



Centralized National Risk Assessment for Croatia

FSC-CNRA-HR V1-0 EN

Title:	Centralized National Risk Assessment for Croatia
Document reference code:	FSC-CNRA-HR V1-0 EN
Approval body:	FSC International Center: Performance and Standards Unit
Date of approval:	02 July 2020
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Risk assessments that have been finalized for Croatia

Controlled Wood categories		Risk assessment completed?
1	Illegally harvested wood	YES
2	Wood harvested in violation of traditional and human rights	YES
3	Wood from forests where high conservation values are threatened by management activities	YES
4	Wood from forests being converted to plantations or non-forest use	YES
5	Wood from forests in which genetically modified trees are planted	YES

Risk designations in finalized risk assessments for Croatia

Indicator	Risk designation (including functional scale when relevant)
Controlled wood category 1: Illegally harvested wood	
1.1	Low risk
1.2	N/A
1.3	Low risk
1.4	Specified risk for private forests. Low risk for the rest of the country.
1.5	N/A
1.6	Low risk
1.7	Low risk
1.8	Specified risk for private forests. Low risk for the rest of the country.
1.9	Specified risk for private forests without a Forest Management Plan. Low risk for the rest of the country.
1.10	Specified risk for private forests without a Forest Management Plan. Low risk for the rest of the country.
1.11	Specified risk for private forests. Low risk for the rest of the country.
1.12	Specified risk for private forests. Low risk for the rest of the country.
1.13	N/A
1.14	N/A
1.15	N/A
1.16	Low risk
1.17	Low risk
1.18	Low risk
1.19	Low risk
1.20	Low risk
1.21	Low risk
Controlled wood category 2: Wood harvested in violation of traditional and human rights	
2.1	Low risk
2.2	Low risk
2.3	Low risk
Controlled wood category 3: Wood from forests where high conservation values are threatened by management activities	
3.0	Low risk
3.1	Specified risk for private forests without a Forest Management Plan. Low risk for the rest of the country.
3.2	Specified risk for private forests without a Forest Management Plan. Low risk for the rest of the country.
3.3	Specified risk for private forests without a Forest Management Plan. Low risk for the rest of the country.
3.4	Specified risk for private forests without a Forest Management Plan. Low risk for the rest of the country.
3.5	Low risk

3.6	Low risk
Controlled wood category 4: Wood from forests being converted to plantations or non-forest use	
4.1	Low risk
Controlled wood category 5: Wood from forests in which genetically modified trees are planted	
5.1	Low risk

Risk assessments

Controlled wood category 1: Illegally harvested wood

Overview

Forest history and current objectives

Croatia is located in Central and Southeast Europe, on the coast of the Adriatic Sea. The total area of Croatia, with the territorial sea, is 88 073 km², while the state land territory covers 56 594 km² (lit 1).

Geomorphologic and climate differences between lowland, mountain, and coastal Croatia have resulted in a diversity of terrestrial, marine and underground habitats and a wealth of species (lit 2). There are more than 60 forest communities and around 4500 forest plant taxa in Croatia (lit 3). According to statistical data for 2018, forest land area covers 2 755 278 , which is around 48,6% of state land territory (lit 1). Forests cover 2 496 928 ha, which is 90% of forest land area (not all forest *lands* are thus covered with forests).

Broadleaved species are predominant and cover 84% of the forest lands, while conifer forests cover 16%. In the growing stock of forest stands dominate *Fagus sylvatica* (common beech – 37,22%), followed by *Quercus robur* (common oak – 11,55 %), *Quercus petraea* (sessile oak – 9,38%), *Carpinus betulus* (European hornbeam – 8,39%), and *Abies alba* (silver fir – 7,90%), with significant differences between various categories of ownership (lit 4).

The largest share of the total growing stock in the state forests has plain beech (39.50%), followed by common oak (13.35%), silver fir (9.62%), sessile oak (7.92%), and European hornbeam (7.18%), which comprise more than 70% of total growing stock owned by the Republic of Croatia. Compared to the state forests, in private forests tree composition is different. The common beech (28,04%) is still most common species, followed by sessile oak (15.20%), European hornbeam, (13.23%), black locust (*Robinia pseudoacacia*) (6.27%), other hard broadleaves (4.94%), and common oak (4.34%). The silver fir makes 1,01% of the total growing stock in private forests (lit 4).

In Croatia, forests have mostly developed with natural regeneration, so they belong to the first or the second generation of naturally renewed vast virgin forests in the area between the Sava and Drava Rivers. According to the composition of trees, they are natural or very similar to the virgin forests from which they originated. The conservation status of Croatian forests is very good compared to the European level. As high as 95% of forest components show a natural composition, this is rare and highly valuable in global proportions (lit 3).

The distinctive feature of Croatian forestry is the management of natural forests and the use of natural regeneration as a basic method of forest regeneration. The reason why Croatian forests have retained their natural structure lies in natural or artificial regeneration, strict adherence to the principles of natural regeneration, and the abolishment of clear-cutting as a method of forest regeneration. The forests are characterized by factors such as stability, productivity, and biodiversity, which are conducive to sustainable management and natural regeneration.

Forest statistics and land ownership (lit 1,4,5)

The Croatian land area is 5 659 400 ha. Forests lands cover 2 755 278 ha or 48,6% (of which around 2 496 928 ha is actually covered with real forest). Croatia is one of the countries with highest forest cover in Europe. There is an increasing forest cover growth (8% since 1986 or 0,24% per year) as can be seen in the table below.

Table 1: Forest growth over time. (Lit 1 and 5)

Time	Forest land with forest present
1986	2 061 509
1996	2 078 289
2006	2 402 782
2015	2 416 107
2017	2 496 928

Most of all forests belongs to naturally regenerated forests, but besides that there are coppice forests, and macchias (shrub forest). Plantations and other forest cultures take around 2,98% (lit 4). Such plantations are almost all owned and managed by the State company “Hrvatske šume d.o.o” (CF Ltd), see below.

State

76% of forests lands in Croatia are state forests (2 095 266 out of 2 755 278 ha). State company “Hrvatske šume d.o.o (CF Ltd)” manages 97% of all *state* forests, while the rest of 3% are managed by other bodies of state administration or other legal persons established by the Republic of Croatia (i.e. Faculty of Forestry, University of Zagreb). This includes 70 456 ha of plantations, that are all managed by CF Ltd. All State lands are under Forest Management Plans (FMP) or under Nature protection plans (when protected areas).

Private

Private forests comprise 24% of all forest land in Croatia, leading to 660 012 ha in 2019. They are according to Act of Forests divided in categories: (a) small, up to 20 ha; (b) medium, between 20 and 300 ha; and (c) large, more than 300 ha. Privately owned forests are still not covered completely by FMPs (still 30% of private forests (approx. 220 000 ha) is in the process of development of FMPs which is financed by State budget and it is planned to be developed before 2025). In Croatia its obligatory to have a FMP, for state and private owners. But often small owners are not capable of making one or are not interested. Therefore, it takes a long time to reach 100% coverage with private owners. All of the above include 4 429 ha of plantations, owned and managed by private owners.

Forest Management in general and organisations involved (lit 3,6,7)

Forests are resource of national interest and their management is prescribed by Act on forests (lit 6) which require that all forests are managed according to forest management plans which development and main rules are explained in Rulebook of Forest Management (lit 7). Part of the development of FMPs is also an assessment of the field situation (and HCV presence). The total forests and forest land area of Croatia is divided in Forest management units (FMU) and each should have a FMP. The FMP system in Croatia is a national enforced system. Forest Management Planning, by 2025, should cover 100% of all forest lands, state and private, protected or not. They are ‘land based’, not so much owner or type-of-protection based. FMP’s should thus be in place for all state and

private forests and also for all protection classes except for 2 classes; strict reserves and national parks, these have 'Nature Protection Plans'. See indicator 1.3 where this is explained in detail.

Since January 2016, the forest area of the Republic of Croatia is divided into 684 forestry units owned by the Republic of Croatia and 407 forestry units owned by private owners. 649 of the State units are managed by limited liability company CF Ltd. 35 state forest management units were used or managed by other state administration and legal entities founded by the Republic of Croatia. Some of these are without forest management plans because they belong to national parks and strict reserves. The following organisations are mainly responsible for forest issues:

- **The Ministry of Agriculture** performs administrative and other tasks relating to forestry, wood industry, and hunting. The [Directorate for Forests, Hunting, and Wood Industry](#) (MOA) is in charge of implementation of international agreements in the area related to forestry, forestry ecology, forest protection, including elemental disasters and anthropogenic impacts, and fire, as well as regulation of the relationship and conditions of production, transport and use of forest seed and forest seedlings, preservation of forest genetic resources and forest reproductive material. This for both State and private forest land. The MOA is also responsible for legal marking of trees in the private and state forests. The Ministry of Agriculture took over the tasks from the Croatian Agricultural and Forestry Advisory Service, who was previous in charge for working with forest owners (lit 6,8,9).
- **State Inspection.** The Act on State Inspectorate was approved on 1-4-2019 ([OG 115/18](#)). It defines the structure of a State Inspectorate, governing, the conditions for executing inspections and responsibilities and authorities with the purpose of protection of public interest. The new State Inspection took over all inspections from all Ministries, forestry as well. Still the [offices are in the Ministry](#) but they obey to [State Inspectorate](#). The State inspection is active in state and private forest (and land) owners. If the inspectors find some illegality they can issue a penalty or involve the police which is the case when they find illegal logging. Usually they control papers or procedures, also in the field but not that often. Illegal logging or stealing of wood is police business and the owner should call the police. Police or State inspection reports are not published, also not in annual summarizing reports.
- **Croatian Forests Ltd (CF-ltd) "Hrvatske šume d.o.o."**, limited liability company, is a legal successor of "Hrvatske šume", public enterprise for forest and woodland management in the Republic of Croatia, founded on the basis of the Amending Forestry Act (NN 41/90), with the beginning of function on January 1st, 1991. Today, Hrvatske šume d.o.o. is a three-layered commercial company owned by the state, with the Headquarters in Zagreb, 16 regional forest administrations (subsidiaries) and 171 regional forest offices. "Hrvatske šume d.o.o." is in charge for drafting country-wide & regional forest management plans (every 10 years) and implementing sustainable and integral management in the state forests on the whole territory of the Republic of Croatia in an environmentally sensible, economically efficient and socially responsible way. They are also responsible for the control of illegal activities in forests under their responsibility (lit 10).

Categories of forests and forest protection in Croatia (see category 3 for a detailed explanation).

All forests in Croatia are multi-functional. According to the Rulebook on Forest Management purpose (lit 6,7), the forests in Croatia are divided into the following classes:

- Commercial or productive forests – forests with predominantly economic functions.
- Protective forests – forests with the primary function of protection of water, soil, etc.
- Special purpose forests – This group is separated in 6 types of special purposes.

Forest operations and felling permits for each of the forest classes and types.

- Commercial or productive forests (lit 6,11,12) . All activities done are based on forest management plans. All national and international legislation, conventions, strategies and action plans on nature conservation are included in forest management plans. Forest owners are responsible for proposing the forest management plans, that further need to be approved by the Ministry responsible for forestry. For state forests, forest management plans are done by the Public company Hrvatske šume (except for forests managed by other public legal subjects, such as Ministry for protection). For private owners Forest Management Plans are often done by registered experts. Forest management plans are done for 10 years, and for their implementation, Operational Annual plans are developed. Part of the development of FMPs is also an assessment of the field situation (and HCV presence). All forest owners (including private) are thus obliged to register in the Forestry register, Administrated by Ministry for Agriculture. They are obliged to have a Programme for managing private forests (a Forest Management Plan) and Operational annual plans for implementation. For small and medium private forests owners (up to 300ha) all planning can be done by the Croatian Agricultural and Forestry Service, which was in 2019 joined with the Ministry of Agriculture. But this only in case such small owners declare that they need help because they do not have the expertise or funds to develop the plans. There are also funds for small and medium owners to assist them with the process in case they want to do it on their own, but do not have the funds. Even with all support in place it can happen that FMP's are still not (yet) developed with small and medium scale owners. In case such Program for managing private forest is not developed, the Ministry responsible for forestry issues a '*Decision for the removal of trees*' when this is not contradicting the regular Forest laws and regulations. Such a permits is only for a short duration, to remove the trees when agreed. But this is only a temporarily measure as long as a FMP is not yet developed. The process should be finished by 2025.

The marking and felling are prescribed by the *Ordinance on the Marking of Trees, Marking of Wood Assortments, Compensations and Forestry Order*, which was amended in 2017 (lit 13). It prescribes the way and documentation for marking the trees for felling, marking and documentation for wood assortments, and, as well as necessary documentation for transport of wood and wood assortments (*transport certificate*).

Based on the approved annual plans marking trees for harvest is possible. The marking of trees in forests and on forest land is done by a forestry contractor who possesses the corresponding license of the Forestry Chamber and based upon the Request for marking. State and big private forest owners are obliged to enter the data on trees marked for felling into an electronic *Register of records*, while for small and medium forest owners the registration is done by the Ministry of Agriculture. In all forests, only the removal of marked trees is allowed. No further permits are needed because all harvesting should be in line with the annual plans and registered in the Register of records.

There are amendments made to the *Ordinance on the Marking of Trees, Marking of Wood Assortments, Compensations and Forestry Order* from 2017 (lit 13) for the purpose of establishing traceability in accordance with the EU Timber Regulation (EUTR). This to guarantee properly labelled wood assortments (technical wood and spatial wood) for which a transport certificate is needed. Such document lists the load from the first storage location to the final processing site. When replacing on the market and transport, the owner of the wood assortments shall have copies of all accompanying documents and other relevant documentation (invoice, etc.) proving the origin of the purchased goods. With private forest owners such transport certificates are to be issued by a forestry contractor who possesses the corresponding license of the Forestry Chamber. In case of State forests these are issued by Public company Hrvatske šume.

- Protective forests (lit 1,20,23,24,25,26,29,32). In these forests forest management activities are limited and production of wood assortments is a result of silvicultural work. Management of protective forests is done by the forest owner in accordance with forest management plans. The organization and procedure of harvesting the wood and wood assortments from protective forests is the same as described in productive forests above, but extra regulations about protection are to be complied with.
- Special purpose forests (lit 3,14,15,16). This group is separated in 6 types of special purposes: protected forests (forests in protected areas), urban forests, Forest Seed Objects, forests for scientific research, forests for the defense of the Republic of Croatia and forests for the purposes specified by special regulations. For each of these types different rules are applicable. With some of the types harvesting is not allowed, in others it is, but under strict regulations. The type of 'protected forest' is further separated in 9 protection classes. See category 3 for details about management for each of the mentioned protection classes and table 2 under category 3 for a good summary.

FSC certification in Croatia

Currently there are 13 FMU certificates issued for in total 2 048 592 hectare. Of these 3 are private and 10 are from State forest and are related to their Group schema. All forests managed by the State company Hrvatske šume are certified by a FSC Multisite (Group) scheme covering 16 Regional Enterprise Offices (Certificate registration SA-FM/COC-001212). Certified product groups are round wood logs, fuelwood, twigs, and wood chips. The certificate was renewed in 2017 (lit 61,68,69). Almost all state forests managed by CF Ltd are thus FSC certified (96,6% of all state owned forests, or 2 024 026 ha). The remaining 3,4% is not certified. Those are productive forests but having additional goals (education, protection, etc.) beside production of wood. Some private owners are also certified (3 owners with 24 565 ha), often because forests were given back to their original owners recently, and such forests were certified in the State group scheme (Source: FSC website and local expert, 2019). Audit reports from the last 5 years are consulted throughout the CNRA to compare with the findings in this document.

