



Report on Deforestation in the Republic of Croatia

***Breach of Directive 79/409 (the Birds Directive) and
92/43 (the Habitats Directive), NATURA 2000.***

Author: Vesna Grgić

Zagreb, October 2020.



„VIDRA“- ASSOCIATION OF VETERANS AND SOCIAL ACTION

Trnjanska cesta 72, 10000 Zagreb, Croatia

OIB 90260251083

IBAN: HR5124020061100845708

e.mail: info@veteranividra.hr

GSM +385 95 925 3766

About us

„VIDRA“- ASSOCIATION OF VETERANS AND SOCIAL ACTION is a non-political, independent, non-governmental and non-profit association.

Its establishment was initiated by the veterans of the Homeland War and anti-fascists, with intention to gather all free-thinking citizens of the Republic of Croatia, not just from among the veterans' population or any other associations closely related to the Homeland War. The work and goals of the association have been also recognized by the young people who set up their Forum within our association.

Ever since its establishment, our association has been active in the struggle for improvement of civic freedoms and human rights, respect for diversity, equal treatment before the law, protection of threatened minorities and against discrimination of any sort, elitism, incitement to hatred and violence, criminal activities and corruption.

The Green Squad Forum branch of our association was established with the purpose of fighting for the preservation of the environment, nature and what is left of the forest resources in Croatia.

The chairperson of VIDRA Association and coordinator of the Green Squad Forum: Vesna Grgić

Contact: +385 95 925 3766

E-mail: info@veteranividra.hr

Address or Registered office: VIDRA Association, 10000 Zagreb, Trnjanska cesta 72, Croatia

Report on Deforestation in the Republic of Croatia

Breach of Directive 79/409 (the Birds Directive) and 92/43 (the Habitats Directive), NATURA 2000.

By joining the EU on July 1, 2013, Croatia became a member of the Natura 2000 ecological network.

The Decree on the ecological network and the competencies of public institutions for the management of ecological network areas (OG 80/2019) established the Natura 2000 ecological network of the Republic of Croatia, as well as the competencies of public institutions managing protected areas and ecological network areas for managing and adopting ecological network management plans. The Natura 2000 ecological network of the Republic of Croatia covers 36,67% of the land territory and 16,26% of the territorial sea and internal sea waters of the Republic of Croatia, i.e. 29,34% of the total area of the Republic of Croatia.

The Ministry of the Economy and Sustainable Development of the Republic of Croatia is responsible for strict compliance with and implementation of the Natura 2000 Directives.

The members and activists of the Green Squad Forum strongly believe that Croatia has been exposed to a widespread and joint criminal activities resulting in huge damage with immeasurable consequences to our woods as well as to the entire ecosystem. So far, we have resorted to all legal option in attempts to prevent further devastation, destruction of biodiversity, excessive logging and illegal management of the forests and forest land in Croatia.

We collected a great amount of documents, photographs and testimonies and, in the form of an official complaint, submitted them to the State Attorney's Office of the Republic of Croatia, the State Office for Prevention of Corruption and Organised Crime and the State Ombudsman's Office.

During 2018 and 2019 we sent open letters to Prime Minister Andrej Plenković and to the Speaker of the Parliament, Gordan Jandroković, where we explicitly proved that the plan for selling out of Croatian forests was designed at the highest places and has been implemented jointly by the Ministry of Agriculture, Ministry of Environmental Protection and Energy, Ministry of Construction and Spatial Planning, etc., thus confirming the fact that almost all ministers i.e. members of the RH Government in their respective departments are involved in the selling out of the Croatian forests.

Moreover, in 2019 we sent a very detailed report to the Forest Stewardship Council: Hrvatske Šume d.o.o. / Croatian Forests Ltd./ - a report on illegal activities and operation and violation of international conventions against perpetrators of years long deforestation in the Republic of Croatia.

Certificate Code: SA-FM / COC-001212

License Code: FSC-C015693

In the Report, we demand the immediate revocation of the license of Hrvatske šume d.o.o. with the stated and documented reasons why, in our opinion, the FSC should certainly do so.

In line with their plans and consent, Hrvatske šume d.o.o. are primary executors and perpetrators of ecocide. They operate in the following manner:

1. The primary document issued by the Ministry of Agriculture, which approved the General Forestry Holding Management Plan expired on 31 December 2017 and has not been renewed. Since then, Hrvatske šume d.o.o. are involved in illegal activities.

For more details check the page 47

Hrvatske šume d.o.o. have been forging for years the data on their business operations, which they are obliged to submit to our relevant institutions, but also to the EU institutions. Although the experts of the Green Squad have not yet completed their analyses, we have a reason to believe that in the past decade they have been concealing their losses 17 mil m³ which are likely to amount to one billion euros.

2. Hrvatske šume d.o.o. does not respect the priority of the supply of local population with firewood over favouring saw-mills, bio power plants, exporters, etc.
3. Hrvatske šume d.o.o. does not respect the regimes of management in the protected areas, such as nature parks and significant landscapes, ornithological reserves, the provisions of the ecological network Natura 2000, or FSC standards.

For more details check the page 53

4. Hrvatske šume d.o.o. perform excessive final logging of vast forest areas and major slopes. Landslides and erosions have been observed at several locations in RH. They are directly caused by the complete deforestation.
5. Hrvatske šume d.o.o. does not maintain order in the forests and the contractors who perform works leave behind garbage (sprays, fuel containers, plastic markings of the working sites, etc.).
6. Hrvatske šume d.o.o. does not keep in order the signs which mark forest sections/segments, thus enabling manipulations with the documents relative to planning and performing the works, and also plundering.
7. Hrvatske šume d.o.o. inflict serious damage to the trees close to the timber haul roads.
8. When entering into contracts with external contractors Hrvatske šume d.o.o. fail to inform them of the FSC or Natura 2000 provisions and does not require them to respect those provisions.
9. Hrvatske šume d.o.o. are rigging tenders and then allocating jobs to favoured contractors
10. Hrvatske šume d.o.o. does not respect the ISPIRE directives. Hrvatske šume d.o.o. charge for access to data, although the data are marked as public (e.g. section borders).

11. Hrvatske šume d.o.o. have been ravaging. Over the several past years, the forests have been increasingly and dramatically devastated, This year Hrvatske šume d.o.o. plan to fell more than forests' increment! *For more details check the page 49*

Please find attached a more detailed report on the devastated areas of Croatian forests in the regime of protection under Nature 2000. We would like to point in particular at the established disastrous deficit in timber stock as a result of the poor management of Hrvatske šume d.o.o. (Croatian Forests) over the past decade.

12. Hrvatske šume d.o.o. forged documents about the previous contents of forest sections/segments.

Example:

The area of Mt. Bilogora has centuries long tradition of biodiversity. As per order of the Ministry of Environmental Protection, Hrvatske šume d.o.o. committed deforestation of vast forest plateaus and ruthlessly removed linden, acacia, birch, wild cherry and many other fine sorts of trees as if they were plain weeds, leaving behind only commercially valuable wood, such as oak, beech and hornbeam.

(<http://natura2000.eea.europa.eu/Natura2000/SDF.aspx?site=HR1000008>)

(The tragic consequences are already visible among bees. The rate of sickness and death among them is growing and spreading rapidly. Apart from beekeeping, Bilogora has been known for centuries as a habitat of beavers. The devastation of forests also caused great damage to watercourses. As a result, beavers have been completely exterminated in that area.)

Reports provided by Hrvatske šume d.o.o. (Croatian Forests Ltd.) and the Ministry of Agriculture submitted to the EU institutions are usually incomplete and falsified with a false presentation of the situation in Croatian forests in order to cover up the brutal exploitation of timber, as well as years of increasing deforestation trend.

The following can be used as some of the evidence: satellite images showing huge forest bare areas, review of business documents of Hrvatske šume d.o.o. in which huge losses of wood mass are shown, in situ real time recorded material.

We are appalled by the proportions of devastation over the years, especially the last year, and the fact that this crime threatens to grow into an ecological disaster with tragic and unforeseeable consequences if not put to a stop.

Having closely analyzed the documents on business operations of Hrvatske šume d.o.o. related to Mt. Medvednica, we have discovered official data stating a dramatic deficit of timber stock per hectare, with the total deficit of approx. 330,000 m³ of timber stock worth about 14 million euros!

Mt. Medvednica is area covered by the Ecological Network Natura 2000.

Having analyzed over 3,000 documents collected so far about the business operations of Hrvatske šume d.o.o. (and these data is still incomplete), we are able to prove beyond any doubt the following:

1. Over just ten past years, Hrvatske šume d.o.o. generated a deficit in the timber stock in their custody amounting to approx. 17 million m³, which considerably exceeds the total three- year amount of permitted felling in the Republic of Croatia!

Although Hrvatske šume d.o.o. justify this disastrous deficit by shrinkage of the total woodland under their control, plant pests and natural disasters, it can be clearly seen in the documents that the total amount of timber stock per hectare is being dramatically reduced year after year. *For more details check the page 49.*

2. For two last years we have been witnesses of excessive felling of huge areas of healthy woods managed by Hrvatske šume d.o.o., whether or not protected by Nature 2000, under excuse of plant pests, with forged documents and without any, or with suspicious inspection control;

3. The authorized bodies: Forestry Inspection, the State Inspectorate, the Ministry of Agriculture, the Ministry of Environment Protection, the State Advisory Agency for Forestry and the Croatian Chamber of Forestry Engineers and Wood Technology – they have all been concealing the illegal operations of Hrvatske šume d.o.o..

4. Involvement of the former ministers of agriculture, as well as of both former and actual prime ministers in the planning of excessive felling, which has lately dramatically exceeded growth in some areas;

5. Scandalous conflict of interest – the Assembly of Hrvatske šume d.o.o is always presided by the actual minister of agriculture; Note: the Assembly of Hrvatske šume d.o.o consists of only one member – the minister!

6. Concealment of devastation by means of a monstrous state plan, where devastated areas are presented by long-time degraded woodland of no economic value whatsoever and by issuing concessions to private entities with no obligation of afforestation and shamefully low compensation thereof, without any further control, thus giving them free hands to clear woods and build without control or restrictions.

EXAMPLES OF DEVASTATED AREAS COVERED BY THE NATURA 2000

1. SPECIAL ORNITHOLOGICAL RESERVE CRNA MLAKA

Natura 2000

<http://natura2000.dzrp.hr/reportpublish/reportproxy.aspx?paramSITECODE=HR1000001>

<http://natura2000.dzrp.hr/reportpublish/reportproxy.aspx?paramSITECODE=HR2001335>

SITE CODE: HR1000001

SITE NAME : Pokupski bazen

The Crna Mlaka Ornithological Reserve is a large lowland forested area, with pedunculate oak (*Quercus petraea*), and due to its unique hydrographic and vegetation characteristics, as well as the richness of bird species, it is of exceptional European and world value.

Basic information: Ponds in the Pokupski basin near Jastrebarsko, surrounded by floodplain pedunculate oak forests. Significant for migratory and wintering birds.

Reserve type: ornithological

County: Zagreb

Municipality: Jastrebarsko

Protection proclaimed: 01.07.1980

Forest Management Unit: Karlovac

Forest Offices: Jastrebarsko, Pisarovina, Draganić, Karlovac

Management Units: Jastrebarski Lugovi, Pisarovinski Lugovi, Draganićki Lugovi, Rečički Lugovi

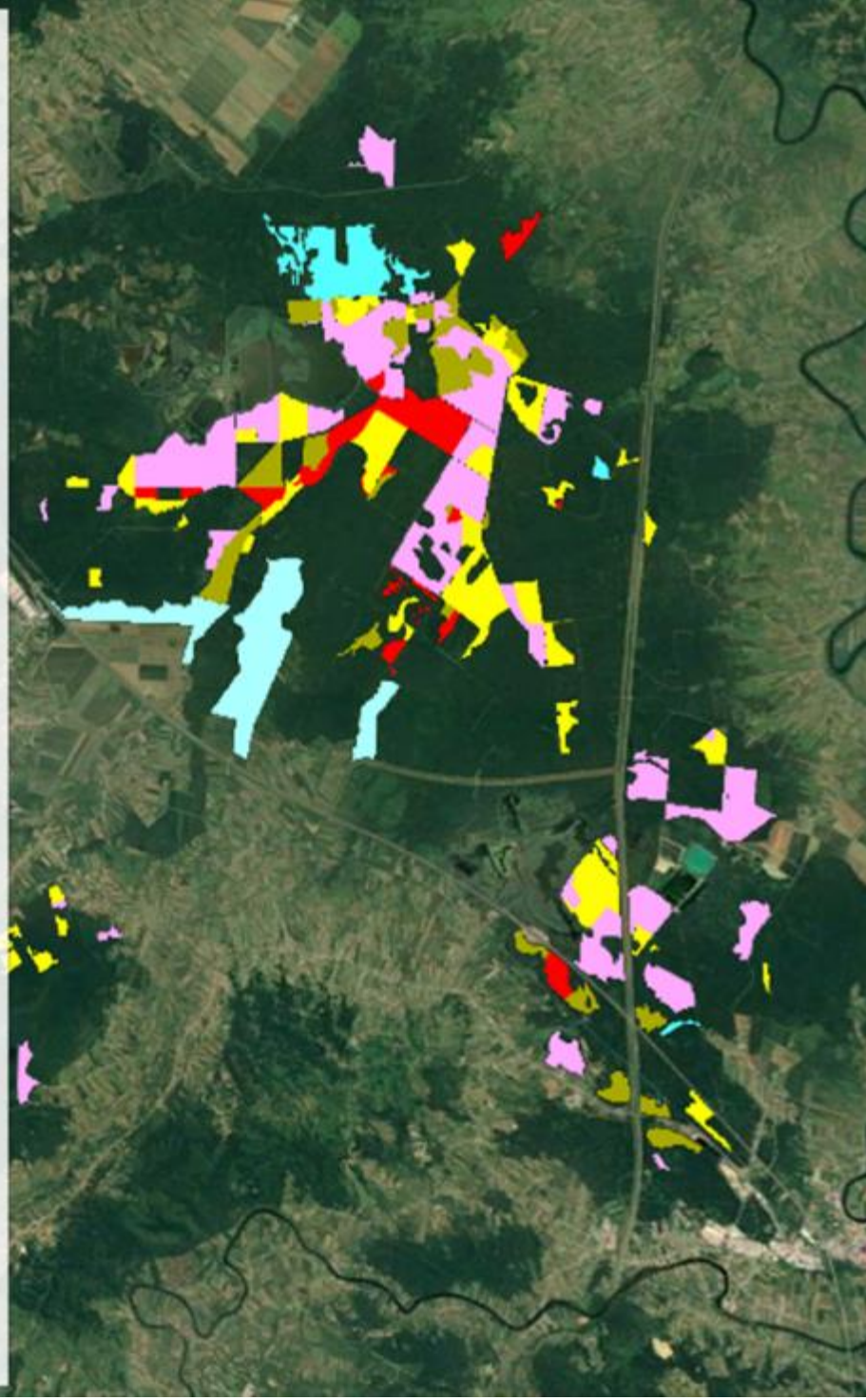
A review of the terrain, satellite images and recorded video material clearly shows non-compliance with the Nature 2000 Directives, i.e. a significant increase in the area of systematic deforestation from 2013 until today.

