.
However the procedure of public hearings in case of EIAs does exist in Belarus and it must be possible to use the same regulation for the broad discussion about the MP of the NP. We are convinced that a number of activities planned and described in the plan need a separate EIA, but the plan as a whole could be considered as a 'strategic environmental assessment report' (SEA) and as such could be subject to public consultation.
2. How can CoE require that the MP is implemented from the very first year? (even if only some actions are planned); or do we renew the Diploma without a control system?
3. In the first part the descriptions of the geographic, hydrologic and biologic characteristics seem quite detailed and probably as complete as possible. I mainly miss the references to the sources (where are data come from?) so I cannot assess the scientific quality of what is presented.
But my impression is that this is fairly good.
In most conservation areas, NGOs Work together with authorities, especially for monitoring of biodiversity. Did this happen in the case of this MP and could NGOs react on the final version of the MP?
4. The budget table clearly illustrates that the first aim of the MP is rather economic than ecological. Thus the good views and intentions of some chapters are to become side-aspects, rather than priorities ! (esp. hydrological restoration, which is expensive but indicated budgets represent only symbolic contribution). But I see that the descriptive part makes analysis of and stresses the very negative effects of rectification of watercourses, the drainage and bog reclamations in the past. As to the impact of actual agricultural activities and 'eco'-tourism the report is probably somewhat more cautious.
5. The most conflicting activities such as forestry and hunting are also dealt with and interesting figures on logging as an economic factor are presented. Also these figures are very difficult to evaluate. Especially the bark beetle 'problem' within a protected area remains a matter of discussion: in my view the 'sanitary fellings' can hardly been allowed and may certainly not become an excuse for cutting old grown forest parts. The critical analysis of forestry related activities influencing natural habitats is missed in the MP (e.g. logging/biodiversity; herbivore feeding =hunting purpose/regeneration of forest etc etc).
6. The extended Economic Activity Zone now covers probably 1/4 of the NP (it was only 4.5% before 2004)? Is this zone allowing to continue common forestry? The recent change of status in the NP is then very negative indeed!
7. What are the real restrictions for wilderness zones ? I miss a specific item on more ecologically friendly forestry and I did not see if guarantees are presented for non-interventions in the core areas.
It seems that control is almost unexisting.
8. As to hunting, the report seems to me very careful as well, with few data? We know that large herbivores are fed in winter (disturbing equilibrium in spring/summer) and that large predators are subject to hunting. Is it possible to accept these practices in the MP and renew the Diploma?
Even more: the MP foresees a budget 1600million BYR) for introduction of Tarpan-like animal and of Fallow Deer: both species are not authentic for the Forest and will disturb the equilibrium even more. This is called 'reintroduction' but hunting purposes are behind. (=important economic income).

9. I also understand from the chapter on roads and human settlements there are many roads improved (asphalted?); this can be the start of heavy touristic pressure on the protected area: is there any measure announced to counteract such development?
We have been informed that the NP has 4 official tourist routes, of which one is managed (the manor of Father Frost). Visitors from Belgium report on new roads that are destroying the forest but are intensively used for logging trucks (and hunters?).
10. My main question remains if these plans will be executed in due course: is there any concrete plan or political will to really change management in order to restore disturbed places (reclaimed bogs, artificially deepened lakes, relocation of Father Frost manor etc.)?
11. The management plan is extremely important for the NP but is the managing authority obliged to follow it? Further, management includes so many activities that it is probably unrealistic. As there is no prioritisation of activities, in practice especially (only?) the commercial activities are going to be subsidised (75% of budget for tourism!) . Priority and funding for urgent actions such as rehabilitation of rivers and peatlands is badly missing.
12. Because of strong signals is received from visitors and from my expert visit, I feel that renewal of the Diploma can only be considered after a period of 2-3 years. In that time, the NP authorities have to start priority actions (e.g. hydrological restoration), review the zonation and ensuring non-use of wilderness area. A prove of the implementation of the MP before deciding on the Diploma seems necessary seen the exceptional value of the NP and the manifold controversial activities inside and outside the zones with high protection status.
13. Finally I think we must propose a system of intensive review and public control ; preferrably a joint action for Poland and together with UNESCO for the World Heritage.