Transparency International Corruption Perceptions Index

Croatia has a 'Transparency International Corruption Perceptions Index', of 48 (2018, where 100 is without corruption). The trend over the years is downwards, which is not good news (it was 51 in 2015). And scores 63 at the "rule of law" and 61 with the "control of corruption" indicator by the World Bank (where 100 is best, 2017).

The findings of this report have been supported by expert input.

Table 2: Used literature and local experts in the overview text

No	Type	Source of information
1	Stats	Statistical Yearbook of the Republic of Croatia 2018, Croatian Bureau of Statistics. (Statistički ljetopis Republike Hrvatske 2018, Državni zavod za statistiku Republike Hrvatsk) 2019. https://www.dzs.hr/Hrv_Eng/ljetopis/2018/sljh2018.pdf
2	CBD	Convention on Biological Diversity, (CBD) 2014 https://www.cbd.int/information/parties.shtml Convention on Biological Diversity (CBD), Country profile, 2019 https://www.cbd.int/countries/default.shtml?country=hr National website http://www.bioportal.hr/ Direct link to 5th National report https://www.cbd.int/doc/world/hr/hr-nr-05-en.pdf Direct link to National Biodiversity Strategy and action plan https://www.cbd.int/doc/world/hr/hr-nbsap-v3-en.pdf
3	Biodiv.	Biodiversity of Croatia, State Institute For Nature Protection Ministry Of Culture – Republic Of Croatia. 2006 https://www.vusz.hr/Cms_Data/Contents/VSZ/Folders/dokumenti/javanustanovazaupravljanjezasticenimprirodnimvrijednostima/arhiva/~contents/E7X2RXYGCTUYPPPN/2011-3-21-58011335-biodiversityofcroatia.pdf
4	FMP	Forest Management Plan of the Republic of Croatia valid for the period 1.1.2016-31.12.2025. (Šumskogospodarska Osnova Šumskogospodarskog područja Republike Hrvatske–vrijedi od 1.1.2016. do 31.12. 2025. godine), 2017 https://poljoprivreda.gov.hr/istaknute-teme/sume-112/sumarstvo/sumskogospodarska-osnova-2016-2025/250
5	FAO	Global forest resources assessment 2015 country report Croatia. FAO. 2015. http://www.fao.org/3/a-az193e.pdf
6	Law	Act on forests, Official Gazette 68/2018, 115/18 (Zakon o šumama, 2018, NN 68/2018, 115/18) 2018 https://narodne-novine.nn.hr/clanci/sluzbeni/2018_07_68_1392.html
7	Guide	Rulebook of forest management. Pravilnik o uređivanju šuma, NN 79/2015, 91/2018 https://narodne-novine.nn.hr/clanci/sluzbeni/2018_11_97_1875.html https://narodne-novine.nn.hr/clanci/sluzbeni/2015_07_79_1532.html 2018
8	Web	Official website of the Ministry of Agriculture https://poljoprivreda.gov.hr/o-ministarstvu/9_2019 <i>Annual reports</i> https://poljoprivreda.gov.hr/istaknute-teme/poljoprivreda-173/poljoprivredna-politika/agroekonomske-analize/zeleno-izvjesce/189

9	Web	Official website of the Ministry of Agriculture https://poljoprivreda.gov.hr/o-ministarstvu/9 2019 Annual reports https://poljoprivreda.gov.hr/istaknute-teme/poljoprivreda-173/poljoprivredna-politika/agroekonomske-analize/zeleno-izvjesce/189
10	Web	Official website of Hrvatske šume https://www.hrsume.hr 2019 Annual reports: https://www.hrsume.hr/index.php/en/annual-statements
11	Stats	Registry of private forest owners (Upisnik privatnih šumoposjednika) https://sumoposjednik.mps.hr/ 2019
12	Law	Ordinance on registration of forest owners, Official Gazette NN137/2014 (Pravilnik o upisniku šumoposjednika, 2014, NN 137/2014) https://narodne-novine.nn.hr/clanci/sluzbeni/2014_11_137_2605.html 2014
13	Law	Ordinance on the Marking of Trees, Marking of Wood Assortments, Compensations and Forestry Order, Official Gazette 17/2015, 57/2015 (Pravilnik o doznaci stabala, obilježavanju drvnih sortimenata, popratnici i šumskom redu NN 17/2015, 57/2015) https://narodne-novine.nn.hr/clanci/sluzbeni/2015_02_17_332.html https://narodne-novine.nn.hr/clanci/sluzbeni/2017_06_57_1270.html 2017
14	Law	Law on Environmental protection , 2013, Official Gazette 80/2013 (Zakon o zaštiti prirode, 2013, NN 80/2013) – amendments lit 20, 21 https://narodne-novine.nn.hr/clanci/sluzbeni/2013_06_80_1658.html 2013
15	Law	Law on Amendments to the Law on Environmental protection , 2018 Official Gazette 15/2018 (Zakon o izmjenama I promjenama Zakona o zaštiti prirode, 2018, NN 15/2018) https://narodne-novine.nn.hr/clanci/sluzbeni/2018_02_15_316.html 2018
16	Law	Law on Amendments to the Law on Environmental protection , 2019, Official Gazette 14/2019 (Zakon o izmjenama Zakona o zaštiti prirode, 2019, NN 14/2019) https://narodne-novine.nn.hr/clanci/sluzbeni/2019_02_14_276.html 2019
17	Expert	Local Expert working on cat 1: Mr Stjepan Posavec, associate Professor at the Faculty of Forestry University of Zagreb.

Sources of legal timber in Republic of Croatia

Forest classification type	Permit/license type	Main license requirements	Clarification
State and municipal forests	Harvesting permit	Issued by Directorate for Forests, Hunting, and Wood Industry (MOA) on the basis of Forest Management Plans, harvesting and silvicultural plans.	A harvesting permit is always needed when harvesting trees.
Private forest	Harvesting permit	Issued by Directorate for Forests, Hunting, and Wood Industry (MOA) on the basis of harvesting and silvicultural plans. If these are not available a special permits is required.	A harvesting permit is always needed when harvesting trees. In case private owners do not have a Forest Management Plan they can request a 'decision for the removal of trees'

Risk assessment

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
Legal rights to harvest			
<p>1.1 Land tenure and management rights</p>	<p>Applicable laws and regulations</p> <p>Forest law 2019 Zakon o šumama (OG 140/05, 82/06, 129/08, 80/10, 124/10, 25/12, 68/12, 148/13, 94/14, 68/18, 14/19) https://narodne-novine.nn.hr/clanci/sluzbeni/2018_07_68_139_2.html</p> <p>Law on environmental protection 2018 Zakon o zaštiti prirode (OG 80/13, OG 15/18, 14/19) https://www.zakon.hr/z/403/Zakon-o-za%C5%A1titi-prirode</p> <p>National forest policy and strategy 2003 Nacionalna šumarska politika i strategija https://narodne-novine.nn.hr/clanci/sluzbeni/2003_07_120_16_63.html</p> <p>Law on land registry 2019 Zakon o zemljišnim knjigama https://www.zakon.hr/z/103/Zakon-o-zemlji%C5%A1nim-knjigama</p> <p>Law on state measurement and cadastre 2018 Zakon o državnoj izmjeru i katastru https://www.zakon.hr/z/156/Zakon-o-dr%C5%BEavnoj-izmjeri-i-katastru-nekretnina</p>	<p>State company, HRVATSKE ŠUME 2019- http://portal.hrsume.hr/</p> <p>Hrvatske šume, GIS platform Public information of forests – 2019 http://javni-podaci.hrsume.hr/</p> <p>FSC, standards and certificate 2019 http://portal.hrsume.hr/index.php/hr/ume/certsuma</p> <p>HŠ consult d.o.o. –, consultancy company for FSC FM certification 2019 http://portal.hrsume.hr/index.php/hr/h-consult-doo</p> <p>Croatian Chamber of forestry and wood industry engineers, 2015 http://www.hkisdt.hr/podaci/2015/Licenciranje/pravilnik_licenciranje_2015.pdf</p>	<p>Overview of Legal Requirements</p> <p>The main laws which have direct influence in land tenure and management are the Forest law (2019) and the Law on environmental protection (2018). The first National forest policy and strategy was adopted in 2003.</p> <p>The Forest law for the first time defined obligations of private forest owners related to the forest management. All landowners are registered and such is explained in the Law on land registry.</p> <p><u>Land management rights</u></p> <p>In the actual management of forests, a state owned company named Croatian Forest Ltd. (in Croatian, Hrvatske šume d.o.o.), has a key role. This company manages 75% of the land categorized as forest land. The company is obligated by the law to make detailed Forest Management Plans (FMP) and to keep a precise book keeping of growing stock for every Forest Management Unit (FMU).</p> <p>The Ministry of Agriculture is the supervisory body that provides approval for forest management plans regardless of the forest ownership (Law on state administration duties). Land management rights are defined with Forest law and the Law on environmental protection. These regulations are explaining topics like land-use change options, registration of lands, development and use of FMP's, responsible governmental organisations, the way to request permits and special environmental protection requirements and when these are applicable etc.</p> <p>In some cases, private forest owners buy forest land from other forest owners to expand or consolidate their property. All such things are organized by the Law on land registry and Law on state measurements</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Civil obligations act 2005 Zakon o obaveznim odnosima (OG 35/2005) https://wipolex.wipo.int/en/legislation/details/13172</p> <p>Law on compensation of property confiscated in the time of Yugoslav communist rule 1996 Zakon o naknadi za imovinu oduzetu za vrijeme jugoslavenske komunističke vladavine (OG 81/02) https://www.zakon.hr/z/130/Zakon-o-naknadi-za-imovinu-oduzetu-za-vrijeme-jugoslavenske-komunisti%C4%8Dke-vladavine</p> <p>Act on state inspectorate 2019 zakon-o-inspektoratu (OG 115/18). http://www.ilo.org/dyn/natlex/docs/WEBTEXT/59725/65229/E99HRV01.htm</p> <p>Legal Authority Ministry of Agriculture, https://poljoprivreda.gov.hr/</p> <p>Croatian Forests Ltd. (https://www.hrsume.hr/index.php/en/)</p> <p>Ministry of Environment and Energy https://www.mzoip.hr/en/</p> <p>Legally required documents or records Registration of ownership in the land register</p>	<p>FAO, global forest resources assessment (FRA) report for Croatia, 2010 http://www.fao.org/3/al485E/al485e.pdf</p> <p>FAO FRA report 2015 http://www.fao.org/3/a-i4808e.pdf</p> <p>Global Forest Watch, Country profile 2019 http://www.globalforestwatch.org</p> <p>Chatham House Illegal Logging Indicators Country Report Card, 2019 https://www.illegal-logging.info/regions/Croatia</p> <p>Property rights alliance, International property rights index 2019 https://www.internationalpropertyrightsindex.org/country/croatia</p>	<p>and land cadaster. More governmental obligations are explained in the Civil obligations act.</p> <p>There is also a special law that regulates the return of properties to the former owners that lost their lands during the civil war because they were confiscated. Such is arranged in the Law on compensation of property confiscated in the time of Yugoslav communist rule.</p> <p><u>Land tenure</u> Private forest owners can trade with their forest without restriction in order to enlarge and/or consolidate their property. In Croatia it is possible to buy and sell land and acquire ownership, like in other EU countries. The pre-emption right (first right of buy) exists only in case when private forest is located in a national park according to the Law on environmental Protection. In that case private forest owner must offer the property first to the state.</p> <p>Forests are mostly (76%) state-owned and the remaining 24% are privately owned. State forests are managed by state owned forest company 'Hrvatske šume d.o.o. Municipality forests are managed by the municipalities and private forests by its private owners. Planning for all ownership types is done by government. According to the estimations made by experts there are 600 000 private forest owners (source: Forest Land Ownership Change in Croatia 2015). Private forest estates are small, with an average area of only 1,1 ha (total hectares of private forest owners is 660 012 ha/ 600 000 owners = 1,1 ha) and even these are further fragmented into several separate plots.</p> <p><u>Forest Management actors</u></p> <ul style="list-style-type: none"> State forests are managed since 1991 as a state owned forest company Hrvatske šume Ltd. Hrvatske šume manages 97% of all state forests, while the rest of 3% are managed by other bodies of

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>https://oss.uredjenazemlja.hr/public/index.jsp</p> <p>Other governmental documents Forest Management Plan of the Republic of Croatia valid for the period 1.1.2016-31.12.2025. 2017 Šumskogospodarska Osnova Šumskogospodarskog područja Republike Hrvatske–vrijedi od 1.1.2016. do 31.12. 2025. godine https://poljoprivreda.gov.hr/istaknute teme/sume-112/sumarstvo/sumskogospodarska-osnova-2016-2025/250</p> <p>EFI, Forest Land Ownership Change in Croatia (table 1A) 2015 https://www.researchgate.net/publication/277282378_Forest_Land_Ownership_Change_in_Croatia_COST_action_FP1201_-_FACESMAP_Country_Report</p>	<p>Stjepan Posavec, current status and trends in private forests of Croatia. 2005. http://www.coford.ie/medi a/coford/content/publicatio ns/projectreports/small-scaleforestryconference/P osavec.pdf</p> <p>Croatian Forest Research Institute, forests and forestry in Croatia 2015. http://www.sumins.hr/wp-content/uploads/2016/11/Bro%C5%A1ura_FACES_MAP_Forests-in-Croatia.pdf</p> <p>ELRA, Land registration system of the republic of Croatia. 2019 https://www.elra.eu/land-registration-system-of-the-republic-of-croatia/</p> <p>Krajter Ostoić et al., Exploring global scientific discourses on urban forestry. 2015</p>	<p>state administration or other legal persons established by the Republic of Croatia (i.e. Faculty of Forestry, University of Zagreb).</p> <ul style="list-style-type: none"> The task of the Directorate for Forests, Hunting, and Wood Industry (MOA), at the Ministry of Agriculture, is to draw up legislation in the field of forestry, monitor the forest management and professionally co-operate with it in relation to the preparation of programmes at state level. There is close co-operation between the Ministry of Agriculture, and the Ministry of Environment and Energy regarding issues such as the health condition of forests, protection of rare ecosystems and species, as well as the establishment and management of protected areas. State Inspection. The Act on state inspectorate was approved 1-4-2019 (OG 115/18). It defines the structure of a State Inspectorate, governing, the conditions for executing inspections and responsibilities and authorities with the purpose of protection of public interest. The new State Inspection took over all inspections from all Ministries, forestry as well. The State Inspection is active in state and private forest (and land) owners. If the inspectors find some illegality they can issue a penalty or involve the police which is the case when they find illegal logging. Research work is performed by the Faculty of Forestry University of Zagreb and Croatian Forest Research Institute Jastrebarsko and they cooperate in applied research with practice. Natura 2000 sites and natural heritage sites are administrated by the Ministry of Environment and Energy. <p>Harvesting can be done only by forest owner, their close family or in other cases by a registered operator. Help between neighbours is allowed and is common and traditional, but only if it is done free of charge.</p> <p>Each forest owner is responsible for showing the borders of his property to the government. In cases of unclear borders, harvesting is not allowed in</p>