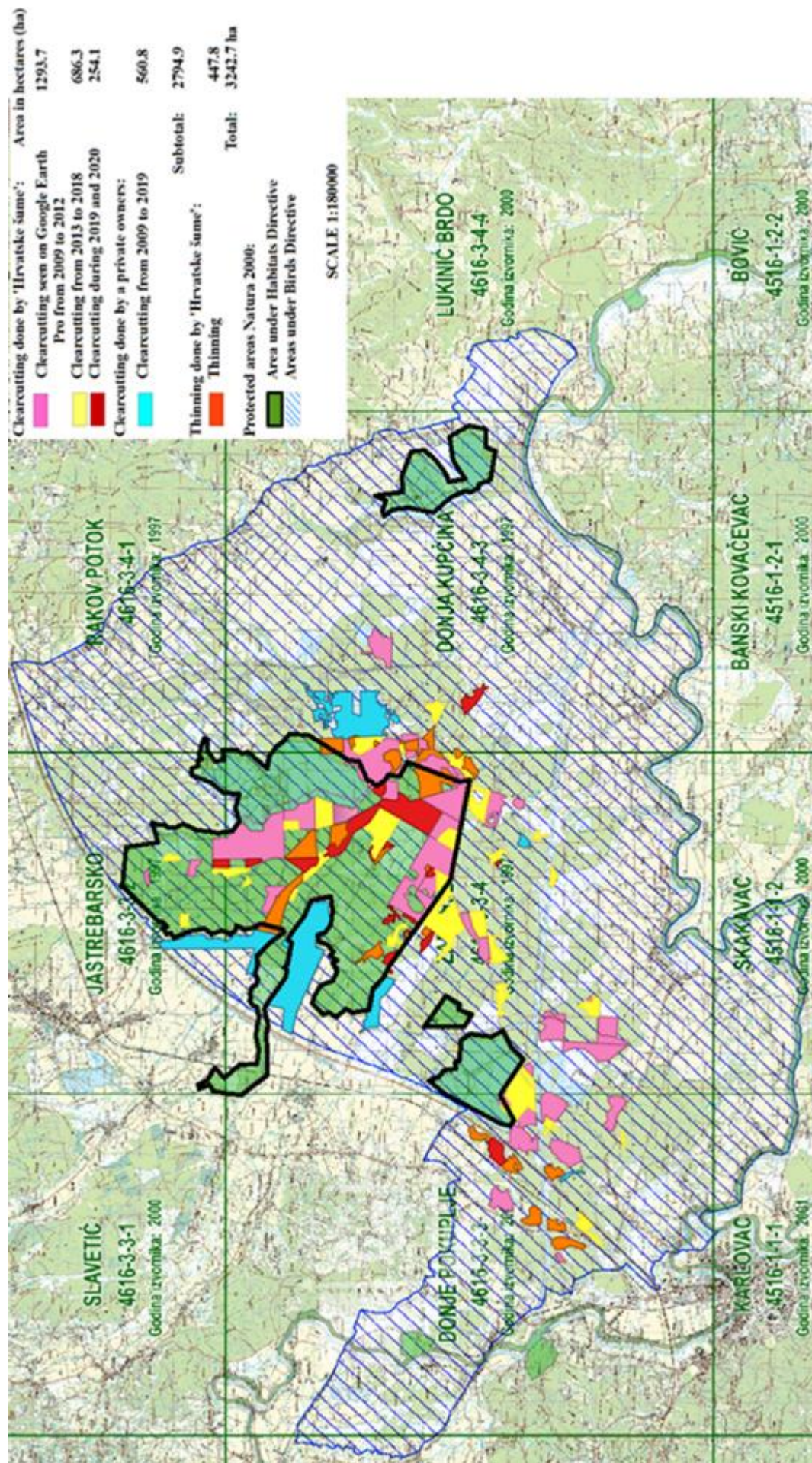
Note: By visiting the terrain during the month of September this year, we noticed a further, increased intensity of the devastation of the Crna Mlaka forest, which is not yet visible on satellite images.

SPECIAL ORNITHOLOGICAL RESERVE CRNA MLAKA

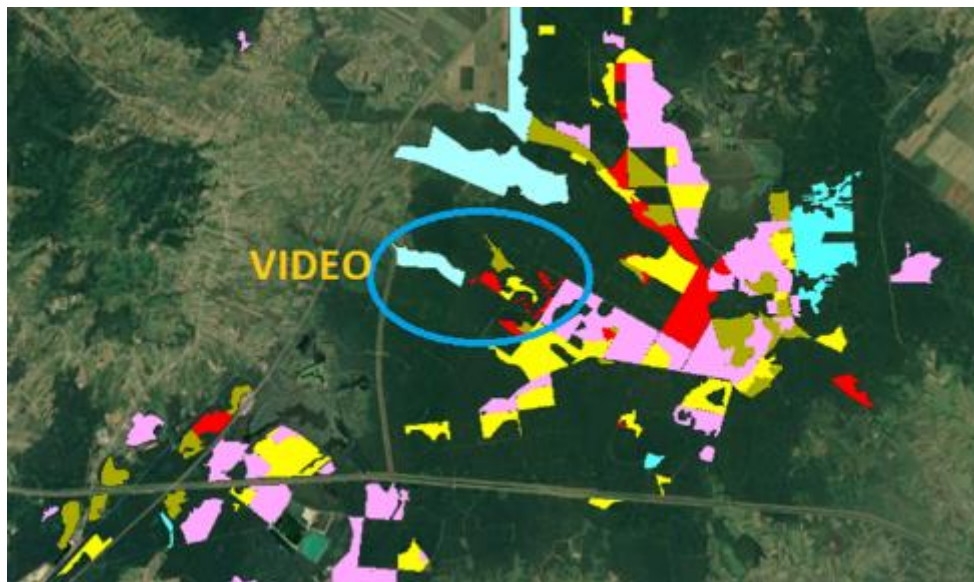
PROTECTION NATURA 2000, RAMSAR CONVENTION

2008 - 2019 DEFORESTATION TOT: 3242,7 ha





According to reports from our activists, new devastations were observed during 2020, which are not yet visible on satellite portals (red circles):



Watch a video of some of the devastations committed in 2019 and 2020 and those that are just underway:

<https://youtu.be/knmULZFtwiA>

2. SPECIAL ZOOLOGICAL RESERVE VAROŠKI LUG

Natura 2000

SITE CODE: HR2000444

SITE NAME: Varoški Lug

<http://natura2000.dzrp.hr/reportpublish/reportproxy.aspx?paramSITECODE=HR2000444>

Basic information: Old stands of pedunculate oak and hornbeam are home to almost all representatives of Central European fauna. The habitat of the black stork and the bald eagle is also of special value to the reserve.

Type: zoological reserve

County: Zagreb

Municipality: Dubrava

Protection proclaimed: 13.07.1982

The area southeast of Vrbovec along the watercourse of the river Glogovnica.

Old stands of Pedunculate oak (*Quercus robur*) and Hornbeam (*Carpinus betulus*), home to almost all representatives of Central European fauna. Likewise the habitat of the Black stork (*Ciconia nigra*) and the White-tailed eagle (*Haliaeetus albicilla*) is of special value.

Varoški lug was declared a Special Zoological Reserve in 1982. At that time, the Proposal Program for the protection and improvement of the Special Zoological Reserve was drawn up, and it includes the following measures: protection of water regime, protection of forest vegetation and animal species, protection of the reserve and scientific research in the reserve.

Most of the forest is managed by Hrvatske šume d.o.o.

Forest Management Office: Bjelovar

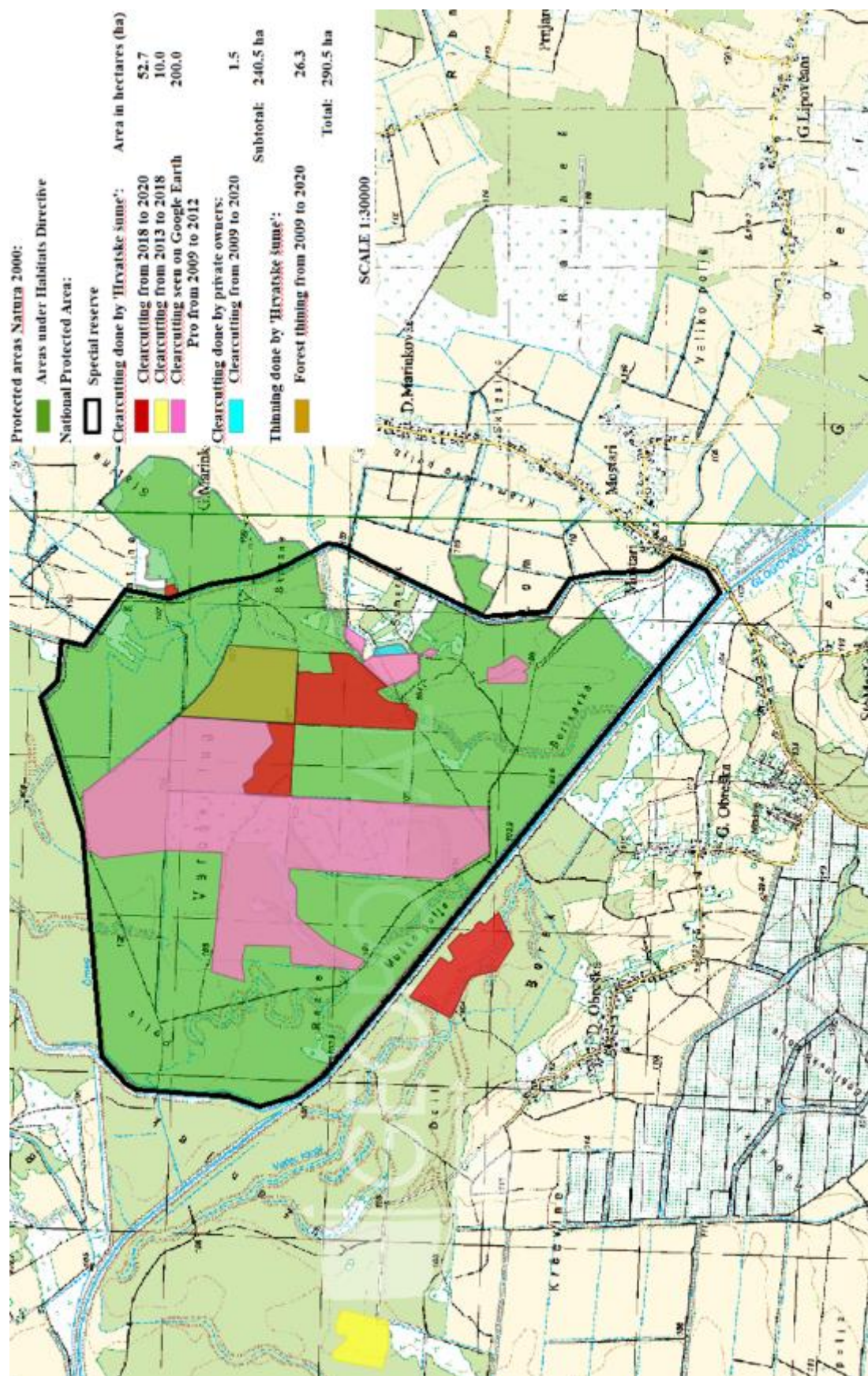
Forest Offices: Vrbovec

Management Unit: Vroški Lug

Follows the video with some of the devastated areas of the Varoški Lug Special Zoological Reserve:

<https://youtu.be/uZghdIK790I>





IMPORTANT:

According to information from the field, the final felling of section 6a is currently underway, which is marked in olive on the map as a thinning zone. According to the expert assessment of our activist, forester by profession, if the felling continues at the same pace, the entire section of 26 ha will be completely bare and without seedlings in just a few weeks by the end of October 2020!



3. NATURE PARK LONJSKO POLJE, DONJA POSAVINA

Natura 2000

SITE CODE: HR1000004

SITE NAME: Donja Posavina

<http://natura2000.dzrp.hr/reportpublish/reportproxy.aspx?paramSITECODE=HR1000004>

<http://natura2000.dzrp.hr/reportpublish/reportproxy.aspx?paramSITECODE=HR2000416>

Lonjsko Polje is the largest protected wetland in both Croatia and the entire Danube basin. It covers an area of 505.6 square kilometres (195.2 sq mi), extending along the river Sava from the areas east of Sisak, the lower course of the river Lonja for which it is named, to the areas west of Nova Gradiška, along the course of the river Veliki Strug.

Lonjsko polje Nature Park, as a wetland area, is one of the most endangered habitats in the world. It is one of the largest protected wetlands not only in Croatia but in the entire Danube basin. It is included in the so-called Ramsar list of wetlands of international importance, especially as a habitat for wetland birds. According to the criteria of the European Union Birds Directive, this area belongs to Important Bird Areas (IBA). It consists mainly of three fields: Lonjsko, Mokro and Poganovo polje.

The Nature Park was declared on March 6, 1990.

The total observed area of deforestation of the Lonjsko Polje Nature Park within the Natura 2000 protection area from 2009 to 2020 is 6759 Ha.

Within the nature park Lonjsko Polje, there are three special ornithological reserves:

1. ORNITHOLOGICAL RESERVE RAKITA

Basic information : Reserve within the Lonjsko polje nature park, along the old Lonja riverbed. Rich wetland vegetation, important especially for wintering ducks.

Reserve type: ornithological

Region: Sisak

Municipality: Sunja

Protection declared: 30.9.1969

Area: (Ha) 430

2. ORNITHOLOGICAL RESERVE ĐOL DRAŽIBLATO

Basic information: In the meander of the right bank of the Sava northwest of Puska. Wetland meadows, ash, willow and poplar forests. Significant for nesting ducks.

Reserve type: ornithological

Region: Sisak

Municipality: Sunja

Protection declared: 30.09.1969

Area: (Ha) 78

3. ORNITHOLOGICAL RESERVE KRAPJE ĐOL

Background: Mixed colony of spoonbills (*Platalea leucorodia* L.), and several species of herons, significant aquatic vegetation (*Hydrocharo-Stratiotetum* community); near the village of Drenov Bok.

