



Virginijus Sinkevičius  
Commissioner for Environment, Oceans and Fisheries

Brussels, 14/09/2021

Subject: State of the Forest during a field visit to CRNA MLAKA, VAROŠKI LUG and BILOGORA in Croatia

Dear Commissioner Sinkevičius,

I am writing to you to report on the alarming state of Croatian forests notably the area of Crna Mlaka, south of Zagreb. During a field visit with the NGO „The Green Squad“, I witnessed several worrying breaches of the Natura 2000 regulation and the Ramsar convention.

I was particularly shocked by the state of the Ornithological Reserve Crna Mlaka since it is a large wet- and lowland with unique hydrographic, vegetational characteristics and beautiful biodiversity. It is a significant area for migratory and wintering birds. According to the reports of the NGO „Green Squad“ the Croatian State Forestry agency Hrvatske Šume d.o.o is responsible for the deforestation of approximately 3,243 ha of forests in Crna Mlaka even though they are protected under the Natura 2000 regulatory framework. I have seen the destruction with my own eyes and enclosed visual evidence to this letter. A detailed long-term analysis of ecological devastation has been carried out by the NGO „Green Squad“ and their head Vesna Grgić, see „Report on Deforestation in the Republic of Croatia“ from October 2021 page 6 to 9.

The clear cuts have been carried out with massive machinery, everything has been canalised and flattened which dries out the wetlands therefore emitting tons of CO<sub>2</sub> instead of sequestering CO<sub>2</sub> with the help of trees. This is exactly the opposite of what the Green Deal and Biodiversity Strategy is about!

On a small area next to the clear cuts we found an informational board that stated the usage of European funds namely from the Rural Development Program. While the clear cut should have never happened in the first place, the afforestation efforts are a mockery. When checking the plastic tubes containing the newly planted trees, the tubes were empty or completely dried out. I am urging you to make inquiries on how much European tax money has been used in this pointless attempt of afforesting this area and why it does not match the clear cut.

While inspecting the clear cuts in the former wetland of Crna Mlaka I have seen a red listed, endangered yellow-bellied toad. This mean that the clear cuts not only killed probably hundreds of these endangered Amphibia but that it destroyed endangered biodiversity and the habitat of many other enriching species.

During my visit we also stopped in Varoški lug a special zoological reserve east of Zagreb which is protected under Natura 2000 as well as the Ramsar convention. We have documented another site of massive clear cuts, especially notably the speed of which the clear cuts have been carried out. Varoški lug amounts to approximately 866 Hektar. By analyzing satellite images, we found that Hrvatske šume d.o.o enforced clear-cutting of 290 ha (approximately 33%) of the area under protection. Of that, about 60 ha have been completely clear-cut in the past 3 years only, merely leaving a handful of trees to trick the system and regulations in place.

The area of Bilogora is a low mountainous range in central Croatia with a blooming biodiversity, bees, and beavers. According to careful analysed satellite images from 2013 and 2019 a total of approximately 2000 ha were clear cut in the entire area of Bilogora resulting in 40% less bees and other heavy biodiversity implications not to speak about soil erosion and damage to the remaining trees through heavy machinery.

In light of the Forest strategy for 2030 that was published in July 2021 with the goal to improve the quantity and quality of European forests, this evidence is especially alarming. My findings during my visit are directly contradicting the goals of the new EU forest strategy for 2030, which „recognises the central and multi-functional role of forests, and the contribution of foresters and the entire forest-based value chain for achieving by 2050 a sustainable and climate-neutral economy while ensuring that all of ecosystems are restored, resilient, and adequately protected.”<sup>1</sup>The visit also showed that there is a dire need of a European Forest Strategy that puts the environmental value of forests and not its economical value first.

Following the „Report on Deforestation in the Republic of Croatia“ from October 2020 by Vesna Grgić you reached out to the competent authorities to react to the accusations as part of infringement procedures. Can you give an update on the state of these inquiries?

Please also find pictures attached from the areas affected in this folder:

<https://team.tomwaitz.eu/s/5Txp9ePGE3XAQY9>

Sincerely

Thomas Waitz

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<sup>1</sup> New EU Forest Strategy for 2030. Introduction.