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		<p>https://www.researchgate.net/publication/280232674_Exploring_global_scientific_discourses_on_urban_forestry</p> <p>FACESMAP Country Report, Forest Land Ownership Change in Croatia. COST action FP1201. 2015</p> <p>https://www.researchgate.net/publication/277282378_Forest_Land_Ownership_Change_in_Croatia_COST_action_FP1201_-_FACESMAP_Country_Report</p> <p>Local expert, 2019</p>	<p>the area of dispute. On paper (and maps) this is done in the database of the cadaster. In the field markings should be visible as well (Law on state measurement and cadaster).</p> <p>Customary rights There are no special laws about different groups of people in relation to forests and customary rights. This because all people are equal in Croatia. The Forest act is the only applicable law and it allows all people free access to the state forest, for recreational purposes (Forest act, article 21). It is also permitted to non-owners to collect non wood forest products for trade purposes. License is issued by the local forest authority. See down below indicator 1.13 for more details.</p> <p>Description of Risk</p> <ol style="list-style-type: none"> Land returning. The process of returning the land to private owners is still taking place. Such is explained in the Law on compensation of property confiscated in the time of Yugoslav communist rule. State company Hrvatske šume Ltd could lose some more forest management areas in the future (source: local expert). However, restitution is progressing slowly and it means that some lands have disputes. Information or data about this is not published. So far there is no publicly available information on how much forest area still needs to be returned to previous owners. According to experts, opinion so far about 30 000 ha of forest has been returned to previous owners. (Source: Krajter Ostoić et al., 2015, Forest Land Ownership Change in Croatia. COST action FP1201 - FACESMAP Country Report). Private forest owners have the right to submit their request for returning forest land to the State Attorney's Office with documents proving their ownership rights (Civil obligations act). The problem with reclaiming forest land to previous owner(s) may occur in case when private forest

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			<p>owners cannot prove their ownership rights or if they received insignificant compensation for their property in Yugoslavia. In the last decade several policies influenced private forests and private forest owners. Ownership is clearly established and publicly accessible in Registration of ownership and land register for registered users.</p> <p>2. Management rights. Management rights for State Forests are limited by forest management plans done by the State company Hrvatske šume Ltd. Hrvatske šume also makes the FMP's for other governmental forest owners (only 3% of the total forest in not managed by Hrvatske šume). Management plans are allowing the regular cut to be only at a maximum of 50-70 % of the increment (Source: Forest Management Plan of the Republic of Croatia valid for the period 1.1.2016-31.12.2025). For private owners Forest Management Plans are often done by registered experts. In general management rights are clear, except for lands that have disputes over ownership (see point 1 above), no clear owner or owners that have since long abandoned their land. In the last 2 cases State forest can take 'temporarily' control of such lands when needed. It means they will manage it as state lands. It will be added to an FMP (or a new FMP will be made) and regular management (or protection) takes place.</p> <p>What other sources say. International sources like FAO (Global forest resources assessment report (FRA), Chatham house, Global Forest Watch and FSC FMU assessment reports for certificates in Croatia do not list any problems with regards to this indicator. The International property rights index does indicate lower than EU average figures for issues related to land tenure and land management (where low indicator values means not positive). In 2019 Croatia is listed at place 75 out of 131 countries. In this score a low number is best. But</p>

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			<p>figures are improving every year after joining the EU and recovering from the civil war.</p> <p>Local sources like the Croatian Chamber of Forestry and Wood Industry engineers and HŠ consult d.o.o. do not mention anything either. The consulted local expert is not aware of any issues with this indicator either.</p> <p>Risk Conclusion All together the risks with regards to this indicator are low.</p> <p>Low risk threshold (1) is met: Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the authorities and/or by the relevant entities.</p>
1.2 Concession licenses	<p>Applicable laws and regulations Law on concessions 2017 Zakon o koncesijama (NN 69/17) https://www.zakon.hr/z/157/Zakon-o-koncesijama</p> <p>Law on establishing state forest company 2018 Zakon o prestanku važenja Zakona o Hrvatskoj poljoprivredno (NN 111/18) https://www.zakon.hr/z/1627/Zakon-o-prestanku-va%C5%BEenja-Zakona-o-Hrvatskoj-poljoprivredno-%C5%A1umarskoj-savjetodavnoj-slu%C5%BEbi</p> <p>Forest law 2019 Zakon o šumama (OG 140/05, 82/06, 129/08, 80/10, 124/10, 25/12, 68/12, 148/13, 94/14, 68/18, 14/19)</p>	<p>State company, Hrvatske šume 2019 http://portal.hrsume.hr/</p> <p>Hrvatske šume, GIS portal Public information of forests – 2019 http://javni-podaci.hrsume.hr/</p> <p>Property rights alliance, International property rights index 2019 https://www.internationalpropertyrightsindex.org/country/croatia</p>	<p>Overview of Legal Requirements According to the Law on concession (OG 69/17), a forest concession is not allowed on forest and forest land in state ownership (Article 8).</p> <p>All State forest are now managed by the state owned company “ Hrvatske šume d.o.o.” (established by the Law on establishing state forest company). Forest concessions cannot be issued nor are there any remaining and active.</p> <p><i>Other types of concessions</i> A concession for hunting areas in state forests is valid for ten years. Such is stated in the Law on hunting.</p> <p>According to the Forest law (OG 140/2005) state forests may be excluded from the forest management only if it is in the interest of the state, e.g. for the purpose of building of public infrastructure (roads, energy plants, water provision facilities) (Article 51).</p>

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	<p>novine.nn.hr/clanci/sluzbeni/2018_07_68_1392.html</p> <p>Law on environmental protection 2018 Zakon o zaštiti prirode (1994, 2007, OG 78/2015, 12/18). https://www.zakon.hr/z/403/Zakon-o-za%C5%A1titi-prirode</p> <p>Including the 'Regulation on the strategic assessment of the impact of the plans and programs on the environment'.</p> <p>Environmental law 2013 Zakon o zaštiti okoliša (OG 80/13 , 153/13 , 78/15 , 12/18 , 118/18). https://www.zakon.hr/z/194/Zakon-o-za%C5%A1titi-okoli%C5%A1a</p> <p>Including:</p> <p>Regulation on strategic environmental assessment of strategies, plans and programmes on the environment 2017 Uredbu o strateškoj procjeni utjecaja strategije, plana i programa na okoliš (3/17). http://www.propisi.hr/print.php?id=8162.</p> <p>Regulation on information and participation of the public and public concerned in environmental matters 2008 Uredbu o informiranju i sudjelovanju javnosti i</p>	<p>Chatham House, Illegal Logging Indicators Country Report Card, 2019 https://www.illegal-logging.info/regions/Croatia</p> <p>FAO, global forest resources assessment report (FRA) for Croatia, 2010 http://www.fao.org/3/al485E/al485e.pdf</p> <p>FAO, FRA report 2015 http://www.fao.org/3/a-i4808e.pdf</p> <p>State company, Hrvatske šume 2019 http://portal.hrsume.hr/</p> <p>Hrvatske šume. GIS platform Public information of forests - 2019 http://javni-podaci.hrsume.hr/</p> <p>HAOP, Protected areas in Croatia 2019</p>	<p>The Regulation of the ecological network arranges all things related to the Natura2000 network. In some cases, it means that special Natura 2000 site management plans are made. But only a few exists. Such plans could include harvesting activities, depending on which class of protection a certain site has. Croatia is still in the implementation stage with these Natura 2000 management plans, as can be expected because it is a lot of work to develop the system and implement it.</p> <p>There are 9 different classes possible. This differs per location. See Overview of category 3, table 2 for the complete overview and details about all classes.</p> <p>Identified legislation is clearly defining management and harvesting planning and the process of issuing harvesting permits.</p> <p>Forest Management Planning</p> <p>The Forest law regulates the activities in the forestry sector in Croatia. The forest management plans determine conditions for harmonious usage of forests and forest land and procedures in that area, necessary scope regarding the cultivation and forest protection, possible utilization degree and conditions for wildlife management.</p> <p>The FMP system in Croatia is a national enforced system. Forest Management Planning, by 2025, should cover 100% of all forest lands, state and private, protected or not. They are 'land based', not so much owner or type-of-protection based. FMP's should thus be in place for all state and private forests and also for all protection classes except for 2 classes; strict reserves and national parks, these have 'Nature Protection Plans'.</p> <p>The forest management plans and documents are as follows:</p>

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	<p>zainteresirane javnosti u pitanjima zaštite okoliša (64/08).</p> <p>Ordinance on forest management 2018 Pravilnik o uređivanju šuma (OG 97/2018) https://narodne-novine.nn.hr/clanci/sluzbeni/2018_11_97_187_5.html</p> <p>Law on hunting 2018 Zakon o lovstvu (OG 99/18) https://www.zakon.hr/z/422/Zakon-o-lovstvu</p> <p>The Regulation of the ecological network 2015 Uredba o ekološkoj mreži (OG 124/13 and 105/15) https://narodne-novine.nn.hr/clanci/sluzbeni/2013_10_124_26_64.html</p> <p>Legal Authority Ministry of Agriculture, (https://poljoprivreda.gov.hr/)</p> <p>Inspectorate of the Republic of Croatia State inspectorate</p> <p>Ministry of Environment and Energy https://www.mzoeip.hr/en/</p> <p>Legally required documents or records</p>	<p>http://www.haop.hr/hr/tematska-podrucja/zasticena-podrucja/zasticena-podrucja/zasticena-podrucja-u-rh</p> <p>UNECE, report 2004 http://www.unece.org/fileadmin/DAM/timber/docs/seam/2004-1/full_reports/Croatia.pdf</p> <p>Matic, S. in Dijaci, J.(eds.) The Forests of Croatia, Country Report, 1999 http://www.natura2000.gov.si/uploads/tx_library/Diaci_Virgin_forests_and_forest_reserves_Cost_E4.pdf</p> <p>FSC, website 2019 https://info.fsc.org/certificate.php</p> <p>CURIA, European court cases Croatia, 2019</p> <p>Local expert 2019.</p>	<p>Country level:</p> <ul style="list-style-type: none"> • General Forest Management Plan for the Republic of Croatia (General FMAP) (country wide plan) <p>Unit level- 5 years:</p> <ul style="list-style-type: none"> • Forest Management Plan for normal management units managed by state (unit level, see below) • Programmes for management of management units on karst. Karst is a landscape formed by soluble rocks such as limestone, dolomite, and gypsum. It is typically very rocky. • Programmes for management of private forests. Not much different as State plans. • Programmes for forest renewal and protection in specially endangered areas. This has special limitations because of biodiversity protection. • Programmes for management of forest with special purpose. These can include additional limitations depending which of the 6 types of special purpose (and the 9 classes of protection) it is. See category 3, table 2 for more info. <p>Unit level -annual plans:</p> <ul style="list-style-type: none"> • Operational annual plans <p>Forests is a resource of national interest and their management is prescribed by the Forest law which require that <u>all</u> forests are managed according to Forest management plans (FMP). Part of the development of FMP's is also an assessment of the field situation (and HCV presence). The total forests and forest land area of Croatia is divided in Forest management units (FMU) and each should have a FMP. Since January 2016, the forest area of the Republic of Croatia is divided into 684 forestry units owned by the Republic of Croatia and 407 forestry units owned by private owners. 649 of the State units are managed by</p>

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	<p>Forest Silvicultural management plans and forest Management Units Plans are publicly available only at the office of Croatian Forests Ltd.</p> <p>Forest management plans include Natura 2000 sites in forests. Natura 2000 plans and FM plans are identical.</p> <p>Annual reports Business report on Croatian forests 2019 https://www.hrsume.hr/index.php/en/annual-statements</p> <p>Official website of the Ministry of Agriculture https://poljoprivreda.gov.hr/o-ministarstvu/92019 <i>Annual reports:</i> https://poljoprivreda.gov.hr/istaknute-teme/poljoprivreda-173/poljoprivredna-politika/agroekonomske-analize/zeleno-izvjesce/189</p> <p>Official website of Hrvatske šume https://www.hrsume.hr 2019 <i>Annual reports:</i> https://www.hrsume.hr/index.php/en/annual-statements</p>		<p>State company "Hrvatske šume d.o.o. 35 state forest management units are used or managed by other state administration and legal entities founded by the Republic of Croatia. Some of these are without forest management plans because they belong to national parks and strict reserves. According to the General FMAP 2016 - 2025, 625 management units had a valid forest management plan (96%) out of the 649 management units of state forests. 24 management units did not have prepared plan. Forest management plans were not made for 23 units in karst region and one management unit close to the border with Bosnia and Herzegovina due to unresolved territorial issues. These areas cannot be used for anything for the moment. Currently, more than 70% of - privately owned forests have valid management plans. All forest management plans and programs developed for management of each forest management unit should be in line with the General FMAP.</p> <p>Forest Management Plan for management units are developed on 10 years cycles and according to the Law on forests each year 10% of the total forest area is in process of renewal of the plan. This process presents the forest inventory conducted on the stand level that has been implemented in Croatia for many decades. The Ministry of Agriculture supervises the decision-making process of management plans as well as their renewal and revision. The General FMAP, among others, appoints activities which will be performed in the forests for the next 10 years but also, to some extent, describes the former management (management in the previous 10-year period) and the status of forests at the beginning of the new 10-year period. So far, four General FMAPs have been prepared: General FMAP encompassing the period from 1986-1995, 1996-2005, 2006-2015, 2016-2025. Based on the forest management type, according to the Ordinance on Forest Management forest stands are managed either as even-aged or uneven-aged forests.</p>

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	<p>Official website of the Ministry for Environmental Protection and Energy (MEPE) 2019 https://www.mzoip.hr/hr/priroda.html 2019 <i>Annual reports:</i> https://mzoe.gov.hr/pristup-informacijama/strategije-planovi-i-ostali-dokumenti/godisnje-izvjesce-o-radu-ministarstva/1072</p> <p>Croatian Agency for Environment and Nature 2019 http://envi-metapodaci.azo.hr/geonetwork/srv/hrv/catalog.search#/metadata/5f8947fc-67f7-446d-9dea-c83dae24fa89 <i>Annual reports:</i> http://www.haop.hr/hr/godisnja-izvjesca-o-pracenju-emisija-oneciscujucih-tvari-u-zrak-iz-nepokretnih-izvora-na-teritoriju</p> <p>Other governmental documents Forest management plan of the republic of Croatia (FMAP) valid for the period 1.1.2016-31.12.2025. 2017 Šumskogospodarska Osnova Šumskogospodarskog područja Republike Hrvatske–vrijedi od 1.1.2016. do 31.12. 2025. Godine. https://poljoprivreda.gov.hr/istaknute teme/sume-</p>		<p><i>State</i> 76% of forests lands in Croatia are state forests (2 095 266 out of 2 755 278 ha). State company “Hrvatske šume d.o.o (CF ltd)” manage 97% of all state forests, while the rest of 3% are managed by other bodies of state administration or other legal persons established by the Republic of Croatia (i.e. Faculty of Forestry, University of Zagreb). This includes 70 456 ha of plantations, that are all managed by CF ltd. As stated above almost all state lands are under Forest Management Plans or under Nature protection plans (when protected areas).</p> <p><i>Private</i> Private forests comprise 24% of all forest land in Croatia, leading to 660 012 ha in 2019. They are according to Act of Forests divided in categories: (a) small, up to 20 ha; (b) medium, between 20 and 300 ha; and (c) large, more than 300 ha. Privately owned forests are still not covered completely by FMPs (still 30% of private forests (circa 220 000 ha) are in the process of development of FMPs which is financed by State budget (when requested by private owners) and it is planned to be finished before 2025). All of the above include 4 429 ha of plantations, owned and managed by private owners.</p> <p>Forest management plans are publicly accessible at the local forest offices and the state company.</p> <p>Ecological network / Natura2000 management By the Regulation on the ecological network the ecological network of the Republic of Croatia was established which is at the same time considered as Natura 2000 areas. Some forest units (in management plans) are part of Ecological network of Republic of Croatia (now Natura 2000). In addition to preparation of vegetation (habitat) map, for those forest units are in the forest management</p>