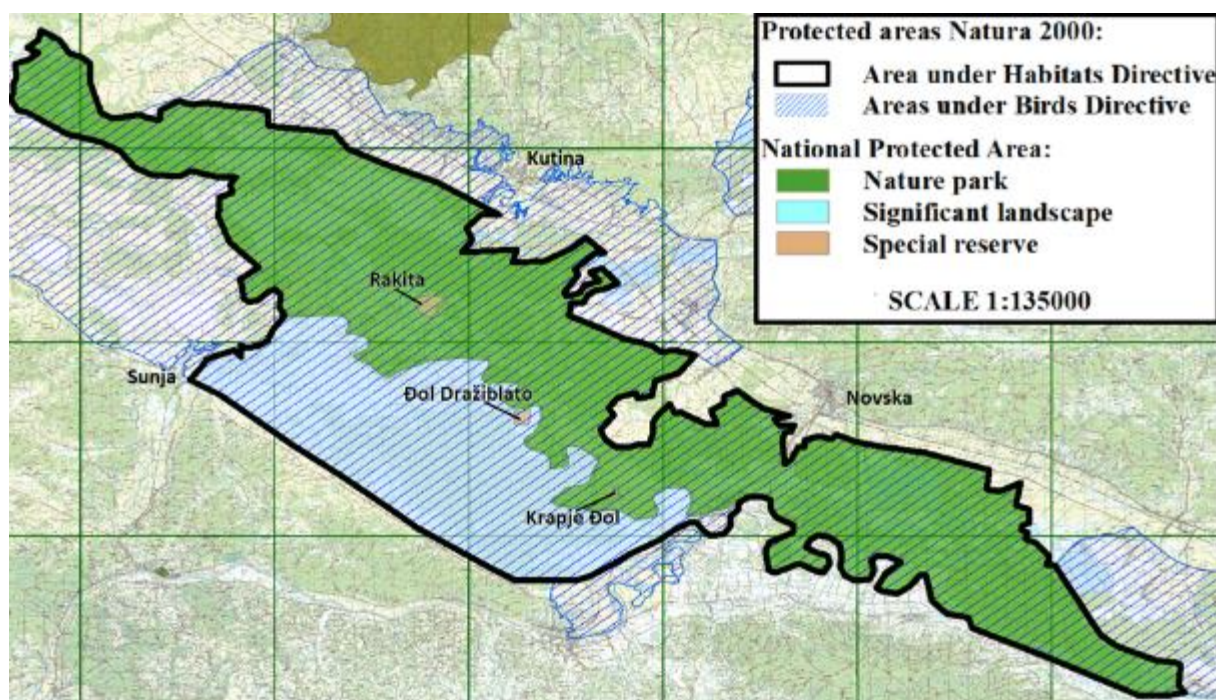
Reserve type: ornithological

Region: Sisak

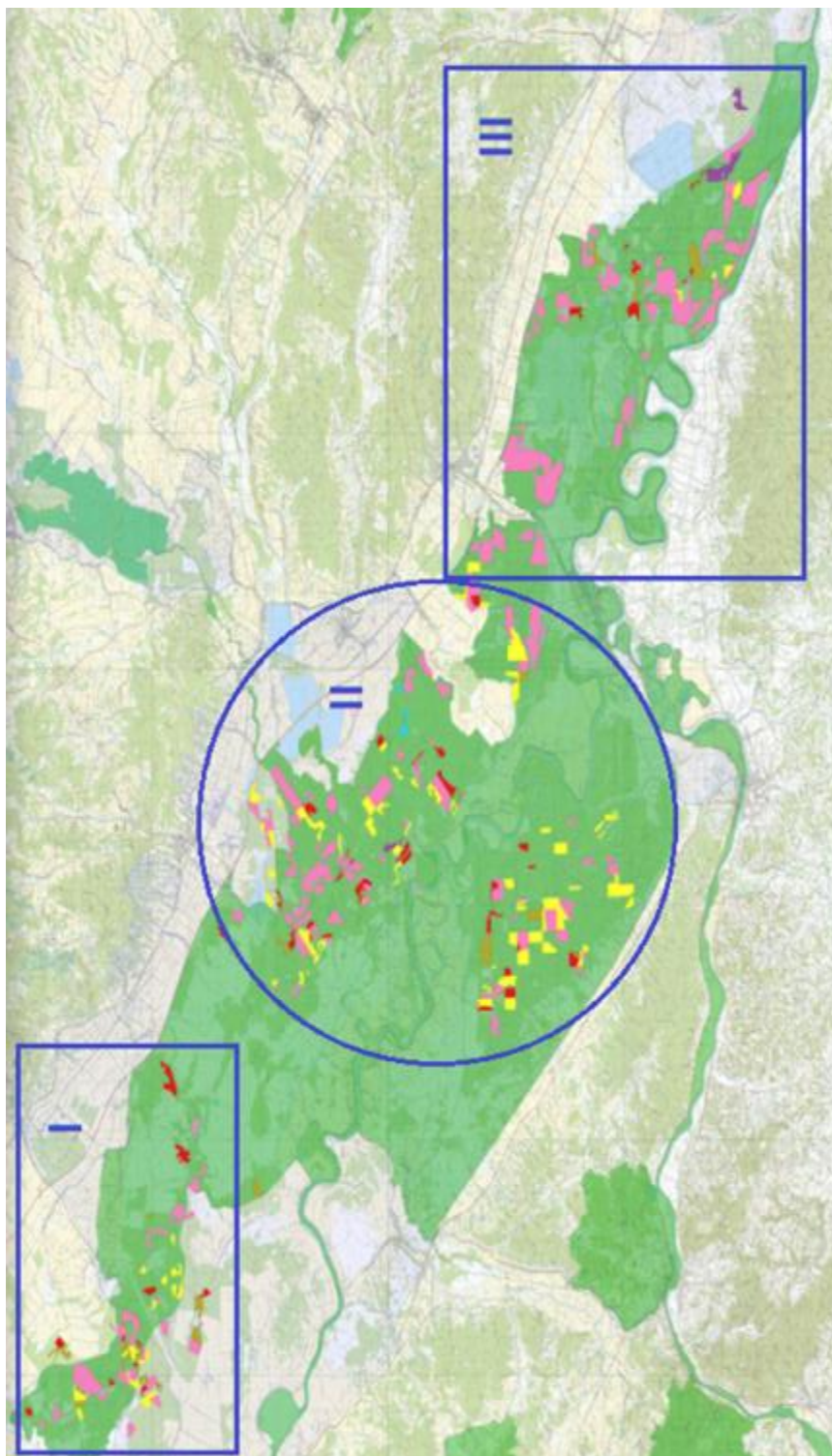
Municipality: Jasenovac

Protection proclaimed: 10.10.1963

Area: (Ha) 25

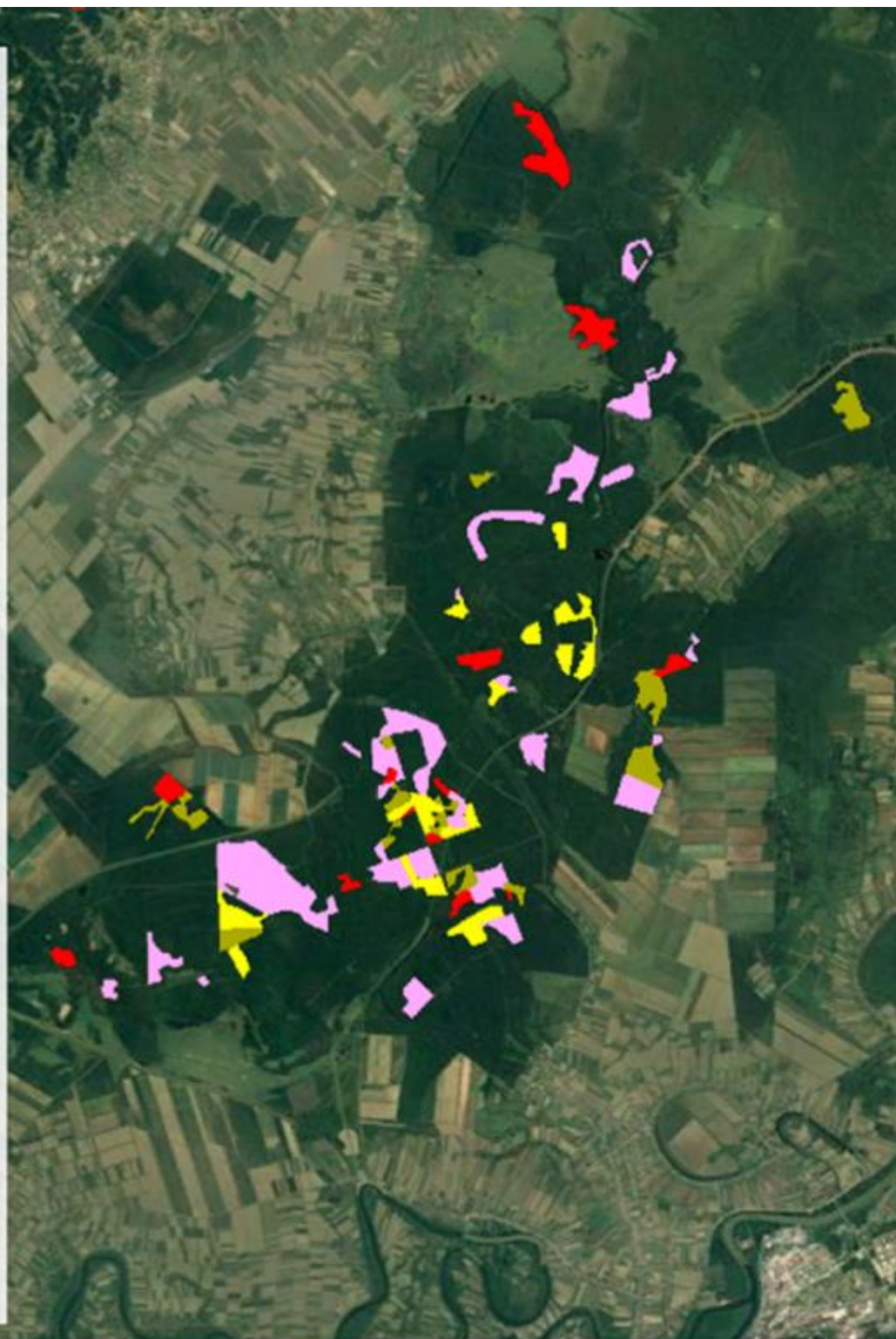


Due to the volume and more detailed presentation of forest devastation in the area of Lonjsko Polje, the analysis of map was divided into three parts:



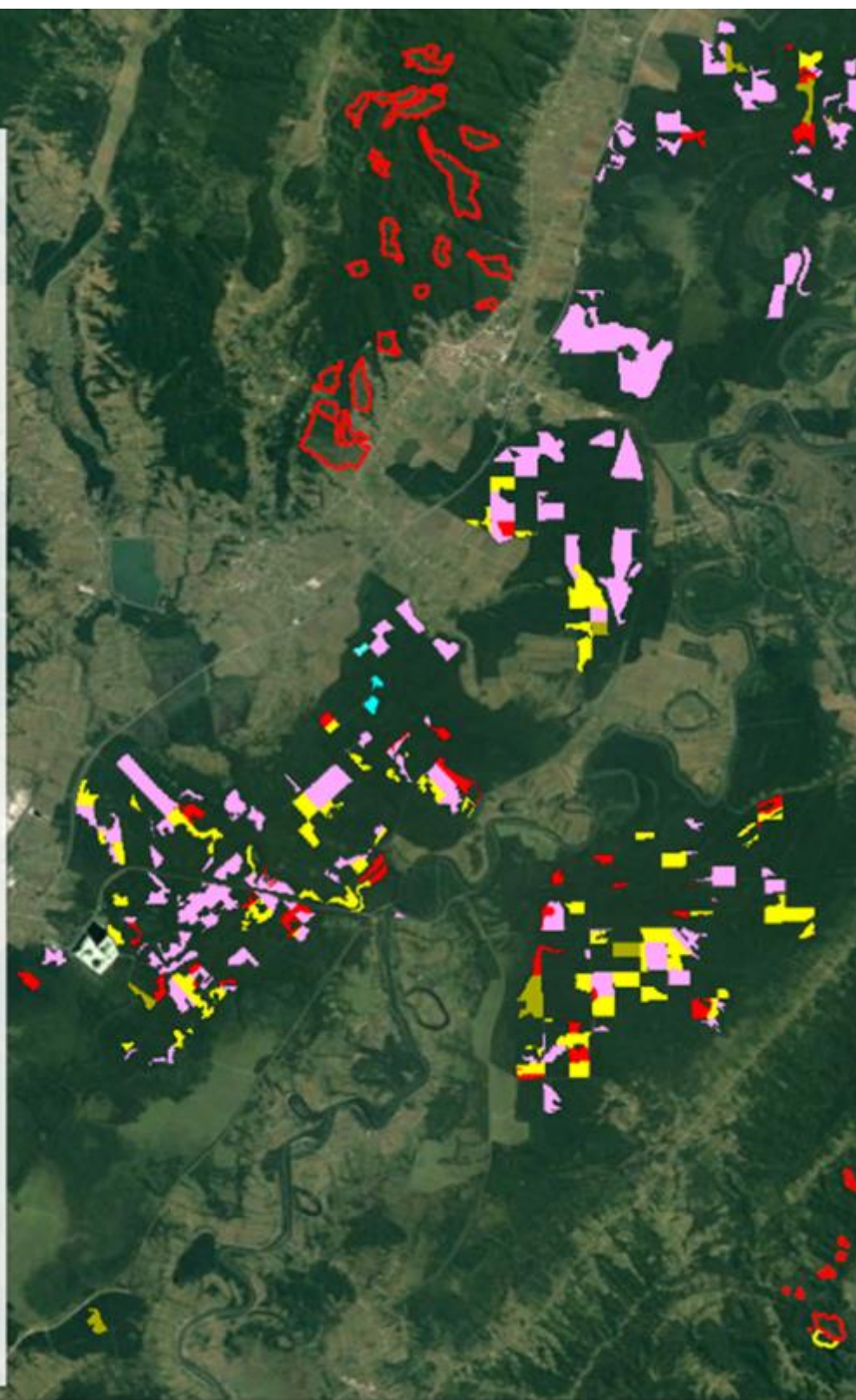
DONJA POSAVINA - NATURE PARK LONJSKO POLJE (I)