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	<p>112/sumarstvo/sumskogospodarska-osnova-2016-2025/250</p> <p>Statistical yearbook of the Republic of Croatia, Croatian Bureau of Statistics 2018 Statistički ljetopis Republike Hrvatske 2018, Državni zavod za statistiku Republike Hrvatsk. https://www.dzs.hr/Hrv_Eng/ljetopis/2018/sljh2018.pdf</p>		<p>plans incorporated measures for protection of ecological network (Natura 2000). In respect of Forest biodiversity in Croatian legislation of the forestry sector, but also in the management of forest resources, biodiversity is of great importance. The ecological network of the Republic of Croatia comprises about 36% of the land territory and 15% of the coastal sea. In the Forest law biodiversity is highlighted in Article 3 which defines sustainable forest management. In addition, the Law on environmental Protection, in its Article 4, highlights the goals and tasks of nature conservation, as well as preserving and/or restoring biodiversity by preserving natural habitat types, wild species and their habitats (including all types of birds naturally occurring on Croatian territory, as well as bird eggs and nests), by establishing an appropriate protection, management and control system.</p> <p><i>Strategic Environmental Impact Assessment in Natura 2000 sites.</i></p> <p>The Ministry of Agriculture has implemented a procedure for Strategic Environmental Impact Assessments in the Forest management plan for the Republic of Croatia for the period 2016-2025 (General FMAP). Such is needed in Natura 2000 sites.</p> <p>The primary legal framework is set in the Environmental law (Official Gazette, No. 80/13, 153/13 and 78/15), article 66. Further details are arranged in the Regulation on strategic environmental assessment of strategies, plans and programmes on the environment (Official Gazette, No. 3/17) and additional detailed requirements and procedures are laid down in the the Regulation on information and participation of the public and public concerned in environmental matters (Official Gazette, No. 64/08).</p> <p>According to the various laws above, when based in a Natura2000 site, a forest owner should:</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
			<ul style="list-style-type: none"> • conduct forest management in accordance with the certification procedure • during the final felling leave small areas uncleared • preserve open sites and forest edges • ensure the extension of the cutting age of autochthonous species • avoid use of chemical pesticides • not afforested with alien species • during harvest leave the required number of old and rotten trees • make afforestation with autochthonous species <p>Management of forests in national parks Harvesting of trees in national parks is forbidden. In other protected areas it can be allowed with special regulations and with specific permissions from Ministry of Environment Protection and Energy only. See category 3 for more info about the 9 classes of protection and what is allowed, or not.</p> <p>According to the Law on environmental protection(NN 80/13), in protected areas it is forbidden to pick, collect, destroy, cut or uproot wild growing strictly protected plants and fungi. Harvesting, when permitted, can be done only by licensed forester, or a registered operator. Harvesting is always done based on Forest Management Plans and Operational annual plans, except in some cases when small owners do not yet have such plans (nevertheless it is obligatory also for small owners to have plans). As a temporarily measure they could request a special permit (Decision for the removal of trees).</p> <p>Harvesting (see indicator 1.4 for more details) Licenced engineers are marking trees for final felling and for silvicultural purposes and supervising and allowing all activities in the forests. All harvesting operations must be done based on harvesting permit. The allowed wood to be harvested is based on measuring and marking each</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
			<p>tree, then prescribed in quantity, tree species and number of trees in the harvesting permit issued by a licenced forester. Finished forest operations are checked and recorded by State company “Hrvatske šume d.o.o (state lands) and the Ministry of Agriculture (for private lands). As part of the implementation of EUTR 995/2010 forest operator has the obligation to keep records of his wood cut and trade.</p> <p>FSC certification in Croatia Currently there are 13 FMU certificates issued for in total 2 048 592 hectares. Of these 3 are private and 10 are from State forest and are related to their Group schema (see overview text for more information).</p> <p>State inspection and law enforcement The State Inspection service also includes the forestry and hunting inspection and is in charge with law enforcement on forests and forest land owned by the state and private. There are state inspectors and regional inspectors. The inspection service can also request the help of the Forestry Chamber to judge the technical quality of the work carried out in the field. Inspections are taking place throughout the country.</p> <p>There are no publically available reports by the government about illegal harvesting, court cases or State inspection reports in the forestry sector. Such is also not reported in the annual reports the of Ministry of Agriculture, Hrvatske šume ltd, the Croatian Agricultural and Forestry Advisory Service, the Ministry for Environmental Protection and Energy or the Croatian Agency for Environment and Nature.</p> <p>It can be found that the Forest inspection in year 2017, for example, made 2 317 surveillances, but no further content or conclusions are reported.</p> <p>Growing stock assessment</p>

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			<p>Over the years the forest area shows and increase of 8% since 1986 or 0,24% per year (annual reports, see left column). And although that doesn't say much about the quality of that forest the lack of absence of any media news or data in international reports are further guarantees that things are under control. An alternative way to look at it is to look at the increase (or decrease) of the growing stock. When the growing stock is decreasing this is a signal that forests are overharvested with this will decrease the 'nature' values and thus biodiversity levels. When the growing stock is increasing it means forests are getting older, there is less disturbance and species and habitats have more time to recover from management. Overall this is will increase biodiversity.</p> <p>Growing stock assessment (Sources: FMAP and Annual reports of the various governmental organisations, Statistical yearbook of the republic of Croatia 2018, The forests of Croatia – country report).</p> <p>The total growing stock in the forests of Croatia is 418 618 277 m3, based on management plans and estimated growing stock for the forest areas without management plans. With a total forest area of 2 496 928 ha this leads to 167 m3/ha. This means a very healthy forest in Europe.</p> <p>In the period 2006 to 2016 growing stock increased by 5 % (20 658 m3). 80% of the growing stock is in the state forests, while 20% is in private forests. The annual increment is 10 146 149 m3, or 5,87 m3/ha. In the past ten years, a total allowable cut was realized on the surface of 783 4048 ha or 60% of the managed area and the cut was 56 160 375 m3 or 86% of the allowable cut. The realized cut in private forests for the same period was 2 392 543 m3 (34% of allowable cut). This means that the stock will keep on growing when the Annual Allowable Cut is not actually harvested. That is also good news for species as forests in general become older, taller, more natural and left undisturbed for a longer period of time.</p> <p>Description of Risk</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
			<ol style="list-style-type: none"> 1. Due to the natural disturbances (ice break, wind break) some of the forest management plans should be changed and updated with new conditions in the field. Due to the more frequent extremes in weather such cases will increase and the countries management systems might need become more flexible to adjust on the spot when required (source: Local expert). 2. Private forest owners are usually not actively involved in forest management planning processes due to the lack of professional knowledge and personal interests. They should be included in Forest advisory service register (which is not the case right now, only experts are listed) to gain some benefits from their forests and apply for the funds available for improvement of the quality of their forests. Funds are available for developing FMP's, measurement work etc. Nevertheless, the quality of FMP's is not at stake and is up to a good level (source: Local expert). 3. About 30% of the private forest owners do not yet have an FMP, although Croatia aims to develop the remaining 30% within a few years and before 2025 (Source: FMAP, general FMP). FMP's are mandatory, also for private owners. Croatia aims for 100% FMP cover of all forest lands. For the moment, in principle, there is thus a chance that, on these 30%, things can go wrong. Because when harvesting will take place it will not be based on planning. However, this is solved by the government by the system of 'Decisions for the removal of trees'. Private owners can request a harvesting permit and the ministry assesses the regular Forest laws and regulations and send a registered expert to assess the situation in the field. This system is in place and working and thus the 'management' part seems to be in order (Source: Local expert). For more information about harvesting permits see indicator 1.4 below.

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
			<p>What other sources say. International sources like FAO (global forest resources assessment 2015), Chatham House (Illegal Logging Portal), Global Forest Watch and Forest Europe are not reporting anything either. One older report by the UNECE (Republic of Croatia illegal logging and trade of illegally-derived forest products 2004), does not report anything significant and is too old anyway. There are no other official international reports or international messages about substantial illegal harvesting inside Croatia. The country is not associated with or designated as source of conflict timber according to latest available research.</p> <p>The country is on track with the implementation of Natura 2000, otherwise there would be a court cases between Croatia and the EU (there is no listing about this in CURIA).</p> <p>Risk Conclusion Almost all state forests in Croatia have an FSC certificate which states that forests are managed according to strict ecological, social and economic standards which include conservation and enhancement of biodiversity. Regular renewal of FSC certificate is also a confirmation that all the required standards have been met in the previous period. 30% of the private forest owners do not have an FMP. But this will be solved in the next few years. In the meantime, the system of 'Decisions for the removal of trees' will fill the gap and that system itself seems to be robust enough.</p> <p>The total amount of forest in Croatia, and the growing stock (in m3), is growing every year, over the last decades. There is no large scale deforestation taking place as this would be observed in mapping and forest management planning and reduced stocks/ha. This confirms that the forests stay as they are and law enforcement is in place.</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
			<p>International sources like FAO (Global forest resources assessment report (FRA)), Chatham house and Global Forest Watch do not list any problems with regards to this indicator. The consulted local expert is not aware of any issues with this indicator either.</p> <p>All together the risk with regards to this indicator are low.</p> <p>Low risk threshold (1) is met: Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the authorities and/or by the relevant entities.</p>
1.4 Harvesting permits	<p>Applicable laws and regulations</p> <p>Forest law 2019 Zakon o šumama (OG 140/05, 82/06, 129/08, 80/10, 124/10, 25/12, 68/12, 148/13, 94/14, 68/18, 14/19) https://narodne-novine.nn.hr/clanci/sluzbeni/2018_07_68_139_2.html</p> <p>Law on environmental Protection 2018 Zakon o zaštiti prirode (1994, 2007, OG 78/2015, 12/18). https://www.zakon.hr/z/403/Zakon-o-za%C5%A1titi-prirode</p> <p>Law on hunting 2018 Zakon o lovstvu (OG 99/18) https://www.zakon.hr/z/422/Zakon-o-lovstvu</p> <p>Ordinance on forest management 2018 Pravilnik o uređivanju šuma (OG 97/2018)</p>	<p>Global Forest Watch, Country profile 2019 https://www.globalforestwatch.org/dashboards/country/HRV</p> <p>Chatham House, Illegal Logging Indicators Country Report Card, 2019 https://www.illegal-logging.info/regions/Croatia</p> <p>FAO, global forest resources assessment report (FRA) for Croatia, 2010</p>	<p>Overview of Legal Requirements</p> <p>Harvesting of forest is based on planning that ensures and balances economic, social and ecological functions of the forests. This is stated in the Forest law, the Law on environmental Protection, Ordinance on forest management and the Law on hunting.</p> <p>Identified legislation is clearly defining management and harvesting planning and issuing harvesting permits. For the protected forests included in the ecological network a FMP contains identification number and code with evidence about stand type and protection.</p> <p>Forest operations and felling permits</p> <p>All forests in Croatia are multi-functional. According to the purpose, the forests in Croatia are divided into 3 main functions, and each has its own regulations:</p> <ul style="list-style-type: none"> <i>Commercial or productive forests.</i> All activities done are based on forest management plans. All national and international legislation, conventions, strategies and action plans on nature conservation are included in forest management plans. Forest owners are responsible for proposing the forest management plans, that further need to be approved

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>https://narodne-novine.nn.hr/clanci/sluzbeni/2018_11_97_187_5.html</p> <p>Ordinance on the Marking of Trees, Marking of Wood Assortments, Compensations and Forestry Order, 2015 Pravilnik o doznaci stabala, obilježavanju drvnih sortimenata, popratnici i šumskom redu (NN 17/2015, 57/2015)</p> <p>https://narodne-novine.nn.hr/clanci/sluzbeni/2015_02_17_332.html</p> <p>https://narodne-novine.nn.hr/clanci/sluzbeni/2017_06_57_127_0.html</p> <p>Legal Authority Ministry of Agriculture, https://poljoprivreda.gov.hr/</p> <p>Inspectorate of the Republic of Croatia https://inspektorat.gov.hr/</p> <p>Ministry of Environment and Energy https://www.mzoip.hr/en/</p> <p>Forest Advisory service (for private forests)</p> <p>Legally required documents or records</p>	<p>http://www.fao.org/3/al485/E/al485e.pdf</p> <p>FAO, FRA report 2015 http://www.fao.org/3/a-i4808e.pdf</p> <p>Forest Europe, Country report, 2015 http://foresteurope.org/sta-te-europes-forests-2015-report/#1476295965372-d3bb1dd0-e9a0</p> <p>State company Hrvatske šume, website 2019 http://portal.hrsume.hr/</p> <p>Hrvatske šume, GIS portal 2019 https://www.tportal.hr/biznis/clanak/ministarstvo-poljoprivrede-lani-provelo-50-000-inspekcijskih-nadzora-20180104</p> <p>CURIA, European court cases Croatia, 2019</p>	<p>by the Ministry responsible for forestry. For state forests, forest management plans are done by the Public company Hrvatske šume (except for forests managed by other public legal subjects, such as Ministry for protection). For private owners Forest Management Plans are often done by registered experts. Forest management plans are done for 10 years, and for their implementation, Operational Annual plans are developed. Part of the development of FMP's is also an assessment of the field situation (and HCV presence).</p> <p>All forest owners (including private) are thus obliged to register in the Forestry register, administrated by Ministry for Agriculture. They are obliged to have a Programme for managing private forests (a Forest Management Plan) and Operational annual plans for implementation. For small and middle private forests all planning is done by the Croatian Agricultural and Forestry Service, which was in 2019 joined with the Ministry of Agriculture. There are also funds for small owners to assist them with the process. In case such Program for managing private forest is not developed the Ministry responsible for forestry issues a 'Decision for the removal of trees' when this is not contradicting the regular Forest laws and regulations.</p> <p>The marking and felling are prescribed by the Ordinance on the Marking of Trees, Marking of Wood Assortments, Compensations and Forestry Order, which was amended in 2017. It prescribes the way and documentation for marking the trees for felling, marking and documentation for wood assortments, and, as well as necessary documentation for transport of wood and wood assortments (the 'transport certificate').</p> <p>Based on the approved annual plans marking trees for harvest is possible. The marking of trees in forests and on forest land is done by a forestry contractor who possesses the corresponding license of the Forestry Chamber and based upon the Request for marking. State and big private</p>