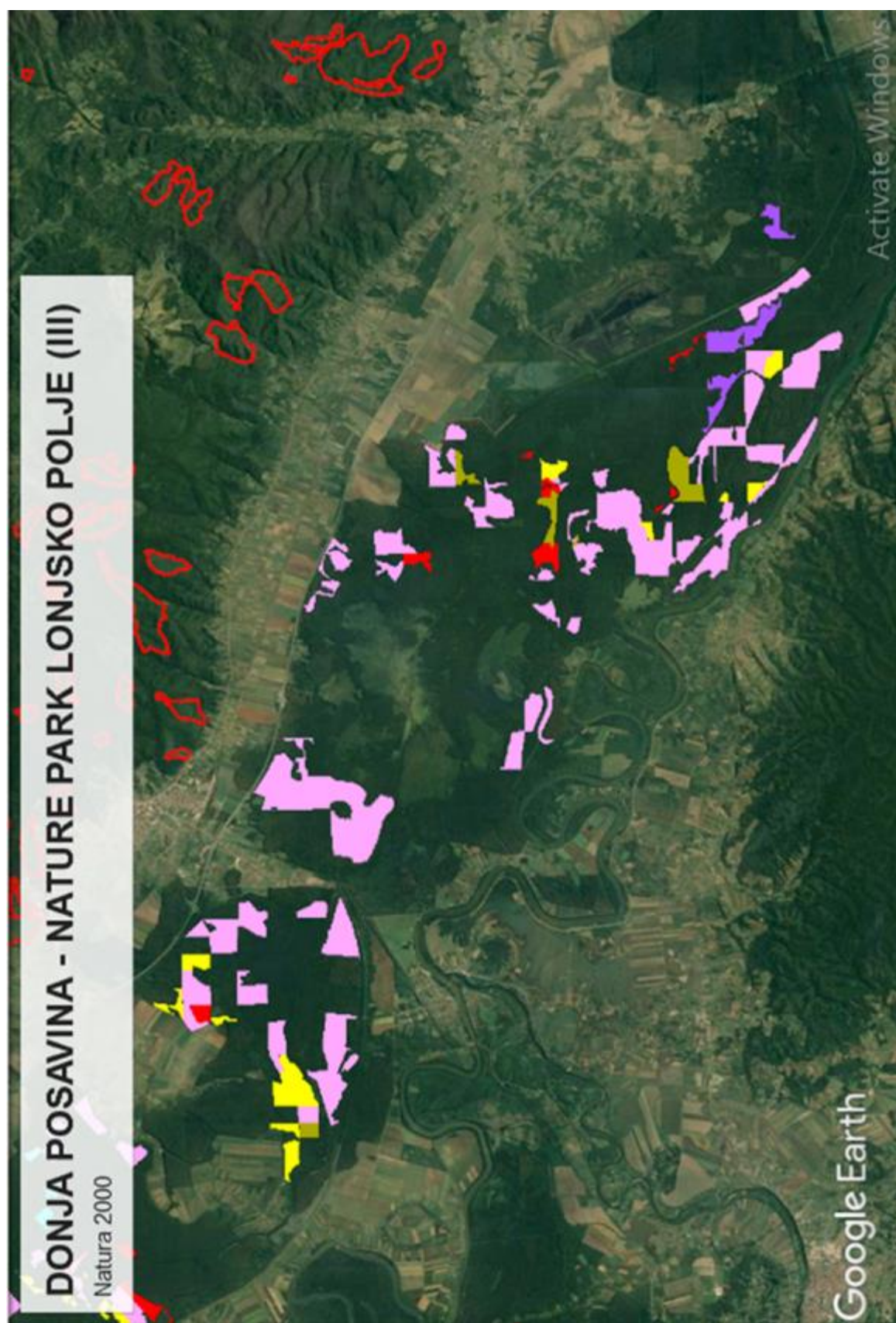
Natura 2000

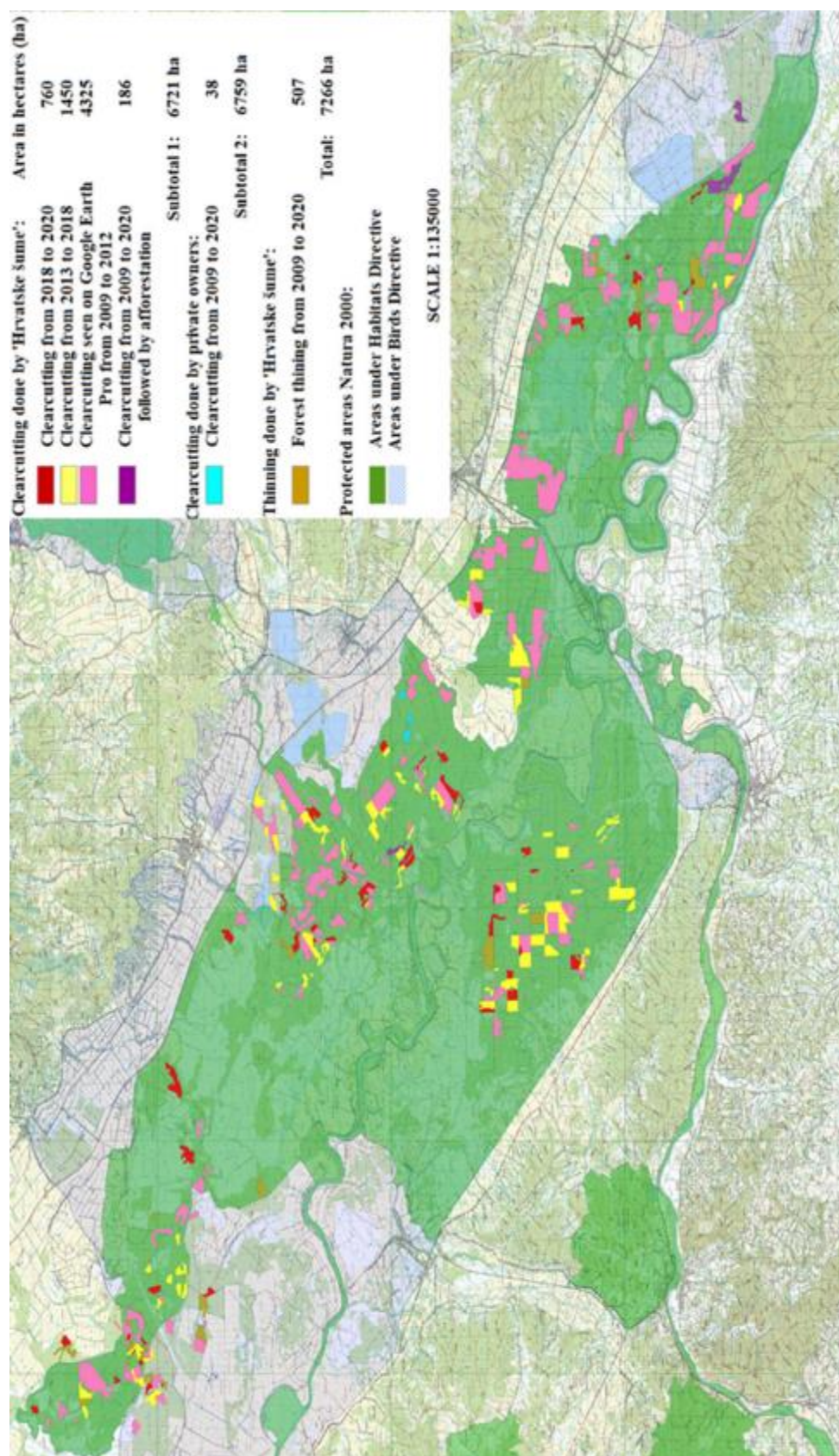


DONJA POSAVINA - NATURE PARK LONJSKO POLJE (II)

Natura 2000





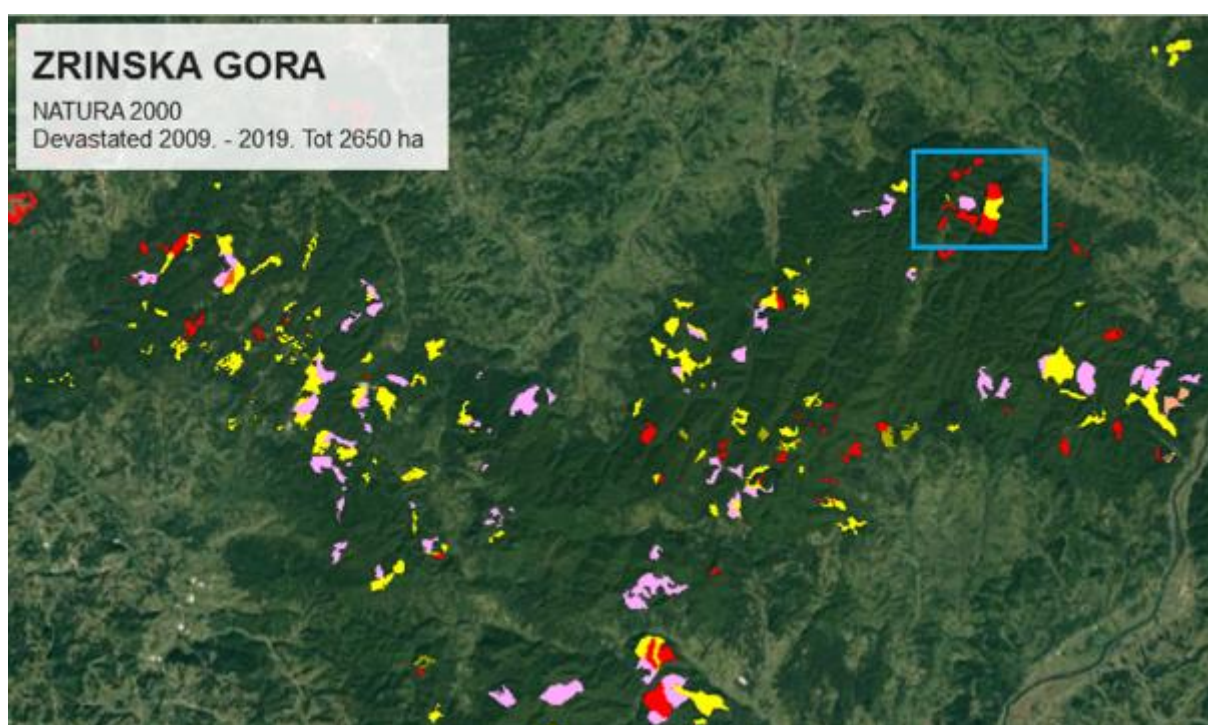


In exactly the same, irresponsible and brutal way, in the past ten years, all areas covered by the Natura 2000 eco-network have been devastated and are still being devastated.

In addition to those already shown, we will list just a few more:

Mt. Zrinska Gora:

<http://natura2000.dzrp.hr/reportpublish/reportproxy.aspx?paramSITECODE=HR2001356>



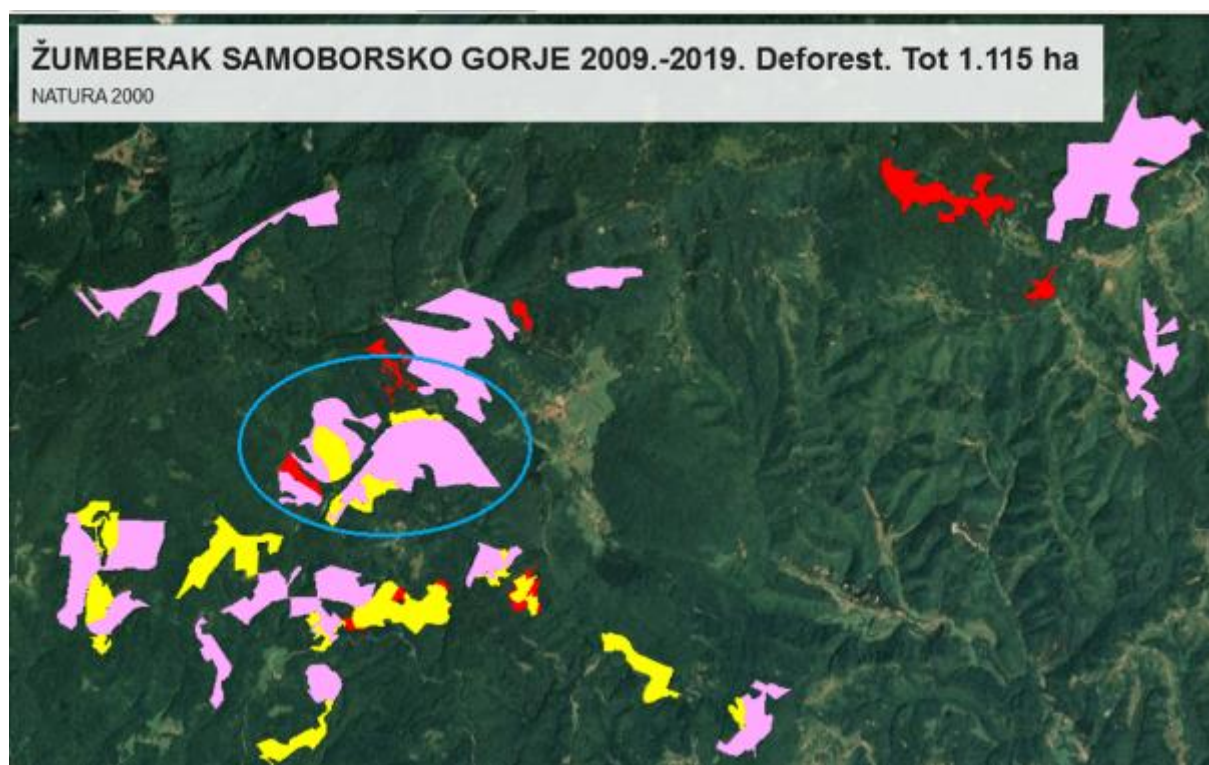
Only a small part of Zrinska Gora is marked with a blue rectangle, where deforestation is carried out ruthlessly, for years and according to plan, despite the fact that the area is in the Natura 2000 protection regime:

Mt. ZRINSKA GORA, 2013.- 2020. on 9 fields devast. tot. 230 ha
NATURA 2000



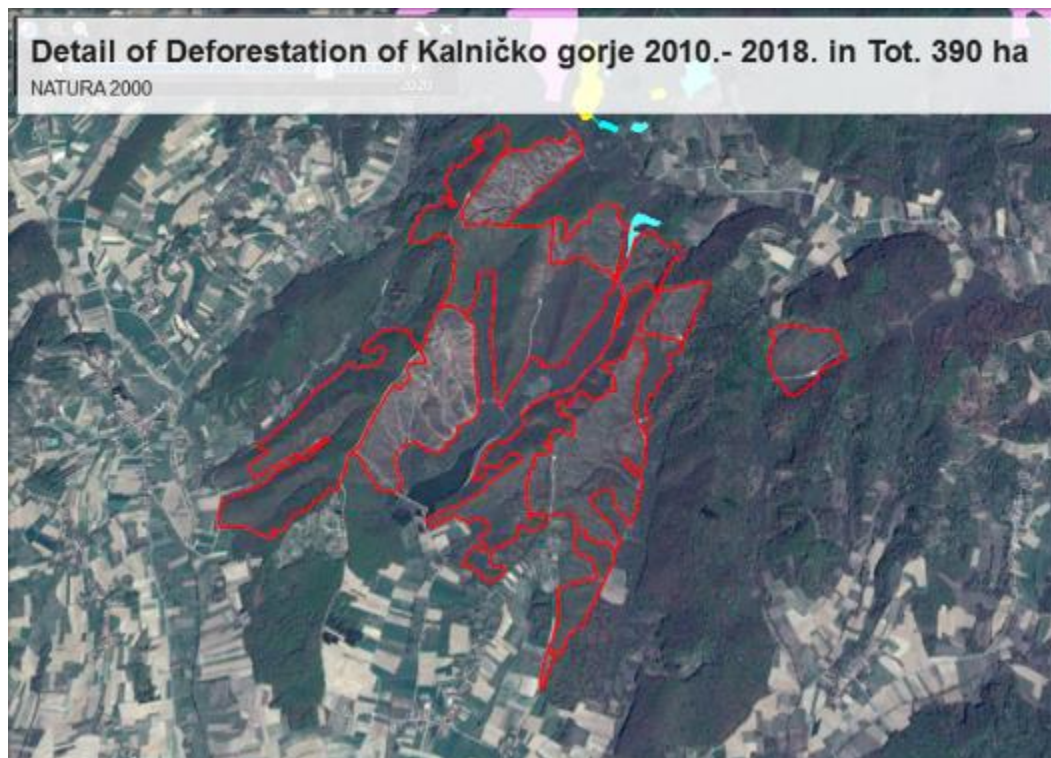
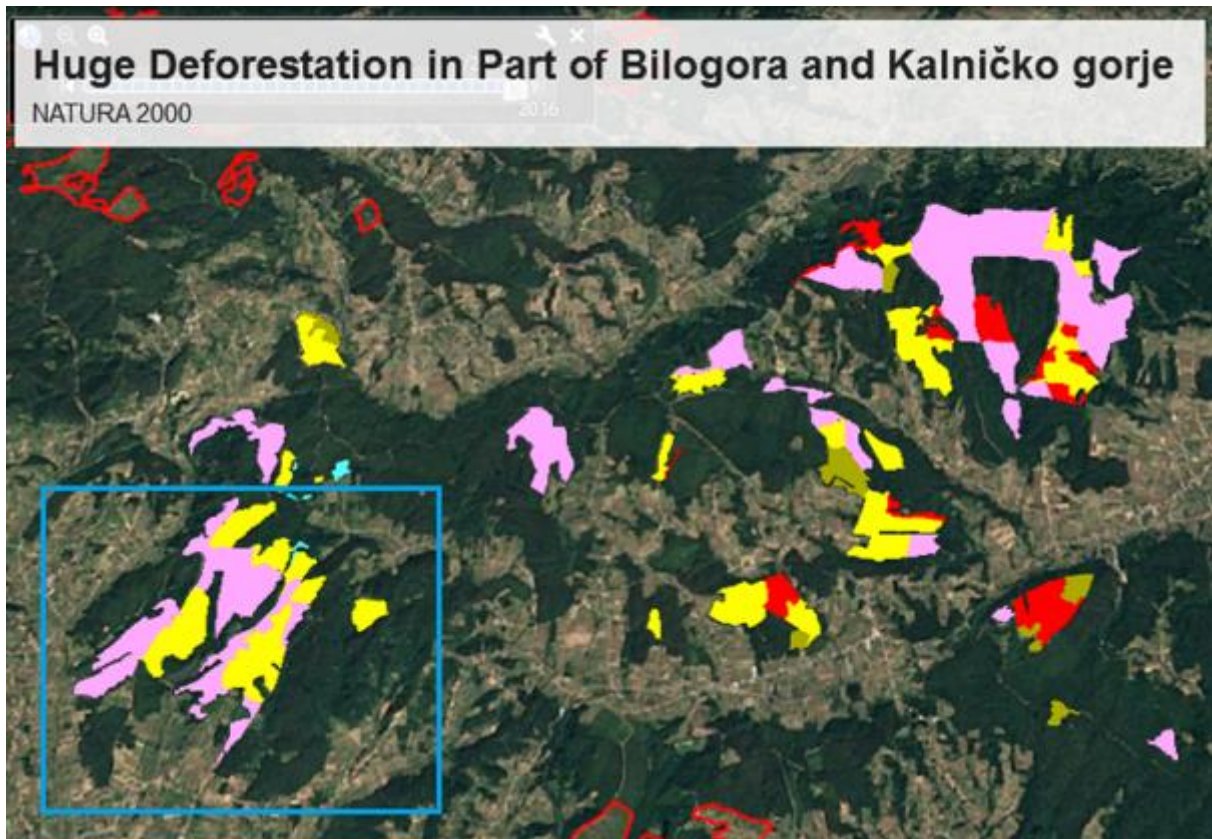
Žumberak Samoborsko gorje:

<http://natura2000.dzsp.hr/reportpublish/reportproxy.aspx?paramSITECODE=HR2000586>



Mt. Bilogora and Kalničko gorje:

<http://natura2000.dzrp.hr/reportpublish/reportproxy.aspx?paramSITECODE=HR1000008>



Having collected evidence, as of autumn 2018 we have submitted criminal report to the Office for the Suppression of Organized Crime and Corruption and to the State Prosecutor's Office of the Republic of Croatia in 700 plus pages of documents. Also, we have pressed charges against the responsible highly positioned officials of Hrvatske šume d.o.o.

1. **The first part of the official lawsuit** No: KR-DO-1412/2916 sent to the State Attorney's Office of the Republic of Croatia on 13th of December 2018.

Through several detailed documented chapters, we explained the causes of excessive logging with the basic goal of reselling timber, favoring private entrepreneurs in acquiring undue funds, and links to corrupt, high-ranking representatives of political centers of power.

- Excessive logging (inspection finding from 2014)
- Biomass cogeneration (possible effect on the need for excessive deforestation, consumption, Croatian Energy Market Operator - HROTE)
- Hrvatske šume d.o.o., Forest Management Plan: email as evidence of non - compliance with the approval procedure
- Business plans of Hrvatske šume d.o.o. for 2015, 2016, 2017 and 2018
- Doubt in the systematization of jobs in Hrvatske šume d.o.o.
- Minutes from the Experts' Meeting in 2017.
- Unnecessary costs related to the lawsuit of the former director of Croatian Forests Ivan Pavelić for the payment of a disproportionately large bonus
- Decisions on the establishment of right-of-use of forest land - wind farms Senj – Lučko
- Suspicion of illegal employment in the Administration of the Ministry of Agriculture without a public tender, the signatory of the decision is the Minister of Agriculture Tomislav Tolušić
- "Forest Biomass", suspicious appointment of the director of a company in the process of bankruptcy

On 18th of December 2018, the State Attorney's Office officially submitted the lawsuit to the Zagreb County State's Attorney's Office for further competent proceedings *"... as an indication of corruption, a petition of the Veterans' Association VIDRA - Veterans and a social action alleging possible irregularities in the operations of Hrvatske šume d.o.o.. The responsible persons of the Croatian Chamber of Forestry and Wood Technology Engineers, the Faculty of Forestry in Zagreb, Hrvatske šume d.o.o., and the Ministry of Agriculture and the Ministry of Energy were also involved..."*.

2. **On 3rd of January 2019, we submitted to the State Attorney's Office the first amendment** to the lawsuit dated 18th of December 2018, with the following content:

- APPENDIX to item 1. Excessive felling, cogeneration on biomass
- Contract for the supply of wood chips without the obligation of use in production

- APPENDIX to item 2 of Hrvatske šume d.o.o., Economic Basis, Business Plan
- Management of Medvednica without valid Management Basis
- Review of a member of the Green Squad (M.Sc. in Forestry) on the management and use of forests under the management of the public company Hrvatske šume d.o.o., in terms of possible non-compliance with the positive legal provisions of the Republic of Croatia.
- Leasing of forest land without a valid Management Basis
- Decree from 2018, leasing of forest land - invitation / annulment of a part of the Invitation - Minister Tolušić
- APPENDIX item 2. Hrvatske šume d.o.o.
- Doubt in favoring (oversizing) of works intended for authorized contractors
- Oversized log extraction routes, studies Udbina 1 and 2
- APPENDIX to item 2. Hrvatske šume d.o.o, doubt in the systematization of jobs
- Mobbing
- Blaženka Rogan, emails, lawsuit
- A fictional mansion

3. **On March 7, 2019, we filed a second amendment** to the lawsuit dated 18th of December 2018, which contains irregularities that could indicate the implementation of organized criminal activities in Hrvatske šume d.o.o. 2012 - 2018:

- Non-market pricing of firewood
- Questionable invoicing of energy-use wood
- Employment of temporary workers
- Questionable public tender for 7 directors of Sector Hrvatske šume d.o.o.
- Disputed invoices with the tractor manufacturer Hittner / Report on the State Audit Office of the Public Procurement Audit in the Company HŠ / Current Management of HP d.o.o. did not sue the former Management
- Illegal protection and misconduct in key positions of the head of the commercial department of UŠP Gospić and successfully the next appointed head of the branch
- Devastation of the highest quality forest ecosystems under the management of Hrvatske šume d.o.o. revealed in 2014 by the state forestry inspection
- Dumping price list of forest products for 2018
- Public Procurement Audit for 2017
- Illegal Business Plan of Hrvatske šume d.o.o. for 2019

- The decision to terminate the contract with cogenerations / they are still in the system of incentives even though they do not work / Doubt in the continuation of benefits to the owners of cogeneration plants on biomass.
- Invitation for the sale of wood chips in 2019
- Possible irregularities in the work and management of the Forest Administration of the Gospić branch
- Lack of wood mass
- Minutes of internal control
- Suspicion of intentionally causing forest fires in Lika region
- Illegal protection and mansion-turnover in key positions of the head of the Commercial Department of UŠP Gospić
- Illegal business of the Pergment sawmill

4. **On 8th of November 2019, we filed the third amendment** to the lawsuit from 18th of December 2018, which contains:

- Observed indicators that Hrvatske šume d.o.o. planned and carried out excessive logging for years
- Questionable legal business of Hrvatske šume d.o.o after 31st of December 2017
- Suspicion of misuse of the Personal Identification Number of citizens in the business of Hrvatske šume d.o.o. for the purpose of gaining undue material benefit from licensed forestry contractors
- Non-compliance with the procedure for initiating administrative proceedings in the process of obtaining approval of the management basis from the Ministry of Agriculture and the Ministry of Economy and Sustainable Development
- Questionable legality of operations of Hrvatske šume d.o.o. according to the Business Plan for 2019
- Questionable legality of the medium-term Business Plan of Hrvatske šume d.o.o. for the period from 2019-2021
- Suspicion of illegally obtained material profit in the Forest Administration Zagreb Branch after the Rea storm in May 2019
- Testimony of the director of Management Unit of Hrvatske šume d.o.o. on observed irregularities and illegal operations of the Forestry Levanjska Varoš, Forest Administration of the Osijek Branch.



REPUBLIKA HRVATSKA
DRŽAVNO ODVJETNIŠTVO REPUBLIKE HRVATSKE

Broj: KR-DO-1412/2016
Zagreb, 18. prosinca 2018.
TL/TL

ŽUPANIJSKO DRŽAVNO ODVJETNIŠTVO U ZAGREBU

Z A G R E B

Sukladno Općoj uputi Državnog odvjetništva Republike Hrvatske broj O-3/11 od 11. svibnja 2011. o radu državnih odvjetništava i Ureda na predmetima u kojima postoje naznake korupcije i organiziranog kriminala, u kojima je došlo do sukoba nadležnosti i u predmetima u kojima se zamjenici općinskih i županijskih državnih odvjetnika upućuju na radu u Ured, dostavljam vam u prilogu na daljnje nadležno postupanje, kao naznaku korupcije, predstavku braniteljske udruge Vidra – Veterani i društvena akcija u kojoj se navode moguće nepravilnosti u poslovanju Hrvatskih šuma d.o.o., a u koja bi bile uključene i odgovorne osobe Hrvatske komore inženjera šumarstva i drvne tehnologije, Šumarskog fakulteta u Zagrebu, Hrvatskih šuma d.o.o., te Ministarstva poljoprivrede i Ministarstva energetike, budući ste u konkretnom slučaju, sukladno navedenoj Uputi, stvarno i mjesno nadležni za postupanje po istoj.

ZAMJENICA GLAVNOG DRŽAVNOG ODVJETNIKA
REPUBLIKE HRVATSKE



Tamara Laptoš

Prilog: kao u tekstu

O tome obavijest: ✓
VIDRA – Veterani i društvena akcija
ZAGREB
Trnjanska cesta 72

Na znanje:
Ured za suzbijanje korupcije i organiziranog kriminaliteta, Zagreb



VIDRA – Veterani i društvena akcija

Trnjanska cesta 72, 10000 Zagreb

OIB 90260251083

IBAN: HR5124020061100845708

GSM 095 925 3766

Državno odvjetništvo

Republike Hrvatske

Gajeva 30a

10000 Zagreb

REPUBLIKA HRVATSKA
DRŽAVNO ODVJETNIŠTVO
REPUBLIKE HRVATSKE - ZAGREB

Zagreb, 13. prosinca 2018.

Primljeno: 13-12-2018			
Op. št.	BROJ	P. št.	Meš.

Predmet:

Informacija o mogućim ozbiljnim nepravilnostima u gospodarenju hrvatskim šumama od strane „Hrvatskih šuma“ d.o.o, mogućim ozbiljnim odstupanjima u provođenju Plana gospodarenja hrvatskim šumama, te mogućem otuđenju i prikrivanju otuđenja velike količine državnih resursa i društvene imovine – hrvatskih šuma

HITNO

Poštovani,

budući da se radi o zaštiti državne imovine, ali i otvorene ugroze opstojnosti hrvatskih šuma u cjelini, te zbog već nastale štete, ali i mogućih ozbiljnih posljedica, dostavljamo vam prikupljenu dokumentaciju na uvid i hitno postupanje.

Uvidom u Posebno izvješće od 7. srpnja 2014. o poslovanju „Hrvatskih šuma“ d.o.o. u Zagrebu upućeno tadašnjem ministru poljoprivrede Tomislavu Jakovini sa opisom postupaka i utvrđenih nepravilnosti glede prekomjerne sječe hrvatskih šuma utvrdili smo da su njime obuhvaćena mnoga prekršačenja i nepravilnosti, te uočeni mnogi propusti u radu „Hrvatskih šuma“ d.o.o, no, u njemu nije vidljiv cijeli opseg katastrofalne devastacije ogromnih šumskih površina, kao ni navedeni razlozi za, po našem mišljenju, kontinuirano činjenje najvećeg ekocida u novijoj hrvatskoj povijesti, te slijevanje ogromne količine materijalnih sredstava u privatne džepove.

Već dulji niz godina sadašnji su članovi, aktivisti i simpatizeri Zelenog odreda, foruma braniteljske udruge VIDRA sporadično i pojedinačno prijavljivali grube devastacije šuma na Medvednici, Žumberku, Velebitu, Petrovoj gori, Psunju, Papuku, Bilogori, Zelinskoj Gori, u Gorskom Kotaru, Istri, itd, a novijim datumima zamjećene su čak i devastacije nacionalnih parkova i parkova prirode diljem cijele Republike Hrvatske koji su pod posebnom zaštitom međunarodne eko mreže Natura 2000! Uz gotovo sve planine obrasle šumom, načeti su i gotovo svi manji proplanci, pa i tzv. „urbane šume“ po gradovima. Posebno zabrinjava što je iznošenje drvne građe započelo i u najvrjednijim šumskim resursima - hrvatskim prašumama!

Pustošenjem prevelikih šumskih površina neminovno je dovelo do presušivanja izvora vode, pojave klizišta i odrona opasnih po imovinu i živote ljudi, ali i do ozbiljnog ugrožavanja biljnih i životinjskih staništa. Na nekim su područjima neke endemske, strogo zaštićene vrste nestale u potpunosti. Na prijave i upite Zelenog odreda nadležnima u Hrvatskim šumama,



REPUBLIKA HRVATSKA
DRŽAVNO ODVJETNIŠTVO
VIDRA - Veterani i društvena akcija
URED ZA SUZBIJANJE KORUPCIJE
I ORGANIZIRANOG KRIMINALITETA

Trnajska cesta 72, 10000 Zagreb
OIB 90260251083

IBAN: HR5124020061100845708

GSM 095 925 3766

Primlj.	03 -01- 2019	IBAN: HR5124020061100845708	
Org. jed.	BROJ	Prilog	Vrijednost

USKOK

Zagreb, 3.siječnja 2019.

Državno odvjetništvo

Ured za suzbijanje korupcije i organiziranog kriminaliteta

Gajeva 30a

10000 Zagreb

Predmet:

DOPUNA spisa od 18.prosinca 2018.

(Informacija o mogućim ozbiljnim nepravilnostima u gospodarenju hrvatskim šumama od strane „Hrvatskih šuma“ d.o.o, mogućim ozbiljnim odstupanjima u provođenju Plana gospodarenja hrvatskim šumama, te mogućem otuđenju i prikrivanju otuđenja velike količine državnih resursa i društvene imovine – hrvatskih šuma)

S poštovanjem,



Vesna Grgić

Predsjednica braniteljske udruge

„VIDRA-Veterani i društvena akcija“

Prilog: kao u listu

U ime: članice

VIDRA - Veterani i društvena akcija

ZAGREB

Trnajska cesta 72

Na ime:

Ured za suzbijanje korupcije i organiziranog kriminaliteta, Zagreb



VIDRA – Veterani i društvena akcija

REPUBLIKA HRVATSKA
URED PUČKOG PRAVOBRANITELJA
Trnjanska cesta 72, 10000 Zagreb
018 90260251083
HR5124020061100845708

Primijeno:	07.03.2019.	
Br. predmeta:	Br. ocn.: činik/	GSM 095 925 3766
Ozn. redn. broj / godina	ustroj. jedinica / službeni	
Im. sadržaj / diskriminacija	Br. priloga	Br. listova

USKOK

Zagreb, 7. ožujka 2019.