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	<p>Forest silvicultural management plans and forest management units plans are publicly available only at the office of Croatian Forests Ltd.</p> <p>Forest management plans include Natura 2000 sites in forests. Natura 2000 plans and FM plans are identical.</p> <p>Following the EU Timber Regulation No. 995/2010 records of sold wood must be kept by the operator for 5 years.</p> <p>Other documents</p> <p>Business report on Croatian forests https://www.hrsume.hr/index.php/en/annual-statements</p> <p>Forest management plan of the republic of Croatia (FMAP) valid for the period 1.1.2016-31.12.2025. 2017 Šumskogospodarska Osnova Šumskogospodarskog područja Republike Hrvatske–vrijedi od 1.1.2016. do 31.12. 2025. Godine. https://poljoprivreda.gov.hr/istaknute teme/sume-112/sumarstvo/sumskogospodarska-osnova-2016-2025/250</p> <p>Inspection service / Croatian Agency for Environment and Nature (HAOP)(Hrvatska agencija za okoliš I zaštitu prirode). Now part of MEPE.</p>	<p>http://curia.europa.eu/juris/recherche.jsf?ogp=&for=&mat=or&jge=&td=%3BALL&jur=C%2CT%2CF&dates=&pcs=Oor&lg=&pro=&nat=or&cit=none%252C%252CCJ%252CR%252C2008E%252C%252C%252C%252C%252C%252C%252C%252Ctrue%252Cfalse%252Cfalse&language=hr&avg=&cid=6486960</p> <p>WWF Adria, website 2019 http://www.wwfadria.org/p rojekti/sume/</p> <p>NGO Zelena akcija, website 2019 https://zelena-akcija.hr/</p> <p>NGO Zeleni odred, website 2019 http://veteranivdra.hr/akti vnosti/</p> <p>Transparency International, CPI index 2019</p>	<p>forest owners are obliged to enter the data on trees marked for felling into an electronic register of records, while for small and medium forest owners the registration is done by the Ministry for agriculture. In all forests, only the removal of marked trees is allowed. After the registration of data a harvesting permit can be requested.</p> <p>There are amendments made to the Ordinance on the Marking of Trees, Marking of Wood Assortments, Compensations and Forestry Order from 2017 for the purpose of establishing traceability in accordance with the EU Timber Regulation (EUTR). This to guarantee properly labelled wood assortments for which a transport certificate is needed. Such document lists the load from the first storage location to the final processing site. When entering the market and transport, the owner of the wood assortments shall have copies of all accompanying documents and other relevant documentation (invoice, etc.) proving the origin of the purchased goods. With private forest owners such transport certificates are to be issued by a forestry contractor who possesses the corresponding license of the Forestry Chamber. In case of State forests these are issued by Public company Hrvatske šume.</p> <ul style="list-style-type: none"> • <i>Protective forests.</i> In these forests forest management activities are limited and production of wood assortments is a result of silvicultural work. Management of protective forests is done by the forest owner in accordance with forest management plans. The organization and procedure of harvesting the wood and wood assortments from protective forests is the same as described in productive forests above, but extra regulations about protection are to be complied with. • <i>Special purpose forests.</i> As explained in the overview text there are 6 types of special purpose forest and under the 'protection' type there are 9 classes of protection.

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	<p>http://www.haop.hr Annual reports: http://www.haop.hr/hr/godisnja-izvjesca-o-pracenju-emisija-oneciscujucih-tvari-u-zrak-iz-nepokretnih-izvora-na-teritoriju</p> <p>Official website of the Ministry of Agriculture https://poljoprivreda.gov.hr/o-ministarstvu/92019 Annual reports https://poljoprivreda.gov.hr/istaknute teme/poljoprivreda-173/poljoprivredna-politika/agroekonomske-analize/zeleno-izvjesce/189</p> <p>Official website of Hrvatske šume https://www.hrsume.hr 2019 Annual reports: https://www.hrsume.hr/index.php/en/annual-statements</p> <p>Official website of the Ministry for Environmental Protection and Energy (MEPE) 2019 https://www.mzoip.hr/hr/priroda.html 2019 Annual reports: https://mzoe.gov.hr/pristup-informacijama/strategije-planovi-i-ostali-dokumenti/godisnje-izvjesce-o-radu-ministarstva/1072</p>	<p>https://www.transparency.org/country/HRV</p> <p>UNECE report 2004 http://www.unece.org/fileadmin/DAM/timber/docs/se m/2004-1/full_reports/Croatia.pdf</p> <p>FSC, website 2019 https://info.fsc.org/certificate.php</p> <p>Local expert 2019.</p>	<p>The class of 'strict reserves' forbids all economic activities, and in the class of 'national park' economic use of natural goods is prohibited. For forests and forest land in the area of the national park and strict reserve, separate management units are formed and in charge for adopting a Forest protection program which contains measures for their protection. Forest operations are done in accordance with forest management plans for the management unit which set out the conditions for fair use forests and forest land and interventions in this area, the required scope of forest breeding and protection, possible degree of utilization and conditions for the management of the animal world. In general, all strict reserves and national parks do not have forest management plans, nor is this required. In other protected areas commercial and other activities are allowed under the condition that they do not endanger or alter significant characteristics of the protected area, according to the forest management plans.</p> <p>The organization and procedure of harvesting the wood and wood assortments from the other types and classes under this special purpose forest group are the same as described in productive forests above, but extra regulations about protection are to be complied with.</p> <p><i>The permits</i> All harvesting operations must be done based on a harvesting permit. The harvesting permit prescribes quantity, tree species and number of trees in each diameter class. Finished forest operations are checked and recorded by the government. Forest operators follow a Due Diligence System (DDS) system prescribed in EU Timber Regulation No. 995/2010 (which is part of the Ordinance on the Marking of Trees, Marking of Wood Assortments, Compensations and Forestry Order). Harvesting can be done only by licensed forester, or in other case by a registered operator.</p>

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	<p>Croatian Agency for Environment and Nature 2019 http://envi-metapodaci.azo.hr/geonetwork/srv/hrv/catalog.search#/metadata/5f8947fc-67f7-446d-9dea-c83dae24fa89 <i>Annual reports:</i> http://www.haop.hr/hr/godisnja-izvjesca-o-pracenju-emisija-oneciscujucih-tvari-u-zrak-iz-nepokretnih-izvora-na-teritoriju</p>		<p>There are several versions of harvesting permits: regular harvesting, road building, sanitary cut and forest tending. They are based on the same legislation. The difference between the 4 is the main aim of harvesting. 'Regular' and 'roads' include regular and scheduled harvesting. A 'sanitary' cut means harvesting trees by purpose of removing insects or diseases. 'Tending' means brushing and high pruning of conifers and the formative shaping of broadleaves to improve stem form and wood. But although these documents have different names the procedures are the same. Except for road building, as this is an infrastructural work, often related to spatial planning, and require a land use change.</p> <p>The Firewood case Both with state and private cases a permit is needed to harvest firewood, as this should be in line with the FMP.</p> <p>State forests: According to the Forest law, non-professionals (the local population), who are trained in harvesting operations (safe work with a chainsaw), are allowed to buy and process for their own purposes up to 30 m3 of firewood per year (self-processing), with the permission and under the supervision of the person who manages these forests. It means that natural persons (not companies) can work in state forest to harvest max 30 m3 of firewood if they are trained in harvesting operations. This is not for commercial purposes and cannot be sold as such. Thus commercial firewood from state can never enter the market.</p> <p>Private forest: the situation is more unclear. And no data is available. Due to the allowed volume of self-processing (30 m3) many private forest owners are harvesting this firewood themselves and there is not much, if any, supervision taken place. Deficiency of legal provisions gives an unclear picture of the level and type of qualifications that must be met by non-professionals, as well as of the qualifications of the supervisory staff when the harvesting works are carried out in private forests. Private forest owners</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
			<p>work on their own responsibility. Nevertheless, they have to follow the same laws and regulations.</p> <p>State inspection and law enforcement</p> <p>The State Inspection service also includes the forestry and hunting inspection and is in charge with law enforcement on forests and forest land owned by the state and private. There are state inspectors and regional inspectors. The inspection service can also request the help of the Forestry Chamber to judge the technical quality of the work carried out in the field. Inspections are taking place throughout the country.</p> <p>There are no publically available reports by the government about illegal harvesting, court cases or State inspection reports in the forestry sector. Such is also not reported in the annual reports the of Ministry of Agriculture, Hrvatske šume ltd, the Croatian Agricultural and Forestry Advisory Service, the Ministry for Environmental Protection and Energy or the Croatian Agency for Environment and Nature.</p> <p>It can be found that the Forest inspection in year 2017, for example, made 2 317 surveillances, but no further content or conclusions are reported.</p> <p>Description of Risk</p> <ol style="list-style-type: none"> 1. With regards to harvesting the regulations are strict. Maybe there is a doubtful role of the mentioned forestry contractors (who possesses the corresponding license of the Forestry Chamber). In theory they could develop the Forest Management Plans (FMP), design the annual plans, register the marked and harvested trees, do the harvesting and issue a transport document. And although the FMP, the annual plans and the online Register of records are evaluated by state, and inspections take place, there is a potential conflict of interest with private landowners. Nevertheless, such contractors need licenses for each of these jobs

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			<p>separately, need to pass an exam for each of them and have to follow update training courses at regular intervals. They can also lose their license when mistakes are made (source: local expert).</p> <p>2. About 30% of the private forest owners do not yet have an FMP, although Croatia aims to develop the remaining 30% within a few years (Source: FMAP, general FMP). In principle there is thus a chance that, on these 30%, things can go wrong. Because when harvesting will take place it will not be based on planning. However, this is solved by the government by the system of 'Decisions for the removal of trees'. Private owners can request a harvesting permit and the ministry assesses the regular Forest laws and regulations and send a registered expert to assess the situation in the field. This system is in place and working and thus the 'management' part seems to be in order (Source: Local expert).</p> <p>3. Fuelwood harvest without permits. There is no available official data about illegal harvesting in state or any other forests. Inspections results are not publically available. Following an informal message from Hrvatske šume ltd an estimation is that illegal logging amounts up to 1% of the annual allowable cut. This is the total illegal cutting and includes the extraction of firewood. This is a substantial claim but cannot be verified (source: local expert).</p> <p>What other sources say International sources like FAO (global forest resources assessment), Chatham House (Illegal Logging Portal), Global Forest Watch and Forest Europe are not reporting anything with regards to this indicator. One older report by the UNECE (Republic of Croatia illegal logging and trade of illegally-derived forest products 2004), does not report anything significant and is too old anyway. There are no other official international reports or</p>

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			<p>international messages about substantial illegal harvesting inside Croatia because of a problem with permits. The country is not associated with or designated as source of conflict timber according to latest available research.</p> <p>There are no European court cases filed against Croatia that handle about this topic (CURIA 2019).</p> <p>Almost all state forests in Croatia have an FSC certificate which states that forests are managed according to strict ecological, social and economic standards which include conservation and enhancement of biodiversity. Regular renewal of FSC certificate is also a confirmation that all the required standards have been met in the previous period. See for all data about certification indicator 1.3.</p> <p>The total amount of forest in Croatia, and the growing stock (in m3), is growing every year, over the last decades. The current stock stands at 167 m3/ha. This means a very healthy forest in Europe. In the period 2006 to 2016 the growing stock increased by 5 %. The annual increment is 5,87 m3/ha. There is no large scale deforestation taking place as this would be observed in mapping and forest management planning and reduced stocks/ha. This confirms that the forests stay as they are (source: FMAP, various annual reports, see left column, and for more details see indicator 1.3).</p> <p>The local sources WWF Adria, NGO Zelena akcija and NGO Zeleni odred are following forest activities, raising awareness about the forest protection and fighting against illegal logging. But they are not reporting shortfalls with the harvesting permits system.</p> <p>The CPI index for Croatia in 2019 stands at 47 (where 1 is most corrupt). According to FSC directive (FSC-DIR-40-005) we have to take extra care</p>

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			<p>when the Corruption Perception Index (CPI) for the given country is equal to or below 50. This is the case for Croatia and on top of that there is a downwards trend for the last year which is not good news.</p> <p>Its means that in general we have to be careful with relying on governmental sources only and we have to look at other, independent, sources for confirmations of data and statements where possible.</p> <p>Risk Conclusion Although it seems that the system of harvesting permits is in place and implemented there are a few doubts that justify the use of the precautionary approach. The main doubt is that there is no public data about illegal logging and inspection results. We could thus not assess if the permit system in place is actually well enforced and working. As most State forest are FSC certified a potential problem can only be expected in private forests</p> <p>Low risk for state forests. Low risk threshold (1) is met:</p> <p>Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the authorities and/or by the relevant entities.</p> <p>'Specified risk' threshold (2) applies for private forests: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.</p>
Taxes and fees			
1.5 Payment of royalties and	<p>Applicable laws and regulations N/A There are no harvesting and royalty fees.</p> <p>Legal Authority N/A</p>	<p>Tax Consultants International, website 2019</p> <p>https://www.tax-consultants-</p>	<p>There are no harvesting and royalty fees in place, and there are also no legal requirements to pay anything. Governmental staff does all the preparation, permit and monitoring work for all forest owners (including private) and there is no fee.</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
harvesting fees	<p>Legally required documents or records N/A</p> <p>Other documents Ministry of Finance, license cost / royalties 2019 Licence or tantijema regulations in Croatia 2019 https://carina.gov.hr/propisi-i-sporazumi/carinska-tarifa-vrijednost-i-podrijetlo/carinska-vrijednost/novosti-3617/troskovi-licence-tantijeme-usluga-iz-europske-unije-3621/3621</p>	<p>international.com/read/Croatia_royalties_tax</p>	<p>Risk conclusion This indicator is considered N/A.</p>
1.6 Value added taxes and other sales taxes	<p>Applicable laws and regulations</p> <p>Law on value added tax (PDV) 2018 Zakon o porezu na dodanu vrijednost (OG 106/18) http://www.porezna-uprava.hr/hr_propisi/layouts/in2.vuk.sp.propisi.internet/propisi.aspx?id=pro1467</p> <p>Cadastral income tax 1995 Zakon o ugotavljanju katastrskega dohodka (OG 108/95) https://narodne-novine.nn.hr/clanci/sluzbeni/1995_12_108_1783.html</p> <p>Forest law 2019 Zakon o šumama (OG 140/05, 82/06, 129/08, 80/10, 124/10, 25/12, 68/12, 148/13, 94/14, 68/18, 14/19) (Including the Regulation regarding the maintenance of forest roads and the minister decree on allocation of fees for maintenance of roads (Article 69/2))</p>	<p>Local expert 2019</p> <p>Global Forest Watch, Country profile 2019 https://www.globalforestwatch.org/dashboards/country/HRV</p> <p>Chatham House, Illegal Logging Indicators Country Report Card, 2019 https://www.illegal-logging.info/regions/Croatia</p>	<p>Overview of Legal Requirements Forest owners have a basic option, according to the Law on value added tax):</p> <p>Paying income taxes based on cadastral income regardless of the sold timber (Law on cadastral income tax). This is often happening with private owners that do not have their own companies. These are not eligible for VAT either.</p> <p>Or operate as normal companies. And pay income/profit tax over the sold timber. For this standard tax % and calculation are used, just like in any other European country. The bigger forest owners are thus legal entities/farmers and are registered for VAT as well when selling the timber.</p> <p>Besides that, there is a special regulation about the maintenance of forest roads (Regulation regarding the maintenance of forest roads). Forest owners (except small scale private forest owners with ownership up to 20 ha) pay a flat fee of 5 % of their income from timber selling to local administration for maintaining forest roads. That is then distributed to municipalities (Regulation regarding the maintenance of forest roads and</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>https://narodne-novine.nn.hr/clanci/sluzbeni/2018_07_68_1392.html</p> <p>Law on minor offences 2018 Prekršajni zakon (OG118/18) https://www.zakon.hr/z/52/Prekr%C5%A1ajni-zakon</p> <p>The Law on amendments to the real estate tax act 2018 Zakon o izmjeni Zakona o porezu na promet nekretnina (NN 106/2018) https://narodne-novine.nn.hr/clanci/sluzbeni/2018_11_106_2060.html</p> <p>Criminal code 2018 Kazneni zakon (OG 118/18) https://www.zakon.hr/z/98/Kazneni-zakon</p> <p>Legal Authority Ministry of Finance http://www.mfin.hr/en</p> <p>Tax Administration of Republic of Croatia https://www.porezna-uprava.hr/Stranice/Naslovnica.aspx</p> <p>Legally required documents or records Tax records.</p>	<p>State company Hrvatske šume, website 2019 http://portal.hrsume.hr/</p>	<p>the minister decree on allocation of fees for maintenance of roads -Forest law, article 69/2).</p> <p>There are no existing taxes on forest or agriculture land in ownership. In case of buying or selling of land the tax is 3% (The law on amendments to the real estate tax act).</p> <p>There are no other sales taxes.</p> <p>Offenders are prosecuted following the Law on minor offences and the Criminal code.</p> <p>Description of Risk Taxes are regularly collected and there are no large problems known in the forestry sector because of VAT (source: local expert and international sources).</p> <p>It is not possible to have land in ownership and not pay taxes as the state can easily issue and assign a debt in the cadaster to lands of the forest owner. When debt is big enough the land is then sold by a public court tender. Nevertheless, this is rare. Unpaid taxes are possible in the case of companies or in rare cases by a person going bankrupt (source: local expert and international sources).</p> <p>Local and international sources (Global Forest Watch, Chatham House and State company Hrvatske šume)and the local expert do not list any further problems with regards to this topic.</p> <p>Risk Conclusion All together the risk with regards to this indicator are low.</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
			Low risk threshold (1) is met: Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the authorities and/or by the relevant entities.
1.7 Income and profit taxes	<p>Applicable laws and regulations</p> <p>Law on income tax 2019 Zakon o porezu na dobit (NN 177/04, 90/05, 57/06, 146/08, 80/10, 22/12, 148/13, 143/14, 50/16, 115/16, 106/18, 121/19, 32/20) https://www.zakon.hr/z/99/Zakon-o-porezu-na-dobit</p> <p>Law on income tax add-on 2019 Zakon o porezu na dohodak (NN 115/16, 106/18, 121/19, 32/20) https://www.zakon.hr/z/85/Zakon-o-porezu-na-dohodak</p> <p>Law on state measurement and cadastre 2018 Zakon o državnoj izmjeru i katastru (NN 112/18) https://www.zakon.hr/z/156/Zakon-o-dr%20avnoj-izmjeri-i-katastru-nekretnina</p> <p>Cadastral income tax 1995 Zakon o utvrđivanju katastarskog prihoda (OG 108/95) https://narodne-novine.nn.hr/clanci/sluzbeni/1995_12_108_1783.html</p> <p>Law on minor offences 2018 Prekršajni zakon (OG118/18)</p>	<p>Local expert 2019</p> <p>Global Forest Watch, Country profile 2019 https://www.globalforestwatch.org/dashboards/country/HRV</p> <p>Chatham House, Illegal Logging Indicators Country Report Card, 2019 https://www.illegal-logging.info/regions/Croatia</p> <p>Deloitte, International Taxes Croatia 2019 https://www2.deloitte.com/content/dam/Deloitte/global/Documents/Tax/dttl-tax-croatiainfohighlights-2018.pdf?nc=1</p>	<p>Overview of Legal Requirements</p> <p>Forest owners have a basic option, according to the Law on income tax :</p> <p>Paying income taxes based on cadastral income regardless of the sold timber (Law on cadastral income tax). This is often happening with private owners that do not have their own companies. These are not eligible for VAT either.</p> <p>Or operate as normal companies. And pay income/profit tax over the sold timber. For this standard tax % and calculation are used, just like in any other European country. The bigger forest owners are thus legal entities/farmers and are registered for VAT as well when selling the timber.</p> <p>Besides that, there is a special regulation about the maintenance of forest roads (Regulation regarding the maintenance of forest roads). Forest owners (except small scale private forest owners with ownership up to 20 ha) pay a flat fee of 5 % of their income from timber selling to local administration for maintaining forest roads. That is then distributed to municipalities (Regulation regarding the maintenance of forest roads and the minister decree on allocation of fees for maintenance of roads minister decree on allocation of fees for maintenance of roads - Forest Law Forest law article 69/2).</p> <p>There are no existing taxes on forest or agriculture land in ownership.</p> <p>In case of buying or selling of land the tax is 5%.</p> <p>Offenders are prosecuted following the Law on minor offences and the Criminal code.</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>https://www.zakon.hr/z/52/Prekr%C5%A1ajni-zakon</p> <p>Criminal code 2018 Kazneni zakon (OG 118/18) https://www.zakon.hr/z/98/Kazneni-zakon</p> <p>Legal Authority Ministry of finance http://www.mfin.hr/en</p> <p>Tax Administration of Republic of Croatia https://www.porezna-uprava.hr/Stranice/Naslovnica.aspx</p> <p>Legally required documents or records Tax records.</p>	<p>State company Hrvatske šume, website 2019 http://portal.hrsume.hr/</p> <p>Croatia, privatization, report wood industry Česma, 2017 http://www.revizija.hr/izvje-sca/2007/revizije-pretvorbe-i-privatizacije/155-drvna-industrija-cesma-bjelovar.pdf</p>	<p>According to the Deloitte report 2018, residents are taxed according to their worldwide income. Non-residents are taxed on their Croatian source income. Accounting principles and financial statements are according to the international standards. Croatia follows the International Financial Reporting Standards (IFRS) which is an accounting standard issued by the IFRS Foundation and the International Accounting Standards Board (IASB).</p> <p>Description of Risk uring the transition process (privatization of industry, 1990-2000) some wood sawmill companies were sold due to the insolvency (Privatization report Česma company). State forest company does not have that kind of issues. There are no further plans for privatizations in the forest sector (source: local expert).</p> <p>What other sources say. No further cases are known where companies in the forest sector are in debt, nor are there any such cases mentioned in the media, or mentioned by the local expert.</p> <p>Local and international sources do not list any problems with regards to this topic (Deloitte, Global Forest Watch, Chatham House and State company Hrvatske šume and local expert).</p> <p>Risk Conclusion All together the risk with regards to this indicator are low.</p> <p>Low risk threshold (1) is met: Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the authorities and/or by the relevant entities.</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
Timber harvesting activities			
1.8 Timber harvesting regulations	<p>Applicable laws and regulations</p> <p>Forest law 2019 Zakon o šumama (OG 140/05, 82/06, 129/08, 80/10, 124/10, 25/12, 68/12, 148/13, 94/14, 68/18, 14/19) https://narodne-novine.nn.hr/clanci/sluzbeni/2018_07_68_139_2.html</p> <p>Rules on forest working types, minimal conditions for their implementation and work which forest owners can perform individually 2018 Pravilnik o vrsti šumarskih radova, minimalnim uvjetima za njihovo izvođenje te radovima koje šumoposjednici mogu izvoditi samostalno (OG 16/15 i 30/2018) https://narodne-novine.nn.hr/clanci/sluzbeni/2018_03_30_617.html</p> <p>Rules on tree marking, wood assortments marking, trade document and forest order 2015 Pravilnik o doznaci stabala, obilježavanju drvnih sortimenata, popratnici i šumskom redu (NN 17/2015) https://narodne-novine.nn.hr/clanci/sluzbeni/2015_02_17_332.html</p>	<p>Local expert 2019</p> <p>European court cases against Croatia, CURIA 2019 http://curia.europa.eu/juris/recherche.jsf?oqp=&for=&mat=or&jge=&td=%3BALL&jur=C%2CT%2CF&dates=&pcs=Oor&lg=&pro=&nat=or&cit=none%252C%252CCJ%252CR%252C2008E%252C%252C%252C%252C%252C%252C%252C%252Ctrue%252Cfalse%252Cfalse&language=hr&avg=&cid=6486960</p> <p>Global Forest Watch, Country profile 2019 https://www.globalforestwatch.org/dashboards/country/HRV</p> <p>Chatham House Illegal Logging Indicators Country Report Card, 2019</p>	<p>Overview of Legal Requirements</p> <p>General harvesting regulations are in place and enforced since many decades throughout the 'Forest law', 'Rules on forest working types, minimal conditions for their implementation and work which forest owners can perform individually' and 'Rules on tree marking, wood assortments marking, trade document and forest order'.</p> <p>These regulations explain how to mark the trees and how to harvest a tree. It also explains what to do with waste material, how to stack the timber on the roadside and some minor topics. The 3 documents combined also explain the legal requirements for harvesting techniques and technology, including selective cutting, clear felling, transport of timber from the felling site, seasonal limitations, the size of felling areas, minimum age and/or diameter for felling activities, and elements that shall be preserved during felling, establishment of skidding or hauling trails, road construction, drainage systems and bridges besides the normal planning and monitoring of harvesting activities (as explained in earlier indicators).</p> <p>There are also some additional measures set in the various regulations about the Ecological network (Natura 2000). See indicator 1.9 for more information and the sources. But these laws have resulted in additional topics in the FMP's as follows (examples given by topic numbers in the FMP):</p> <ul style="list-style-type: none"> • 121: Management of forest according to the principles of forest certification in state forests (for private owner this is of course voluntary). This doesn't mean it is obligatory, but advisable. No selection is made between forest certification standards.

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	<p>Law on Croatian Chamber of Forestry and Wood Technology Engineers 2006 Zakon o Hrvatskoj komori inženjera šumarstva i drvne tehnologije (22/06). https://narodne-novine.nn.hr/clanci/sluzbeni/2006_02_22_528.html <i>Including the ‘Ordinance on issuing, renewal and revocation of the license for forestry, game management and wood processing operations, Croatian Chamber of Forest and Wood Technology Engineers’.</i></p> <p>Legal Authorities: Ministry of Agriculture, https://poljoprivreda.gov.hr/</p> <p>Inspectorate of the Republic of Croatia State Inspection Service Ministry of Environment and Energy https://www.mzoip.hr/en/</p> <p>Forest Advisory service (for private forests) of the ministry.</p> <p>Legally required documents or records Forest Silvicultural management plans and forest Management Units Plans are publicly available only at the office of Croatian Forests Ltd.</p>	<p>https://www.illegal-logging.info/regions/Croatia</p> <p>Landekić, M., et al. Private Entrepreneurship in the Forestry Sector of the Republic of Croatia - Status and Perspectives. 2011 https://www.bib.irb.hr/649083</p> <p>WWF Adria, website 2019 http://www.wwfadria.org/projekti/sume/</p> <p>NGO Zelena akcija, 2019 https://zelena-akcija.hr/</p> <p>NGO Zeleni odred, website 2019 http://veteranivodra.hr/aktivnosti/</p> <p>Transparency International, CPI index 2019 https://www.transparency.org/country/HRV</p> <p>UNECE Republic of Croatia illegal logging and</p>	<ul style="list-style-type: none"> • 122: Where possible and appropriate, when performing final cut in an even-aged forest leave small patches of forest untouched • 123: Preserve to a large extent forest clearings (pastures, meadows), as well as forest edges • 124: Secure the prolongation of rotation period of the autochthonous tree species, bearing in mind the physiological age of respective species and health status of the forest ecosystems • 125: Avoid usage of chemical agents and control agents for the plant protection; not to use genetically modified organisms • 126: Preserve biological species significant for the respective habitat types; not to introduce autochthonous and genetically modified organisms. • 127: Secure a permanent percentage of mature, old and dry (both standing and on the ground) trees, especially those with cavities • 128: Assure the appropriate preservation and monitoring of rare and endangered wild species • 129: Where site conditions allow, perform afforestation and reforestation with “close-to-nature” methods and with autochthonous tree species and in a mixture which represents natural development. The afforestation of non-forest areas should be done only where it does not jeopardize rare or endangered non-forest habitat types. <p>Forest workers For forest workers and licensed engineers, experts and contractor there are 2 relevant documents: a) Law on Croatian chamber of forestry and wood processing engineers and b) the Ordinance on issuing, renewal and revocation of the license for forestry, game management and wood processing operations, Croatian chamber of forest and wood technology engineers. These documents also state what is required to become a licensed expert:</p> <ol style="list-style-type: none"> 1. Evidence of legal personality, or registration. Excerpt from the court, professional or trade register.

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Harvesting permits.</p> <p>Annual reports Business report on Croatian forests 2019 https://www.hrsume.hr/index.php/en/annual-statements</p> <p>State Inspection service / Croatian Agency for Environment and Nature (HAOPNow part of MEPE. 2019 http://www.haop.hr <i>Annual reports:</i> http://www.haop.hr/hr/godisnja-izvjesca-o-pracenju-emisija-oneciscujucih-tvari-u-zrak-iz-nepokretnih-izvora-na-teritoriju</p> <p>Official website of the Ministry of Agriculture 2019 https://poljoprivreda.gov.hr/o-ministarstvu/9 <i>Annual reports</i> https://poljoprivreda.gov.hr/istaknute teme/poljoprivreda-173/poljoprivredna-politika/agroekonomske-analize/zeleno-izvjesce/189</p> <p>Official website of Hrvatske šume 2019 https://www.hrsume.hr <i>Annual reports:</i> https://www.hrsume.hr/index.php/en/annual-statements</p>	<p>trade of illegally-derived forest products 2004 http://www.unece.org/fileadmin/DAM/timber/docs/se m/2004-1/full_reports/Croatia.pdf</p> <p>FSC, website 2019 https://info.fsc.org/certificate.php</p>	<ol style="list-style-type: none"> 2. Evidence of the required number of employees. List of employees of the legal entity that will perform the operations that require the license, certified by the responsible person. 3. Evidence of the required quantity of procured machines, equipment, measuring instruments and tools for performing a certain type or stage of work. 4. Evidence of the professional qualifications of workers and of competence of responsible persons – certified engineers. 5. Evidence of certificates and attests for the machinery, equipment, measuring instruments and tools required for a safe and reliable performance of a certain type or phase of work. 6. Other documentation prescribed by special regulations. For type of work: silvicultural operations, forest nursery operations, timber harvesting, construction and maintenance of forest infrastructure, urban forestry – evidence of workers’ qualifications for work safety; for type of work: protection of forests from harmful organisms – evidence of workers’ qualifications for handling hazardous substances. 7. A statement of the firm’s overall turnover in the preceding year. 8. Statement on the quantity of work performed in the preceding year. 9. Statement of the responsible person on temporary/interim performance of activities in Republic of Croatia. <p>The process of licensing of private entrepreneurs in forestry of Croatia began by 1 October 2007. Up to date 356 companies of different kinds have been licensed, out of which 80% are active and 20% had their license revoked due to their non-compliance. From the 286 active companies that have complete or partial license for at least one of the nine types of forestry operations, 229 of them (80% of all active companies) have license for harvesting and 135 licenses (47% of active companies) have been issued for performing silvicultural operations. Companies registered as sole proprietorship are mostly holders of licenses for</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Official website of the Ministry for Environmental Protection and Energy (MEPE) 2019 https://www.mzoip.hr/hr/priroda.html 2019 <i>Annual reports:</i> https://mzoe.gov.hr/pristup-informacijama/strategije-planovi-i-ostali-dokumenti/godisnje-izvjesce-o-radu-ministarstva/1072</p> <p>Croatian Agency for Environment and Nature 2019 http://envi-metapodaci.azo.hr/geonetwork/srv/hrv/catalog.search#/metadata/5f8947fc-67f7-446d-9dea-c83dae24fa89 <i>Annual reports:</i> http://www.haop.hr/hr/godisnja-izvjesca-o-pracenju-emisija-oneciscujucih-tvari-u-zrak-iz-nepokretnih-izvora-na-teritoriju</p> <p>Other documents Forest management plan of the republic of Croatia (FMAP) valid for the period 1.1.2016-31.12.2025. 2017 Šumskogospodarska Osnova Šumskogospodarskog područja Republike Hrvatske–vrijedi od 1.1.2016. do 31.12. 2025. Godine. https://poljoprivreda.gov.hr/istaknute teme/sume-112/sumarstvo/sumskogospodarska-osnova-2016-2025/250</p>		<p>operations of direct forestry production (harvesting and silviculture), and the companies registered as a limited (Ltd.) have licenses related to tree marking, urban forestry, management of private forest estates and for making forest and hunting management plans.</p> <p>In the period from 2000 to 2010 there has been an increase in the share of private entrepreneurs in the fields of felling, hauling, skidding and transport of lumber. The activity of private entrepreneurs in felling within the same period has doubled from 10% to 23%. Their share in hauling and skidding is held at a constant rate (41%), which means that Croatian Forests Ltd. have performed 58% of the respective activities. The share of private entrepreneurs in the transport of logs in 2010 was 83%, which represents an increase of 15% with respect to year 2000. (Landekić et al., 2011).</p> <p>State inspection and law enforcement The State Inspection service also includes the forestry and hunting inspection and is in charge with law enforcement on forests and forest land owned by the state and private. There are state inspectors and regional inspectors. The inspection service can also request the help of the Forestry Chamber to judge the technical quality of the work carried out in the field. Inspections are taking place throughout the country.</p> <p>There are no publically available State inspection reports about harvesting violations or resulting court cases. Such is also not reported in the annual reports the of Ministry of Agriculture, Hrvatske šume ltd, the Croatian Agricultural and Forestry Advisory Service, the Ministry for Environmental Protection and Energy or the Croatian Agency for Environment and Nature.</p> <p>It can be found that the Forest inspection in year 2017, for example, made 2 317 surveillances, but no further content or conclusions are reported.</p>