Državno odvjetništvo

Ured za suzbijanje korupcije i organiziranog kriminaliteta

Gajeva 30a

10000 Zagreb

Predmet:

2. DOPUNA spisu od 18. prosinca 2018.

(Informacija o mogućim ozbiljnim nepravilnostima u gospodarenju hrvatskim šumama od strane „Hrvatskih šuma“ d.o.o. mogućim ozbiljnim odstupanjima u provođenju Plana gospodarenja hrvatskim šumama, te mogućem otuđenju i prikrivanju otuđenja velike količine državnih resursa i društvene imovine – hrvatskih šuma)

S poštovanjem,

Vesna Grgić

Predsjednica braniteljske udruge
VIDRA – Veterani i društvena akcija





VIDRA – Veterani i društvena akcija

Trnajska cesta 72, 10000 Zagreb

OIB 90260251083

IBAN: HR5124020061100845708

e-mail: info@veteranividra.hr

GSM ++385 95 925 3766

USKOK

Zagreb, 8. studenog 2019.

Državno odvjetništvo

Ured za suzbijanje korupcije i organiziranog kriminaliteta

Gajeva 30a

10000 Zagreb

Predmet: Dopuna predmeta Broj: KR-DO-1412/2016 od 13. prosinca 2018. godine

(informacija o mogućim ozbiljnim nepravilnostima u gospodarenju hrvatskim šumama od strane „Hrvatskih šuma“ d.o.o. mogućim ozbiljnim odstupanjima u provođenju Plana gospodarenja hrvatskim šumama, te mogućem otuđenju i prikrivanju otuđenja velike količine državnih resursa i društvene imovine-hrvatskih šuma)

S poštovanjem,

Vesna Grgić

Predsjednica braniteljske udruge

„ViDrA“ - Veterani i društvena akcija



REPUBLIKA HRVATSKA
DRŽAVNO ODVJETNIŠTVO
URED ZA SUZBIJANJE KORUPCIJE
I ORGANIZIRANOG KRIMINALITETA

Primlj. 08.11.2019

Org. broj	BROJ	Prilog	Vrijednost

5. **On 29th January 2020 we submitted a criminal report** against the people responsible for the devastation of Mt. Medvednica where the damage and the deficit of 300,000 m³ of wood stock in the counter value of approx. 14 million euros was found.



VIDRA – Veterani i društvena akcija

Trnajska cesta 72, 10000 Zagreb

OIB 90260251083

IBAN: HR5124020061100845708

e-mail: info@veteranividra.hr

GSM ++385 95 925 3766

Državno odvjetništvo Republike Hrvatske

Zagreb, 29.siječnja 2020.

Gajeve 30a
10000 Zagreb

KAZNENA PRIJAVA

Braniteljska udruga VIDRA-Veterani i društvena akcija po predsjednici Vesni Grgić podnosi kaznenu prijavu protiv:

1. **Krunoslava Jakupčića**, predsjednika Uprave Hrvatskih šuma d.o.o. u periodu od 2008.d do 2017. godine voditelj Uprave šuma Podružnice Zagreb
2. **Damira Miškulina**, voditelja Uprave šuma podružnice Zagreb, u periodu od 2008. Do 2017. godine rukovoditelj Proizvodnog odjela Uprave šuma Podružnice Zagreb i pomoćnik voditelja Uprave šuma Podružnice Zagreb, Krunoslava Jakupčića

zbog udruživanja, zloporabe, bespravne i pretjerane sječe šume na Medvednici, a radi stjecanja nepripadne imovinske koristi, pri čemu je nastala šteta od 104,740.921 kn.

3. **Ivice Dugačkog**, upravitelja Šumarije Zagreb u periodu od 2009. godine do danas

zbog udruživanja, zloporabe, bespravne i pretjerane sječe šume u gospodarskim jedinicama „Sljeme-Medvedgradske šume“, „Bistranska Gora“ i „Markuševačka Gora“, na Medvednici, a radi stjecanja nepripadne imovinske koristi, pri čemu je nastala šteta od 86,458.263 kn

4. **Zvonka Gregurovića**, upravitelja Šumarije Donja Stubica do 2017. godine.

zbog udruživanja, zloporabe, bespravne i pretjerane sječe šume u gospodarskoj jedinici Stubička Gora, na Medvednici, a radi stjecanja nepripadne imovinske koristi, pri čemu je nastala šteta od 18,282.658 kn.

We submitted the criminal charges for association, abuse and illegal and excessive deforestation on Mt. Medvednica to:

1. State Attorney's Office of the Republic of Croatia
2. Marija Vučković, Minister of Agriculture
3. Tomislav Čorić, Minister of Economy and Sustainable Development
4. Andrija Mikulić, Chief State Inspector, State Inspectorate
5. Zdravko Marić, Deputy Prime Minister and Minister of Finance

The lawsuit was sent to the following addresses for inspection:

1. Andrej Plenković, Prime Minister of the Republic of Croatia
2. Lora Vidović, Office of the Ombudsman
3. Dražen Jelenić, then Chief State Attorney

Of all the mentioned above, we received feedback only from the Office of the Prime Minister in the form of a forwarded document CLASS: 022-13 / 19-05 / 03, REGISTRATION NUMBER: 50302 / 22-20-3 of 31st of January 2020, in which the Prime Minister Andrej Plenković requests from the Minister of Agriculture investigation and statement - of the following content:

"Dear madam Minister, dear Marija,

The Office of the Prime Minister received a notification on a criminal complaint based on possible serious irregularities in Croatian forest management by Hrvatske šume d.o.o., possible serious deviations in the implementation of the Croatian Forest Management Plan, and possible alienation and concealment of large amounts of state resources and social property - Croatian forests. I am forwarding the notification in question in the Attachment.

Please check the allegations in the application and submit your statement to this Office with a reference to the above mentioned registration number."

Until the time of compiling of this report, we have not received a single document on the statement of Minister Marija Vučković.

We note that on January 3, 2019, we informed the Prime Minister Andrija Plenković about irregularities in the management of Hrvatske šume d.o.o. (Croatian Forests Ltd.), but only after receiving an ad hominem criminal report for the deforestation of Medvednica on January 29, 2020 his first reaction followed: he asked for a statement from the Minister Vučković.



VLADA REPUBLIKE HRVATSKE
URED PREDSEDNIKA

KLASA: 022-03/19-05/03

URBROJ: 50302/22-20-3

Zagreb, 31. siječnja 2020.

MINISTARSTVO POLJOPRIVREDE
gospođa Marija Vučković, ministrica

PREDMET: VIDRA - Veterani i društvena akcija, Zagreb
- proslijeđuje se

Cijenjena gospođo ministrico, *dragja Marija,*

u Uredu predsjednika Vlade zaprimljena je obavijest o podnesenoj kaznenoj prijavi temeljena na mogućim ozbiljnim nepravilnostima u gospodarenju hrvatskim šumama od strane Hrvatskih šuma d.o.o., mogućim ozbiljnim odstupanjima u provođenju Plana gospodarenja hrvatskim šumama, te mogućem otuđenju i prikrivanju otuđenja velike količine državnih resursa i društvene imovine - hrvatskih šuma. Predmetnu obavijest Vam proslijeđujem u privitku.

Molim vas da provjerite navode iz predstavke te da Vaše očitovanje dostavite ovom Uredu pozivom na gomju klasu i urudžbeni broj.

S poštovanjem,



Prilog: kao u tekstu

O tome obavijest:

- VIDRA - Veterani i društvena akcija

n/p gđa Vesna Grgić, predsjednica braniteljske udruge

53303 VLADA REPUBLIKE HRVATSKE URED PREDSEDNIKA VLADE REPUBLIKE HRVATSKE Z A G R E B		VIDRA – Veterani i društvena akcija	
Datum: 03-01-2019		Trnjanska cesta 72, 10000 Zagreb OIB 90260251083 IBAN: HR5124020061100845708 GSM 095 925 3766	
Poslao:		Odbor:	
Poslao:		60302	
Poslao:		Pri: Vi:	

VLADA REPUBLIKE HRVATSKE

Zagreb, 3.siječnja 2019.

n/r

Gosp. ANDREJ PLENKOVIĆ

Trg svetog Marka 2

10000 Zagreb

Predmet:

Informacija o mogućim ozbiljnim nepravilnostima u gospodarenju hrvatskim šumama od strane „Hrvatskih šuma“ d.o.o, mogućim ozbiljnim odstupanjima u provođenju Plana gospodarenja hrvatskim šumama, te mogućem otuđenju i prikrivanju otuđenja velike količine državnih resursa i društvene imovine – hrvatskih šuma

Poštovani,

Zeleni odred, forum braniteljske udruge „VIDRA-Veterani i društvena akcija“ posljednjih nekoliko mjeseci provodi intenzivnu akciju prikupljanja svjedočanstava, dokaza i stručnih mišljenja koji u velikoj mjeri ukazuju na, usudujemo se reći, organiziranu zločinačku aktivnost usmjerenu ka pustošenju, preprodaji i rasprodaji hrvatskog prevrijednog blaga – hrvatskih šuma, gdje se šteta počinjena Hrvatskoj na godišnjoj razini mjeri milijunima eura i u stalnom je porastu.

Budući da uočavamo moguću poveznicu ovog, po našem mišljenju, programiranog i progresivnog razaranja hrvatskog šumskog fonda sa najvišim državnim tijelima, kao i najviše rangiranim predstavnicima državne vlasti, sukladno našoj građanskoj dužnosti i legitimnom pravu, o svemu smo 13. prosinca 2018. izvijestili Državno odvjetništvo republike Hrvatske. Također, budući da su državne šume dane na upravljanje, korištenje i gospodarenje javnom poduzeću „Hrvatske šume“ d.o.o., a u smislu mogućeg nepoštivanja pozitivnih zakonskih odredbi Republike Hrvatske, te sumnje u organizirani kriminal i korupciju, 18. prosinca 2018. prijavu smo predali i Uredu za suzbijanje korupcije i organiziranog kriminaliteta.

Navodimo smo neke od uočenih nelogičnosti i mogućih nezakonitosti koje bi mogle voditi ka potpunoj devastaciji naših šuma sa nesagledivim posljedicama:

Regarding the criminal report for the devastation of Mt. Medvednica submitted on January 29, 2020 to the State Attorney's Office, on March 3 we received a letter from the State Attorney's Office, Office for the Suppression of Corruption and Organized Crime, Number: KR-US-2020, AT / AT, sent to the District Attorney's Office:

"Pursuant to Art. 205, paragraph 4 of the Criminal Procedure Code, for further competent proceedings we submit in attachment a criminal report of the association 'Vidra'-Association of Veterans and Social Action, filed by the president of the association Vesna Grgić, against Krunoslav Jakupčić, President of the Management Board of Hrvatske šume d.o.o. (Croatian Forest Ltd), Damir Miškulin Head of the Zagreb Branch Forest Administration, Ivica Dugački manager of the Zagreb Forest Office and Zvonko Gregurević, manager of the Donja Stubica Forest Office, since the content of the criminal report does not indicate the characteristics of criminal offenses within the competence of this Office, but may be criminal offenses within your actual and local jurisdiction."

This completes our direct and indirect correspondence with the competent authorities, and we have no information about any of their further steps.

Until the time of compiling this report, our only knowledge is that forests on Mt. Medvednica, but also in other parts of the Republic of Croatia are being destroyed at a frightening, accelerated pace, regardless of whether the devastated areas are in the Natura 2000 protection regime or not.



REPUBLIKA HRVATSKA
DRŽAVNO ODVJETNIŠTVO
URED ZA SUZBIJANJE KORUPCIJE
I ORGANIZIRANOG KRIMINALITETA
Zagreb, Vlaška ulica 116

Broj: KR-US-272/2020
Zagreb, 03. ožujka 2020.
AT/AT

ŽUPANIJSKO DRŽAVNO ODVJETNIŠTVO U ZAGREBU

ZAGREB

Na temelju čl. 205. st. 4. Zakona o kaznenom postupku, u privitku vam na daljnje nadležno postupanje dostavljamo kaznenu prijavu udruge Vidra – veterani i društvena akcija, podnesenu po predsjednici udruge Vesni Grgić, protiv Krunoslava Jakupčića, predsjednika uprave Hrvatskih šuma, Damira Miškulina, voditelja Uprave šuma podružnice Zagreb, Ivice Dugačkog, upravitelja Šumarije Zagreb i Zvonka Gregurevića, upravitelja Šumarije Donja Stubica, budući da iz sadržaja kaznene prijave ne proizlaze obilježja kaznenih djela iz nadležnosti ovog Ureda, već bi se eventualno radilo o kaznenim djelima iz vaše stvarne i mjesne nadležnosti.

S poštovanjem,

ZAMJENICA RAVNATELJICE

Ana Tostenjak



Privitak:

- kao u tekstu

O tome obavijest:

- 1) Udruga Vidra – veterani i društvena akcija, Trnjanska cesta 71, Zagreb

During the process of revealing and proving corruption, crime and devastation of our forests, we forwarded all findings and documents to the Office of the Ombudsman Lora Vidović, who promptly, ex officio, sent inquiries to the competent institutions and demanded their statements. Without exception, the official responses were general, with the intention of concealing the true situation, i.e. carrying out illegal forest management activities.

One of the examples is the statement of the State Inspectorate CLASS: 321-10 / 19-01 / 908, UR: NUMBER: 442-06 / 1055-19-2 of 10 June 2019. The State Inspectorate reports in a very brief letter to the Office of the Ombudsman on performed inspections from 1 January 2017 to 1 May 2019 in the area of Medvednica forests, and does not report a single word to the Office on illegal forest management without approved Management Plans!



REPUBLIKA HRVATSKA
DRŽAVNI INSPEKTORAT

Zagreb, Šubićeva 29
KLASA: 321-10/19-01/908
UR. BROJ: 443-06/1055-19-02
Zagreb, 10. lipnja 2019. godine



REPUBLIKA HRVATSKA
URED PUČKOG PRAVOBRANITELJA

Primljeno: 21. 6. 2019.		
Broj predmeta: Osn. redni broj / godina	Br. osn. činjenice / ustroj jedinica / službenik	
P.P. - 6 - 1 - 278 / 19 - 16 - 12		
Uzn. sadržaj / diskriminacija	Br. priloga	Br. listova

PUČKI PRAVOBRANITELJ
n/p Lidije Lukina Kezić, zamjenice pučke
pravobraniteljice
Trg hrvatskih velikana 6
10 000 Zagreb

PREDMET: Medvednica – zahvati na zaštićenim područjima i nezakoniti radovi u šumama
- očitovanje, dostavlja se

Veza: Vaš broj: P.P.6-1-278/19-16-10, od 17.5.2019.

Poštovana,

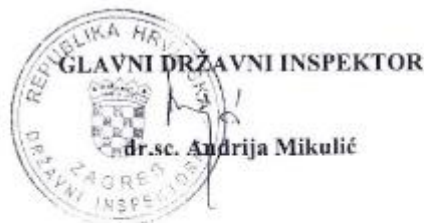
sukladno Vašem gore navedenom dopisu, koji smo zaprimili 29.5.2019. godine, a kojim molite očitovanje i postupanje o evidentiranim nezakonitim radovima u šumama na Medvednici u razdoblju od početka 2017. godine do 1. svibnja 2019. godine te poduzetim mjerama iz nadzora šumarske inspekcije, očitujemo se kako slijedi.

Šumarska inspekcija Državnog inspektorata u okviru svoje nadležnosti kontinuirano i planski provodi inspekcijske nadzore provedbe i primjene zakonskih odredbi iz Zakona o šumama („Narodne novine“ broj 68/18., 115/18.), odnosno načina gospodarenja šumama i šumskim zemljištima od strane šumoposjednika.

Šumarska inspekcija je u razdoblju od 1. siječnja 2017. godine do 1. svibnja 2019. godine u šumama na području Medvednice izvršila ukupno 36 inspekcijskih nadzora te je donijela 2 rješenja o otklanjanju nepravilnosti.

S poštovanjem,

Dostaviti:
-naslovu
-pismohrana

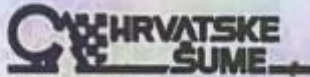


At the same time, the President of the Management Board of Hrvatske šume d.o.o. (Croatian Forests Ltd.) sends a letter Class: DIR-19-01 / 2546, Reg. No: 00-01 / 01-19-01 dated 10 June 2019 to all heads of the Croatian Forests Administration stating:

"At a meeting at the State Inspectorate held on June 5, 2019 on the request of the Chief State Inspector Hrvatske šume d.o.o. (Croatian Forests Ltd.) have been informed that they will not be able to perform any work in Management Units for which they do not have approved Forest Management Plans..." and "As the legal deadline (June 30, 2019) for submitting for approval Forest Management Plans to the Ministry of Agriculture approaches , the validity of which begins on January 1, 2019, we would like to warn you that non-compliance with this deadline, except for inability to perform works, is subject to sanctions..."

It is scandalous to not specified the violation of the obligation to adopt Forest Management Plans whose validity expired on 31 December 2017, which had to be completed on 30 June 2018!

See more details on the page 48



društvo s ograničenom odgovornošću
Uprava: Krunoslav Jakupčič, dipl. ing. šum. – predsjednik; Ante Sabljčić, dipl. ing. šum. – član, mr.sc. Igor Fazekas, član
• Trgovački sud u Zagrebu (MBS 080251008) • MB 3631133 • OIB 69693144506 • IBAN: HR46 2340 0091 1001 0036 0 • SWIFT: PBZGHR2X • Temeljni kapital 1.171.670.000,00 kn, uplaćen u cijelosti • Telefon: 01/4804 111 • Telefax: 01/4804 101 • pp 148, 10002 Zagreb • web: <http://www.hrsume.hr> • e-mail: direkcija@hrsume.hr

Klasa : DIR-19-01/2546

Ur.broj : 00-01/01-19 - 01

Zagreb, 10.06.2019.

N/R VODITELJA PODRUŽNICA 1- 17

Poštovani Voditelji,

Na sastanku u Državnom inspektoratu održanom 5.6.2019. na zahtjev Glavnog državnog inspektora Hrvatske šume d.o.o. obaviještene su da neće moći obavljati radove u gospodarskim jedinicama za koje nemaju odobrene šumskogospodarske planove, te da će Državni inspektorat nakon 30.6.2019. godine obaviti kontrolu njihove pravovremene dostave na odobrenje u Ministarstvo poljoprivrede.

Obzirom da se približava zakonski rok (30.6.2019.) za dostavu na odobrenje u Ministarstvo poljoprivrede šumskogospodarskih planova čija valjanost započinje sa 1.1.2019. godine želimo Vas upozoriti da nepoštivanje tog roka, osim nemogućnosti obavljanja radova, podliježe sankcijama propisanim člankom 81. Zakona o šumama (Narodne novine broj: 68/2018., 115/2018.).

Temeljem navedenog zadužuju se Voditelji UŠP da poduzmu potrebne mjere koje će rezultirati pravovremenom dostavom šumskogospodarskih planova na odobrenje u Ministarstvo poljoprivrede.

Za nepravovremenu dostavu šumskogospodarskih planova na odobrenje u Ministarstvo poljoprivrede odgovorni su Voditelji UŠP.

S poštovanjem,

Predsjednik Uprave HŠ d.o.o.

Član Uprave HŠ d.o.o.

Dostaviti:

1. Kao u Naslovu
2. Sektor za šumarstvo
Služba za Uređivanje

Exactly one year ago, on October 8, 2019, at the Extraordinary Session of the Croatian Parliament, which was attended by Prime Minister Andrej Plenković, all line ministers and the then President of the Republic of Croatia Kolinda Grabar Kitarović we exposed the problem of forests devastation, with special emphasis on quantity and perpetrators. On that occasion, Prime Minister Plenković stated that he was aware of the problem, and gave the floor to the Minister of Agriculture Marija Vučković to answer the question why none of the authorities has yet taken any legal measures to prevent further ecocide.

Minister Vučković's response was, to put it mildly, scandalous. In short, Minister Vučković denied any connection or guilt of Hrvatske šume d.o.o. , and as the main argument for not conducting an official investigation, she stated the fact that our data on which we base the lawsuit differ significantly from the data presented by Hrvatske šume d.o.o. Minister Vučković publicly told a notorious lie! All our evidence and all our claims that Hrvatske šume d.o.o. are the main executor in the devastation are based on the original documents from the business and accounting records of Hrvatske šume d.o.o.

We remind you: **the Minister of Agriculture Marija Vučković is also the president and the only member of the Assembly of Hrvatske šume d.o.o.!**

Watch the video: The Green Squad in the Croatian Parliament:

<https://youtu.be/oImTkio4oo?t=2>

Misuse of EU Funds

1. One of the obligations of Hrvatske šume d.o.o., as a state company entrusted with the task of managing state forests, is to carry out works on biological regeneration of forests. Silvicultural operations are financed partly by Hrvatske šume d.o.o. and partly from the resources assigned under the law, primarily under the Forest Act, through payments of the Forest Public Benefit Function Fee. The financial resources thus collected are strictly assigned funds, and the works on biological regeneration of both state and private forests are partly financed from those funds.

Despite the fact that Hrvatske šume d.o.o. has been allocating for years only around 35% of the profit from their core business, i.e. production and sale of wood assortments to biological regeneration, the RH Government, with its constant changes of regulations stipulating ways and amounts of collecting means for the Forest Public Benefit Functions, it keeps reducing the means for the works on biological regeneration of forests. With its latest modifications of the Forest Act, which provides that the strictly assigned resources shall be used for that purpose only, the Government decides to allocate those resources to remediation of impacts of COVID-19 and reducing of damages caused by the earthquake in Zagreb!

The Government plans to compensate the deficit in the Forest Public Benefit Functions fund - from the EU funds. By the way, the share of resources from the EU funds allocated for that particular purpose is higher every year, from 1.62% in 2018 to 16.67% in 2020.

Here we must point out that the documents based on which Hrvatske šume d.o.o. obtain EU funding and grants are false in most cases, that is, by way of numerous budget revisions of planned and completed works, the company's results are presented as much better than they really are. In addition, new amendments to the Forest Act will enable and simplify the transfer of funds intended exclusively for biological regeneration of forests to who knows what other purposes.

An example of failure to implement regulations related to the biological regeneration of forests is the economic unit of **Sljeme-Medvedgradske šume on Mt. Medvednica**, where, following the inventory of wood mass taken in the period 2008-2017, out of 22.10 hectares prescribed for sowing and planting, only 6.10 hectares were used for that purpose, i.e. only 27.5%!

Also, it is important to mention the following: the inventory taken in the same period of the wood mass at the abovementioned economic unit Sljeme-Medvedgradske šume found the enormous deficit of 136,277 m³ of wood mass deficit.

Economic unit Sljeme-Medvedgradske šume is included in the protection regime of the Natura 2000 network.

2. EU funds indirectly aimed and used to carry out forest devastation.

Rural Development Program 2014-2020 conducted by the Ministry of Agriculture, and funded by the European Agricultural Fund for Rural Development, has enabled the procurement of machinery to many external associates of Croatian Forests for the purpose of performing works in forests.

Hrvatske šume d.o.o. (Croatian Forests Ltd.) selects external associates mainly through pre-agreed tenders and negotiates timber supply quotas with them. However there is a complete lack of control over the amount of harvested wood mass and whether that amount exceeds pre-established quota. We have seen countless times on the spot that the external associates unscrupulously take advantage of the mentioned lack of control to extract huge amounts of wood mass, carrying out forest devastation in unlimited quantities with machines financed by EU funds.

One of the examples of ruthless devastation of Žumberačko Gorje, an area in the regime of protection by the econetwork Natura 2000.



Proposed Solutions

We have been witnessing for years, and recently we have proved that in the Republic of Croatia the planned and ruthless devastation of all types of forests is being carried out, including those under special regimes of national protection or the econetwork Natura 2000.

Since the systematic implementation of ecocides in the Republic of Croatia is designed at the highest levels of executive power, Governments and Ministries, with the support of the State Inspectorate, Police and Judicial institutions, we can freely say that this is a joint criminal activity with the main goal of achieving illegal material gain, to the detriment of the Republic of Croatia and indirectly due to the loss of valuable forest treasures to the detriment of the EU.

In our opinion, the ecocide in the Republic of Croatia can be stopped by the following measures:

1. Complete, multi-year ban on all logging on the territory of the Republic of Croatia
 2. By conducting the National Inventory of all forests and forest lands in the Republic of Croatia
 3. Obligation to afforest all severely devastated areas
 4. By sanctioning all organizers and perpetrators of ecocides
-

APPENDICES

1. ILLEGAL FOREST MANAGEMENT WITHOUT APPROVED MANAGEMENT PLANS

Example of illegal conduct in the work of Hrvatske šume d.o.o.:

Renewal or revision of the ten-year Forest Management Plan for each Management Unit begins in the last year of the current plan and ends in the first half of the first year of the new ten-year Plan or Program.

Eg. According to this management plan, the plans whose validity expired in 2017 had to be renewed no later than the second half of 2017 or by 30.06.2018.

At the end of December 2018, Hrvatske šume did not have Forest Management Plans that had to be approved by an administrative act of the Ministry of Agriculture, although they were required to do so, therefore Hrvatske šume managed forests and forest lands outside the prescribed legal framework.

Number of Forest Management Plans whose validity period expired on 31.12.2017. There were 72, and out of those 72 forest management plans, only 4 of them were renewed and approved by an administrative act - a decision by the Ministry of Agriculture. Therefore, 68 economic units did not have an approved Management Plan and were managed illegally. The last deadline by which the Plans were to be renewed was June 30, 2018. years.

When the Management Plans whose expiration date expired on 31.12.2017 are added to all the Plans whose validity period expired on 31.12.2018., there is a scandalous fact that 20% of the area of forests and forest lands almost by the end of 2019 was outside the legal management.

A comprehensive review of renewal of management plans dynamics by Management Units whose plans expired in 2017 and 2018 showed that 16 (out of 17) branches of the Forest Administration did not comply with legal provisions on timely submission of requests for approval of Management Plans to the Ministry of Agriculture. During the period from the expiration of the old Plans, to the time of approval of new ones by the Ministry of Agriculture, the activities of felling, extraction and sale of timber were performed illegally, and material gain was made in an illegal manner.

Also, it is quite certain that the Ministry of Agriculture, by issuing an administrative act – Decisions, issued only in 2019 confirming the validity of the new Management Plans from 1 January 2018, basically "covered up" the illegal operations of Hrvatske šume d.o.o. (Croatian Forests Ltd.) in the period from the expiration of Plans 31 .December 2017 until the date when the Basics were officially approved by the Decision.

2. THE PLAN FOR EXCESSIVE HARVEST OF FORESTS AT THE STATE LEVEL

The 2016-2025 Forest Management Plan for the forest management area of the Republic of Croatia (HR) reveals that the total presented ten-year increment of productive forests shall amount to 55,055,870 m³, which implicates that the planned harvesting of 64,196,393 m³ will considerably exceed the increment, i.e. by 116.6%!

The planned harvest with this percentage thus means planned desolation!

From the above it is clear that, by their 2016-2025 Forest Management Plan, Hrvatske šume d.o.o. (Croatian Forests Ltd.) have foreseen excessive harvesting!

In spite of numerous proofs that the excessive harvesting of forests was pre-planned, Director of Forestry Sector of Hrvatske šume d.o.o., Mr. Krešimir Žagar; Director of Hrvatske šume Administration, Mr. Krunoslav Jakupčić; the Head of the Zagreb Office of Forest Administration and many others, have more than once publicly stated that Hrvatske šume d.o.o. manage exclusively productive forests, that logging in the Republic of Croatia never exceeds 2/3 of the increment and that, consequently, the forest fund has been larger every year.

The truth about the excessive harvesting is supported by the fact that Hrvatske šume d.o.o. manages forests and forest land in the Republic of Croatia in the way that is contrary to the existing laws and professional practices, This was established already in 2014 in the internal document issued by the Forestry and Hunting Inspectorate on 7 July 2014, including the following:

"Starting in October 2013, in accordance with the 2006-2015 Forest Management Plan, an inspection was conducted of harvesting and logging of wood stock in the state forests managed by Hrvatske šume d.o.o. The findings include illicit deviations and regular annual logging overruns in quantities higher than 1,000,000 hectares a year, carried out in unplanned forest areas larger than 10,000 hectares, covering economic units of central and mountainous parts of Croatia, particularly in the areas managed by the Forest Administration offices of Zagreb, Bjelovar, Koprivnica, Nova Gradiška, Sisak, Karlovac and Delnice."