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			<p>Description of Risk</p> <ol style="list-style-type: none"> 1. With regards to harvesting the regulations are strict. Maybe there is a doubtful role of the mentioned forestry contractors (who possesses the corresponding license of the Forestry Chamber). In theory they could develop the Forest Management Plans (FMP), design the annual plans, register the marked and harvested trees, do the harvesting and issue a transport document. And although the FMP, the annual plans and the online Register of records are evaluated by state, and inspections take place, there is a potential conflict of interest with private landowners. Nevertheless, such contractors need licenses for each of these jobs separately, need to pass an exam for each of them and have to follow update training courses at regular intervals. They can also lose their license when mistakes are made (source: local expert). 2. No data about violations. Inspections results are not publically available. Following an informal message from Hrvatske šume ltd an estimation is that illegal logging amounts up to 1% of the annual allowable cut. This is the total illegal cutting and includes the extraction of firewood. Such can also be related to not following the harvesting regulations. This is a substantial claim but cannot be verified (source: local expert). 3. Increasing work by private entrepreneurs. In the period from 2000 to 2010 there has been an increase in the share of private entrepreneurs in the fields of felling, hauling, skidding and transport of lumber. The activity of private entrepreneurs in felling within the same period has doubled from 10% to 23%. Their share in hauling and skidding is held at a constant rate (41%), which means that Croatian Forests Ltd. have performed 58% of the respective activities. The share of private entrepreneurs in the transport of logs in 2010 was 83%, which

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			<p>represents an increase of 15% with respect to year 2000. In theory this means that it is even more important to have strict regulations and law enforcement in place (Landekić et al., 2011).</p> <p>What other sources say International sources like FAO (global forest resources assessment), Chatham House (Illegal Logging Portal), Global Forest Watch and Forest Europe are not reporting anything with regards to this indicator. One older report by the UNECE (Republic of Croatia illegal logging and trade of illegally-derived forest products 2004), does not report anything significant and is too old anyway. There are no other official international reports or international communications about substantial illegal harvesting inside Croatia because of a problem with harvesting regulations.</p> <p>There are no European court cases filed against Croatia that handle about this topic (CURIA 2019).</p> <p>The CPI index for Croatia in 2019 stands at 47 (where 1 is most corrupt). According to FSC directive (FSC-DIR-40-005) we have to take extra care when the Corruption Perception Index (CPI) for the given country is equal to or below 50. This is the case for Croatia and on top of that there is a downwards trend for the last year which is not good news. Its means that in general we have to be careful with relying on governmental sources only and we have to look at other, independent, sources for confirmations of data and statements where possible.</p> <p>The total amount of forest in Croatia, and the growing stock (in m3), is growing every year, over the last decades. The current stock stands at 167 m3/ha. This means a very healthy forest in Europe. In the period 2006 to 2016 the growing stock increased by 5 %. The annual increment is 5,87 m3/ha. There is no large scale deforestation taking place as this would be observed in mapping and forest management planning and reduced</p>

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			<p>stocks/ha. This confirms that the forests stay as they are (source: FMAP, various annual reports, see left column, and for more details see indicator 1.3).</p> <p>The local sources WWF Adria, NGO Zelena akcija and NGO Zeleni odred are following forest activities, raising awareness about the forest protection and fighting against illegal logging. But they are not reporting shortfalls with the harvesting regulations system.</p> <p>Almost all state forests in Croatia have an FSC certificate which states that forests are managed according to strict ecological, social and economic standards which include conservation and enhancement of biodiversity. Regular renewal of FSC certificate is also a confirmation that all the required standards have been met in the previous period. See data about certification in indicator 1.3.</p> <p>Risk Conclusion</p> <p>Although it seems that the system of harvesting regulations is in place and implemented there are a few doubts that justify the use of the precautionary approach. The main doubt is that there is no public data about illegal logging and inspection results. We could thus not assess if the system in place is actually well enforced and working. As most State forest are FSC certified a potential problem can only be expected with private forest owners.</p> <p>Low risk for state forests. Low risk threshold (1) is met:</p> <p>Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the authorities and/or by the relevant entities.</p> <p>Specified risk for private forests. 'Specified risk' threshold (2) applies:</p>

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	<p>novine.nn.hr/clanci/sluzbeni/2018_07_68_1392.html</p> <p>Law on environmental protection 2019 Zakon o zaštiti prirode (OG 14/19). https://www.zakon.hr/z/403/Zakon-o-za%C5%A1titi-prirode</p> <p>Environmental law 2013 Zakon o zaštiti okoliša (OG 80/13 , 153/13 , 78/15 , 12/18 , 118/18). https://www.zakon.hr/z/194/Zakon-o-za%C5%A1titi-okoli%C5%A1a</p> <p>Regulation on strategic environmental assessment of strategies, plans and programmes on the environment 2017 Uredbu o strateškoj procjeni utjecaja strategije, plana i programa na okoliš (3/17). http://www.propisi.hr/print.php?id=8162.</p> <p>Regulation on information and participation of the public and public concerned in environmental matters 2008 Uredbu o informiranju i sudjelovanju javnosti i zainteresirane javnosti u pitanjima zaštite okoliša (64/08). http://www.propisi.hr/print.php?id=8163</p> <p>Rules on strictly protected species 2013 Pravilnik o strogo zaštićenim vrstama (OG 144/2013).</p>	<p>WWF Adria, website 2019 http://www.wwfadria.org/p/rojekti/sume/</p> <p>Global Forest Watch, Country profile 2019 https://www.globalforestwatch.org/dashboards/country/HRV</p> <p>Chatham House, Illegal Logging Indicators Country Report Card, 2019 https://www.illegal-logging.info/regions/Croatia</p> <p>FAO, FRA report 2015 http://www.fao.org/3/a-i4808e.pdf</p> <p>Local expert 2019</p>	<ul style="list-style-type: none"> • 126: Preserve biological species significant for the respective habitat types; not to introduce autochthonous and genetically modified organisms. • 127: Secure a permanent percentage of mature, old and dry (both standing and on the ground) trees, especially those with cavities • 128: Assure the appropriate preservation and monitoring of rare and endangered wild species • 129: Where site conditions allow, perform afforestation and reforestation with “close-to-nature” methods and with autochthonous tree species and in a mixture which represents natural development. The afforestation of non-forest areas should be done only where it does not jeopardize rare or endangered non-forest habitat types. <p>Croatia has a long history of implementing nature conservation in legislation. According to the Forest law, protected sites (and species) are managed according to the same set of laws and regulations as regular forests but with limitations listed in Forest Management plans (which is not always in place with private owners). The Law on environmental protection is the basic law in this context.</p> <p>Additional regulations are set by the Rules on the strictly protected species. Such rules are applicable to all locations where the strictly protected species can be found. State or private, or any forest classification, doesn't matter in this case.</p> <p>There are various forms of protection possible (see overview text and category 3 for all details):</p> <p><i>Protective forests.</i> In these forests forest management activities are limited and production of wood assortments is a result of silvicultural work. Management of protective forests is done by the forest owner in accordance with forest management plans. The organization and procedure of harvesting the wood and wood assortments from protective</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>https://narodne-novine.nn.hr/clanci/sluzbeni/2013_12_144_3086.html</p> <p>Legal Authority Ministry of Environment and Energy https://www.mzoip.hr/en/</p> <p>Legally required documents or records EU Habitats Directive, country reporting, Article 17 report to the EU (2007-2013) https://bd.eionet.europa.eu/activities/Reporting/Article_17/Reports_2013</p> <p>Other documents Natura 2000 Croatia website http://www.bioportal.hr/gis/Landing_page http://www.haop.hr/hr/baze-i-portali/ekoloska-mreza-natura-2000</p> <p>State Inspection service / Croatian Agency for Environment and Nature (HAOP)(Hrvatska agencija za okoliš i zaštitu prirode). Now part of MEPE. 2019 http://www.haop.hr <i>Annual reports:</i> http://www.haop.hr/hr/godisnja-izvjesca-o-pracenju-emisija-oneciscujucih-tvari-u-zrak-iz-nepokretnih-izvora-na-teritoriju</p>		<p>forests is the same as described in productive forests, but extra regulations about protection are to be complied with. Protective forests are in Croatia mostly defined by legal regulations and forest management plans.</p> <p><i>Special purpose forests.</i> As explained in the overview text there are 6 types of special purpose forest and under the 'protection' type there are 9 classes of protection. The class of 'strict reserves' forbids all economic activities, and in the class of 'national park' economic use of natural goods is prohibited. For forests and forest land in the area of the national park and strict reserve, separate management organisations are formed and in charge for adopting a Forest protection program which contains measures for their protection. In general, all strict reserves and national parks do not have forest management plans, nor is this required.</p> <p>In all other types and classes under special purpose forest other activities are allowed under the condition that they do not endanger or alter significant characteristics of the protected area, according to the forest management plans. Forest operations are thus done in accordance with forest management plans which set out the conditions for interventions in these areas, the required scope of forest growth and protection, possible degree of utilization and conditions for the management of the fauna.</p> <p>The more general definition of protected forests in Croatia refers to forest areas with special (additional) legislative regulation adding some additional restrictions, so that forest management significantly defers from non-protected forest areas. Legally, forests are classified as protection forests mostly where extreme site conditions are presented or where extraordinary environmental values are presented (habitats). For example activities are limited in action and time by allowing specific harvesting machinery (less impact) (source: Forest Law and Law on environmental protection).</p>

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	<p>Forest management plan of the republic of Croatia (FMAP) valid for the period 1.1.2016-31.12.2025. 2017 Šumskogospodarska Osnova Šumskogospodarskog područja Republike Hrvatske–vrijedi od 1.1.2016. do 31.12. 2025. Godine.</p> <p>https://poljoprivreda.gov.hr/istaknute-teme/sume-112/sumarstvo/sumskogospodarska-osnova-2016-2025/250</p>		<p>By joining the EU, the Republic of Croatia converted the ecological network to the Natura 2000 network. This now has more than 260 species and 70 habitats, covering about 37% of the land territory and 15% of the coastal sea, ranking Croatia at the top of Europe. All Natura 2000 forest areas can be found in the existing forest areas (source: Natura 2000 Croatia website).</p> <p><i>Strategic Environmental Impact Assessment in Natura 2000 sites.</i></p> <p>The Ministry of Agriculture has implemented a procedure for Strategic Environmental Impact Assessments in the Forest management plan for the Republic of Croatia for the period 2016-2025 (General FMAP). Such is needed in Natura 2000 sites. Croatia is still in the implementation stage with these Natura 2000 management plans, as can be expected because it is a lot of work to develop the system and implement it.</p> <p>The primary legal framework is set in the Environmental law (Official Gazette, No. 80/13, 153/13 and 78/15), article 66. Further details are arranged in the Regulation on strategic environmental assessment of strategies, plans and programmes on the environment (Official Gazette, No. 3/17) and additional detailed requirements and procedures are laid down in the Regulation on information and participation of the public and public concerned in environmental matters (Official Gazette, No. 64/08).</p> <p>Description of Risk</p> <ol style="list-style-type: none"> 1. No data about violations. Inspections results are not publically available. Following an informal message from Hrvatske šume ltd an estimation is that illegal logging amounts up to 1% of the annual allowable cut. This is the total illegal cutting and includes the extraction of firewood. Such can also be related to not following the harvesting regulations. This is a substantial claim but cannot be verified (source: local expert).