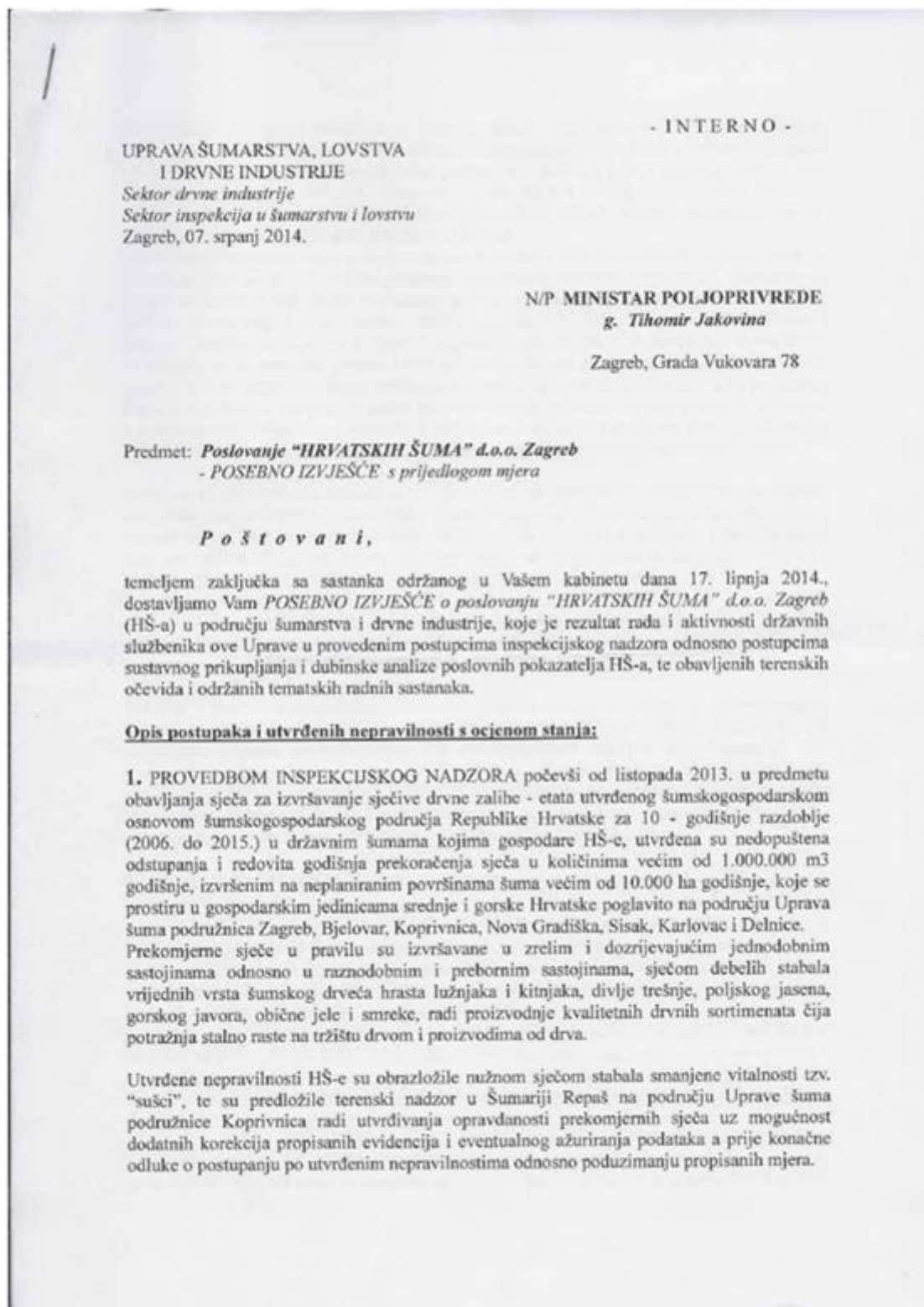
The inspection was conducted following the decision of then Minister of Agriculture, Mr. Tihomir Jakovina. The report included the note: „In-house distribution“:

"... Pursuant to the decision reached at the meeting held in your office on 17 June 2014, please find enclosed SPECIAL REPORT on the business activities of Hrvatske šume d.o.o. (HŠ) related to forestry and forest-based industry..."

Mr. Tihomir Jakovina, who held the position of the Minister of Agriculture in the government of the then Prime Minister Zoran Milanović, denied receiving such a report, while the harvesting prescribed by the report actually escalated into even worse devastation instead of being reduced. Despite the fact that Special Report (which also mentioned that the damage incurred until then amounted to approx.

EUR 54 million) was publicly disclosed in the media, its existence was completely ignored both by the next Minister of Agriculture, Mr. Tomislav Tolušić and his successor, Ms. Marija Vučković.

Continuous hushing up and ignoring of the negative findings of the audit and inspection reports over the last decade, has resulted in further excessive harvesting and catastrophic deficit in wood stock at the state level of at least 17,000,000 m³, worth around EUR 1 billion.



3. Examples of Forest Management Plans with excessive logging where planned harvesting is significantly higher than the forest increment:

1. Forest Management Unit DUBOKI JARAK, Forest Office: Dugo Selo, Forest Administration Zagreb, logging planned for the period 2019-2028 is **109.1%** of the presented ten-year rate growth.

2. Forest Management Unit BUKOVAC, Forest Administration Bjelovar, Forest Office Vrbovec:

The Ministry of Agriculture, by Decision CLASS: UP / I-321-03 / 14-01 / 86, REGISTRATION NUMBER: 525-11 / 1069-14-5, from 17 November 2014, approves the Management Plans for the Forest Management Unit "Bukovac" from 2014 to 2023, although it is clear that the ratio between planned harvesting and forest increment is as much as **130.3%**! So the devastation of the Management Unit is still ongoing!

The decision approving the ecocide in the Bukovac Management Unit was signed by Tihomir Jakovina, the then Minister of Agriculture in the Government of Prime Minister Zoran Milanović.

Follows the video of partial devastation of the Management Unit Bukovac:

<https://youtu.be/revZRKjfUFo>



REPUBLIKA HRVATSKA
MINISTARSTVO POLJOPRIVREDE

10000 Zagreb, Planinska 2A

KLASA: UP/I-321-03/14-01/86
URBROJ: 525-11/1069-14-5
Zagreb, 17. studenoga 2014. godine



REPUBLIKA HRVATSKA
HRVATSKE ŠUME

Primljeno:	26.11.2014. 8:21:06		
Klasifikacijska oznaka	Org. jed.		
DIR-14-2827	06		
Uredbeni broj:	Pril.	Vrg.	
DIR-06-14-2827/05			



0236191

Ministarstvo poljoprivrede, na osnovu članka 22. Zakona o šumama ("Narodne novine", broj 140/05, 82/06, 129/08, 80/10, 124/10, 25/12, 68/12 – Odluka Ustavnog suda RH, 148/13 i 94/14) te članka 96. stavka 1. Zakona o općem upravnom postupku ("Narodne novine", br. 47/09.), povodom zahtjeva trgovačkog društva "Hrvatske šume" d.o.o. Zagreb za davanje odobrenja na Osnovu gospodarenja gospodarskom jedinicom "BUKOVAC" donosi

RJEŠENJE

I. Odobrava se Osnova gospodarenja gospodarskom jedinicom "BUKOVAC" za razdoblje od 1. siječnja 2014. do 31. prosinca 2023. godine

Obrazloženje

"Hrvatske šume" d.o.o., temeljem članka 22. stavka 1. i 3. Zakona o šumama podnijele su Ministarstvu poljoprivrede, zahtjev Klasa: 321-03/14-03/05; Ur.broj: DIR-06TS-14-2827/02 od 8. svibnja 2014. godine za davanje odobrenja na Osnovu gospodarenja gospodarskom jedinicom "BUKOVAC".

Prema odredbi članka 22. stavka 1. Zakona o šumama, Šumskogospodarske planove, njihovu obnovu ili reviziju odobrava Ministarstvo.

Odobrenje se daje na osnovu mišljenja stručnog povjerenstva da je Osnova gospodarenja izrađena u skladu sa Zakonom o šumama, Pravilnikom o uređivanju šuma u daljnjem tekstu Pravilnik i odredbama Šumskogospodarske osnove područja.

Stručno povjerenstvo imenovano od strane ministra sastalo se i radilo je u uredu i na terenu te utvrdilo da je predmetna Osnova gospodarenja izrađena u skladu s odredbama Zakona o šumama, Pravilnika o uređivanju šuma i Šumskogospodarske osnove područja.

4. Examples of Excessive Logging in Management Units under the Natura 2000 protection regime:

1. Management Unit Žutica, Forest Office Novoselec, Forest Administration Zagreb, ten-year increment is 316,130 m³, ten-year logging plan is 301,528 m³, which indicates that in MU Žutica planned harvesting is equal to 95.4% of the total forest increment, i.e. planned harvest almost coincides with increment!

In the Management Plans approved by the Ministry of Agriculture, but also by the Ministry of Economy and Sustainable Development (ex Ministry of Environmental Protection) from the paragraph "Biological Restoration Works" it is clear that previously unjustified clearcutting has been already done because the approved Plan envisages "filling with reproductive material" on 183.93 ha and "planting after clearcutting - afforestation" on 135 ha.

Review of the table Accounting Control of Growing Stock for the period 2008-2017 there is a catastrophic growing stock shortage of 192,344 m³!

2. Management Unit STUBIČKA GORA, Forest Office Donja Stubica, Forest Administration Zagreb.

In the management plans, the ten-year increment is 80,070 m³, and the ten-year logging plan is 74,311, which indicates that the planned logging for the period 2018-2027 is a huge 92.8% of the forest increment.

Forest growing stock on 1.1.2018. shows a huge deficit of 57,634 m³ in relation to the condition ten years ago.

In these examples, but also in all other cases where the Business Plans of Management Units of Hrvatske šume d.o.o. (Croatian Forests Ltd.) show high percentages of logging in relation to forest increase, as well as the huge deficit of wood mass in the previous ten-year period, the Ministry of Agriculture and the Ministry of Economy and Energy without exception issue a Decisions that approve further management, without conducting deficiency investigations, or investigation for planning excessive and illegal logging!



REPUBLIKA HRVATSKA
MINISTARSTVO ZAŠTITE OKOLIŠA
I ENERGETIKE

10000 Zagreb, Radnička cesta 80
Tel: 01/ 3717 111 fax: 01/ 3717 149

KLASA: 612-07/18-04/44
URBROJ: 517-05-2-3-19-10
Zagreb, 16. rujna 2019.

PRIJEMNI ŠTAMPILJ
HRVATSKE ŠUME

društvo s ograničenom odgovornošću

Primljeno: 17.09.2019. 09:51 h	Organizacijska jedinica
Klasifikacijska oznaka	07-00-05
ZG/18-01/2120	Prilogi
Uredbeni broj	Vrijednost
99-19-12	0



thFHeBeOn0-epqxcS7IHUA

„HRVATSKE ŠUME“ d.o.o.
Ulica kneza Branimira 1
10 000 Zagreb

PREDMET: Nacrt Programa gospodarenja gospodarskom jedinicom „STUBIČKA GORA“ s planom upravljanja područjem ekološke mreže
- suglasnost, izdaje se

Ministarstvo zaštite okoliša i energetike temeljem članka 56.b stavka 3. Zakona o zaštiti prirode (Narodne novine, br. 80/13, 15/18, 14/19) nakon uvida u dostavljeni doradeni nacrt Programa gospodarenja gospodarskom jedinicom „STUBIČKA GORA“ s planom upravljanja područjem ekološke mreže čija je važnost od 01. 01. 2018. do 31. 12. 2027. godine, izdaje

suglasnost

da je nacrt Programa gospodarenja gospodarskom jedinicom „STUBIČKA GORA“ s planom upravljanja područjem ekološke mreže čija je važnost od 01. 01. 2018. do 31. 12. 2027. godine, izrađen u skladu s odredbama članka 56. stavaka 3. i 4. Zakona o zaštiti prirode.

Ministarstvo zaštite okoliša i energetike zaprimilo je 28. prosinca 2018. godine od strane trgovačkog društva „HRVATSKE ŠUME“ d.o.o., Ulica kneza Branimira 1, 10000 Zagreb (dalje u tekstu: Hrvatske šume d.o.o.) kao nositelja izrade Programa gospodarenja gospodarskom jedinicom „STUBIČKA GORA“ s planom upravljanja područjem ekološke mreže čija je važnost od 01. 01. 2018. do 31. 12. 2027. godine (dalje u tekstu: Program), zahtjev za izdavanjem suglasnosti na nacrt Programa (KLASA: ZG/18-01/2120 UR. BROJ: 00-02-02/02-18-02). Uz zahtjev i nacrt Programa bila je priložena i popratna dokumentacija.

Po zaprimljenom zahtjevu Hrvatskih šuma d.o.o., ovo Ministarstvo je sukladno članku 56.b stavku 3. Zakona o zaštiti prirode (Narodne novine, br. 80/13, 15/18) dopisom (KLASA: 612-07/18-04/44 URBROJ: 517-05-2-3-19-2) od 03. siječnja 2019. godine zatražilo mišljenje na nacrt Programa od strane Hrvatske agencije za okoliš i prirodu.

Ministarstvo zaštite okoliša i energetike u skladu s poslovima određenim člankom 73. stavcima 1. i 5. Zakona o izmjenama i dopunama Zakona o zaštiti okoliša („Narodne novine“, broj 118/18) dostavilo je traženo mišljenje 09. svibnja 2019. godine (KLASA: 612-07/19-25/02


REPUBLIKA HRVATSKA
MINISTARSTVO POLJOPRIVREDE
10000 Zagreb, Pleninska 2a

KLASA: UP/I-321-03/18-01/149
URBROJ: 525-11/0592-19-6
Zagreb, 17. rujna 2019. godine

PRIJEMNI ŠTAMBLJ
HRVATSKE ŠUME

društvo s ograničenom odgovornošću

Primljeno: 20.09.2019., 11:37 h		
Klasifikacijska oznaka:	Organizacijska jedinica:	
ZG/18-01/2120	07-00-05	
Uredbeni broj:	Prilozi:	Vrijednost:
99-19-13	0	



ICRdgr3SfEmfiq7FCs9h6g

Ministarstvo poljoprivrede na temelju čl. 29. st. 1. i čl. 98. st. 1. Zakona o šumama ("Narodne novine", br. 68/18. i 115/18.) i članka 96. stavka 1. Zakona o općem upravnom postupku ("Narodne novine", br. 47/09.), po zahtjevu Hrvatskih šuma d.o.o. Zagreb za odobrenje Programa gospodarenja gospodarskom jedinicom „STUBIČKA GORA“ s planom upravljanja područjem ekološke mreže, d o n o s i

RJEŠENJE

1. Odobrava se obnova Programa gospodarenja gospodarskom jedinicom „STUBIČKA GORA“ s planom upravljanja područjem ekološke mreže za razdoblje od 1. siječnja 2018. do 31. prosinca 2027. godine.

Obrazloženje

Hrvatske šume d.o.o. Zagreb, podnijele su na temelju 29. st. 6. Zakona o šumama ("Narodne novine", br. 68/18. i 115/18.) zahtjev za odobrenje Programa gospodarenja gospodarskom jedinicom „STUBIČKA GORA“ s planom upravljanja područjem ekološke mreže KLASA: ZG/18-01/2120, URBROJ: 00-02-02/02-18-04 od 27. prosinca 2018. godine. Zahtjev je osnovan.

Prema čl. 29. st. 1. Zakona o šumama šumskogospodarski plan, njegovu obnovu ili reviziju Ministarstvo odobrava rješenjem i to za šume i šumska zemljišta u vlasništvu Republike Hrvatske na prijedlog javnog šumoposjednika, Ustanove ili Pravne osobe, a za šume privatnih šumoposjednika na prijedlog licenciranih izvodača.

Prema čl. 29. st. 6. Zakona o šumama šumskogospodarski planovi te njihova obnova ili revizija odobrava se na temelju mišljenja povjerenstva o njihovoj usklađenosti s Osnovom područja i odredbama ovoga zakona, a Povjerenstvo iz reda šumarskih stručnjaka osniva ministar.

Ministar je zaključkom KLASA: UP/I-321-03/18-01/149, URBROJ: 525-11/1065-19-3 od 10. svibnja 2019. godine osnovao povjerenstvo koje se sastalo i radilo 28. i 29. svibnja 2019. god. u uredu i na terenu Uprave šuma Podružnice Zagreb, šumarije Donja Stubica.

Povjerenstvo je pregledalo obnovljeni Program gospodarenja gospodarskom jedinicom „STUBIČKA GORA“ s planom upravljanja područjem ekološke mreže i utvrdilo da je izrađen u skladu s odredbama Šumskogospodarske osnove područja, Zakona o šumama, Pravilnika o uređivanju šuma („Narodne novine“ broj: 79/15.) i da sadrži sve dijelove propisane čl. 58. do čl. 68. Pravilnika o uređivanju šuma.

Note:

We have attached to this report only some of the documents that indicate the fact that the Croatian institutions were familiar with the whole construct of association in the implementation of devastation plans and in realization of illegal material benefits in the Republic of Croatia.

We are ready to provide you with a large number of collected documents, analyzed satellite images and photo materials at your request at a later date.

.....