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			<p>2. Natura 2000 network. Although the network is implemented (no Curia court cases against Croatia) the first official report still has been to be submitted. There is thus no way to check if protected sites and species are sufficiently protected in the field. Natura 2000 FMP's are only made in a few (2) locations (source: Natura 2000 websites). Nevertheless, all Natura 2000 forest areas can be found in the existing forest areas, thus risk 1 and 3 also apply.</p> <p>3. About 30% of the private forest owners do not yet have an FMP, although Croatia aims to develop the remaining 30% within a few years (Source: FMAP, general FMP). In principle there is thus a chance that, on these 30%, things can go wrong with species and site protection. Because when harvesting will take place it will not be based on planning. However, this is solved by the government by the system of 'Decisions for the removal of trees'. Private owners can request a harvesting permit and the ministry assesses the regular Forest laws and regulations and send a registered expert to assess the situation in the field. This system is in place and working and thus the 'management' part seems to be in order (Source: Local expert). For more information about harvesting permits see indicator 1.4.</p> <p>What other sources say International sources like FAO (global forest resources assessment), Chatham House (Illegal Logging Portal), Global Forest Watch and Forest Europe are not reporting anything with regards to this indicator. One older report by the UNECE (Republic of Croatia illegal logging and trade of illegally-derived forest products 2004), does not report anything significant and is too old anyway. There are no other official international reports or international messages about site & species protection problems.</p> <p>There are no European court cases filed against Croatia that handle about this topic (CURIA 2019).</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
			<p>Almost all state forests in Croatia have an FSC certificate which states that forests are managed according to strict ecological, social and economic standards which include conservation and enhancement of biodiversity. Regular renewal of FSC certificate is also a confirmation that all the required standards have been met in the previous period. See for all data about certification indicator 1.3.</p> <p>The total amount of forest in Croatia, and the growing stock (in m3), is growing every year, over the last decades. The current stock stands at 167 m3/ha. This means a very healthy forest in Europe. In the period 2006 to 2016 the growing stock increased by 5 %. The annual increment is 5,87 m3/ha. There is no large scale deforestation taking place as this would be observed in mapping and forest management planning and reduced stocks/ha. This confirms that the forests stay as they are (source: FMAP, various annual reports, see left column, and for more details see indicator 1.3).</p> <p>The CPI index for Croatia in 2019 stands at 47 (where 1 is most corrupt). According to FSC directive (FSC-DIR-40-005) we have to take extra care when the Corruption Perception Index (CPI) for the given country is equal to or below 50. This is the case for Croatia and on top of that there is a downwards trend for the last year which is not good news. It means that in general we have to be careful with relying on governmental sources only and we have to look at other, independent, sources for confirmations of data and statements where possible.</p> <p>There is some overlap with the assessment of indicators 3.1 and 3.3. The main conclusion in both indicators is: <i>'Almost all state forests managed by CF Ltd is FSC certified (96,6% of all state owned forests), which is a guarantee by itself because it means that almost 76% of the forest in Croatia is well managed.'</i></p>

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			<p><i>However, a part of the private owners (30%) does not have Forest Management Plans in place. Here we should take the pre-cautionary approach because there is no strict guarantee that HCV's are not harmed'.</i></p> <p>Risk Conclusion Low risk for state forests and private forests with Forest Management Plans. 'Low risk' threshold (1) applies: Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the authorities and/or by the relevant entities.</p> <p>Specified risk for private forests without Forest Management Plans. 'Specified risk' threshold (2) applies: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.</p>
1.10 Environmental requirements	<p>Applicable laws and regulations Forest law Zakon o šumama 2019 (OG 140/05, 82/06, 129/08, 80/10, 124/10, 25/12, 68/12, 148/13, 94/14, 68/18, 14/19) https://narodne-novine.nn.hr/clanci/sluzbeni/2018_07_68_1392.html</p> <p>Law on environmental protection 2018 Zakon o zaštiti okoliša (1994, 2007, OG 78/2015, 12/18). https://www.zakon.hr/z/403/Zakon-o-za%C5%A1titi-prirode</p>	<p>CURIA, European court cases against Croatia, 2019</p> <p>http://curia.europa.eu/juris/recherche.jsf?oqp=&for=&mat=or&jge=&td=%3BALL&jur=C%2CT%2CF&dates=&pcs=Oor&lg=&pro=&nat=or&cit=none%252C%252CCJ%252CR%252C2008E%252C%252C%252C%252C%252C%252C%252C%252Ctrue%252Cfalse%25</p>	<p>Overview of Legal Requirements Besides the general Forest law, the Law on environment protection is making forest owners responsible for landfills and pollution in their forests. These acts are listing articles about how to protect nature. They explain how to organize nature conservation in the field (Forest management plans) and at institutional level (who does what). This is not only about forestry, but also about wetlands, open waters etc. There are also articles that explain what to do in case of calamities with chemicals, how to use chemicals and pesticides (or not) and what is allowed or not. The Forest law also explains what to do in case of stand damage.</p> <p>General harvesting regulations are in place and enforced since many decades throughout the 'Forest law'. The Rules on forest working types, minimal conditions for their implementation and work which forest owners can perform individually and the Rules on tree marking, wood assortments marking, trade document and forest order explain how to</p>

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	<p>Rules on forest working types, minimal conditions for their implementation and work which forest owners can perform individually 2018 Pravilnik o vrsti šumarskih radova, minimalnim uvjetima za njihovo izvođenje te radovima koje šumoposjednici mogu izvoditi samostalno (OG 16/15 i 30/2018) https://narodne-novine.nn.hr/clanci/sluzbeni/2018_03_30_617.html</p> <p>Rules on tree marking, wood assortments marking, trade document and forest order 2015 Pravilnik o doznaci stabala, obilježavanju drvnih sortimenata, popratnici i šumskom redu (NN 17/2015) https://narodne-novine.nn.hr/clanci/sluzbeni/2015_02_17_332.html</p> <p>Act on forest reproductive material 2014 Zakon o šumskom reprodukcijsko materijalu (OG 75/09, 61/11, 56/13, 14/14). https://www.zakon.hr/z/597/Zakon-o-%C5%A1umskom-reprodukcijskom-materijalu</p> <p>Decree on protected plant species 2013 Pravilnik o zaštićenim biljnim vrstama (OG 144/13).</p>	<p>2Cfalse&language=hr&avg=&cid=6486960</p> <p>Global Forest Watch, Country profile 2019 https://www.globalforestwatch.org/dashboards/country/HRV</p> <p>Chatham House, Illegal Logging Indicators Country Report Card, 2019 https://www.illegal-logging.info/regions/Croatia</p> <p>FAO, global forest resources assessment (FRA) report for Croatia, 2010 http://www.fao.org/3/al485E/al485e.pdf</p> <p>FAO, FRA report 2015 http://www.fao.org/3/a-i4808e.pdf</p> <p>WWF Adria, 2019 http://www.wwfadria.org/projekti/sume/</p>	<p>mark the trees and how to harvest a tree (directional felling etc). It also explains what to do with waste material, how to stack the timber on the roadside and some minor topics. The 3 laws above combined also explain the legal requirements for harvesting techniques and technology, including selective cutting, clear felling, transport of timber from the felling site, seasonal limitations, the size of felling areas, minimum age and/or diameter for felling activities, and elements that shall be preserved during felling, establishment of skidding or hauling trails, road construction, drainage systems and bridges besides the normal planning and monitoring of harvesting activities (as explained in earlier indicators).</p> <p>Forest activities in protected areas are limited in action and time by allowing, for example, specific harvesting machinery (less impact). In National parks forest operations are not allowed (source: Law on forest and Law on environmental protection).</p> <p>The Forest law articles about reproductive material is striving to secure production, trade and import of adopted and high quality forest reproductive materials for sustainable and optimal management of forest ecosystems. Related to this is the Decree on protected plant species.</p> <p>The Law on hunting can put some restrictions to the management when the forests are part of hunting areas. For example when there are hunting seasons for certain animals there cannot be any harvesting.</p> <p>The Rules on fungi protection and the Decree on protected plant species make sure that mushroom and truffle picking are regulated without damage to the environment. Picking wild forest species, such as forest fruits and mushrooms are regulated by the Law on environmental protection, and the Ordinance on the collection of native wild species. In strictly protected areas (strict reserves and natural parks), picking of wild</p>

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	<p>https://narodne-novine.nn.hr/clanci/sluzbeni/2013_12_144_3086.html</p> <p>Ordinance on the collection of native wild species 2017 Pravilnik o sakupljanju zavičajnih divljih vrsta, (NN 114/2017). http://www.poslovni-savjetnik.com/propisi/pravilnik-o-sakupljanju-zavicajnih-divljih-vrsta-vazeci-tekst-nn-br-1142017</p> <p>Law on Hunting 2018 Zakon o lovstvu (OG 140/05, 75/09, 153/09, 14/14, 99/18); https://www.zakon.hr/z/422/Zakon-o-lovstvu</p> <p>Rules on fungi protection 2002 Pravilnik o zaštiti gljiva (OG 34/2002) https://narodne-novine.nn.hr/clanci/sluzbeni/2002_04_34_739.html</p> <p>Law on water 2019 Zakon o vodama (NN 66/19). https://www.zakon.hr/z/124/Zakon-o-vodama</p> <p>Law on agricultural land 2018 Zakon o poljoprivrednom zemljištu (2013, 2015, 2018); (OG 39/13, 48/15, 20/18). https://www.zakon.hr/z/133/Zakon-o-poljoprivrednom-zemlji%C5%A1tu</p>	<p>NGO Zelena akcija, 2019 https://zelena-akcija.hr/</p> <p>NGO Zeleni odred, 2019 http://veteranivodra.hr/akti-vnosti/</p> <p>Forest Europe, Country report, 2015 http://foresteurope.org/sta-te-europes-forests-2015-report/#1476295965372-d3bb1dd0-e9a0</p> <p>Local expert 2019</p>	<p>forest species is prohibited, while in special reserves it is often prohibited as a commercial collection.</p> <p>The Ordinance provides a list of native wildlife species for which, when collected commercially, a permission is required. Such permission prescribes the general measures of management and protection of species and species groups, defines in detail the content of the application for obtaining permits for the commercial use of the native wildlife species concerned, as well as the conditions for obtaining the permit.</p> <p>The Law on water considers forests which are placed close and along the water bodies as public water property, and defines them as protective forests. It means that such forest are classified as protective forests, and as such has its own protection measures. In these forests forest management activities are limited and production of wood assortments is a result of silvicultural work. Management of protective forests is done by the forest owner in accordance with forest management plans. The organization and procedure of harvesting the wood and wood assortments from protective forests is the same as described in productive forests above, but extra regulations about protection are to be complied with. See also for more detailed information indicator 3.4 (section about 'Forests acting as clean drinking water catchments and protection of water quality').</p> <p>The Law on agricultural land (Article 3) considers the non-overgrown or degraded forest land as agricultural land.</p> <p>Due to the fact that a large number of areas under mines (remaining from the war) are part of the forests and hence forest land and forest management on these areas is not possible. During the process of clearing, a large number of restrictions can be placed concerning forest management and its subsequent regeneration. Such is all explained in the Law on mine action.</p>

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	<p>Law on mine action 2015 Zakon o protuminskom djelovanju. (OG 110/15) https://www.zakon.hr/z/834/Zakon-o-protuminskom-djelovanju</p> <p>Law on forest fires prevention 2010 Zakon o zaštiti od požara (NN 92/10) https://www.zakon.hr/z/349/Zakon-o-za%C5%A1titi-od-po%C5%BEara</p> <p>Rules on working conditions 2009 Hrvatske šume, Pravilnik o zaštiti na radu (75/09) https://www.hrsume.hr/images/stories/vijesti2017/interni_pravilnik_o_znr_hs_2009.pdf</p> <p>Law on working protection 2018 Zakon o zaštiti na radu (NN 71/14, 118/14, 154/14 , 94/18, 96/18) https://www.zakon.hr/z/167/Zakon-o-za%C5%A1titi-na-radu</p> <p>Environmental law 2013 Zakon o zaštiti okoliša (OG 80/13 , 153/13 , 78/15 , 12/18 , 118/18). https://www.zakon.hr/z/194/Zakon-o-za%C5%A1titi-okoli%C5%A1a</p> <p>Regulation on strategic environmental assessment of strategies, plans and programmes on the environment 2017 Uredbu o strateškoj procjeni utjecaja strategije, plana i programa na okoliš (3/17). http://www.propisi.hr/print.php?id=8162.</p>		<p>The Law on forest fires prevention makes sure that forest guards and fire response systems are in place (mandatory). Various actions have been taken in fire prevention: forest fire risks are calculated continuously, existing forest and fire roads have been cleared and new detection systems installed throughout the country. See also indicator 3.4 for more information.</p> <p>The Rules on working conditions and the Law on working protection explain how to deal with chemicals in relation to a working environment. These documents focus on protection of forest workers and what to do in case of accidents with machinery or chemicals. The actual use, or better, the prevention of use, of pesticides and other chemicals is prescribed in the Environmental law. In principle nothing is allowed, only in case of real emergencies.</p> <p>Corresponding environmental requirements are based on all laws above.</p> <p><i>Strategic Environmental Impact Assessment in Natura 2000 sites.</i></p> <p>The Ministry of Agriculture has implemented a procedure for Strategic Environmental Impact Assessments in the Forest management plan for the Republic of Croatia for the period 2016-2025 (General FMAP). Such is needed in Natura 2000 sites.</p> <p>The primary legal framework is set in the Environmental law (Official Gazette, No. 80/13, 153/13 and 78/15), article 66. Further details are arranged in the Regulation on strategic environmental assessment of strategies, plans and programmes on the environment (Official Gazette, No. 3/17) and additional detailed requirements and procedures are laid down in the the Regulation on information and participation of the public and public concerned in environmental matters (Official Gazette, No. 64/08).</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Regulation on information and participation of the public and public concerned in environmental matters 2008 Uredbu o informiranju i sudjelovanju javnosti i zainteresirane javnosti u pitanjima zaštite okoliša (64/08). http://www.propisi.hr/print.php?id=8163</p> <p>Law on Croatian Chamber of Forestry and Wood Technology Engineers 2006 Zakon o Hrvatskoj komori inženjera šumarstva i drvne tehnologije (NN 22/06). https://narodne-novine.nn.hr/clanci/sluzbeni/2006_02_22_528.html</p> <p><i>Including the 'Ordinance on issuing, renewal and revocation of the license for forestry, game management and wood processing operations, Croatian Chamber of Forest and Wood Technology Engineers'.</i></p> <p>Legal Authority Ministry of Environment and Energy https://www.mzoip.hr/en/</p> <p>Ministry of Agriculture https://poljoprivreda.gov.hr/</p> <p>Legally required documents or records Game management plans are not publicly available</p>		<p>According to the various laws above, when based in a Natura2000 site, a forest owner shall:</p> <ul style="list-style-type: none"> • conduct forest management in accordance with the certification procedure • during the final felling leave small areas uncleared • preserve open sites and forest edges • ensure the extension of the cutting age of autochthonous species • avoid use of chemical pesticides • not afforested with alien species • during harvest leave the required number of old and rotten trees • make afforestation with autochthonous species <p>Regulations based on the Ecological network There are also some additional measures set in the various regulations about the Ecological network (Natura 2000). See indicator 1.9 for more information and the sources. But these laws have resulted in extra topics in the FMP's (examples given by topic numbers in the FMP):</p> <ul style="list-style-type: none"> • 125: Avoid usage of chemical agents and control agents for the plant protection; not to use genetically modified organisms • 126: Preserve biological species significant for the respective habitat types; not to introduce autochthonous and genetically modified organisms. <p>Forest workers For forest workers and licensed engineers, experts and contractors there are 2 relevant documents: a) Law on Croatian chamber of forestry and wood processing engineers and b) the Ordinance on issuing, renewal and revocation of the license for forestry, game management and wood processing operations, Croatian chamber of forest and wood technology engineers. These documents also state what is required to become a licensed expert. See for all details indicator 1.8.</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Annual reports Inspection service / Croatian Agency for Environment and Nature (HAOP)(Hrvatska agencija za okoliš I zaštitu prirode). Now part of MEPE. http://www.haop.hr Annual reports: http://www.haop.hr/hr/godisnja-izvjesca-o-pracenju-emisija-oneciscujucih-tvari-u-zrak-iz-nepokretnih-izvora-na-teritoriju</p>		<p>Description of Risk</p> <ol style="list-style-type: none"> 1. The main environmental problems are a result of forest operations. One of the most common is forest soil damage and building skidding roads with no permit. There is no evidence about the area affected with this issue. In state forest there are no skidding roads build without permission. In private forest in some cases owners create temporary skidding paths (tractor extraction road) for the purpose of exploitation. (source: local expert). Annual report from the Inspectorate for Environment protection includes environmental damages. The report is topic related regarding the implementation of different laws (like environment, waste management, air and light pollution, nature protection). But no further details are given for each offence. Nevertheless, cases seem to be minimal, and hardly forest related. 2. Natura 2000 network. Although the network is implemented (no Curia court cases against Croatia) the first official report still has to be submitted. There is thus no way to check if protected sites and species are sufficiently protected against environmental damage. Natura 2000 FMP's are only made in a few (2) locations, but such can be expected as it is a lot of work to develop (source: Natura 2000 websites). All Natura 2000 forest areas can be found in the existing forest areas, thus risk 1 also applies. <p>What other sources say International sources like FAO (global forest resources assessment), Chatham House (Illegal Logging Portal), Global Forest Watch and Forest Europe are not reporting anything with regards to this indicator. There are no other official international reports or international messages about substantial Environmental problems inside Croatia.</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
			<p>There are no European court cases filed against Croatia that handle about this topic (CURIA 2019). This also means Natura2000 implementation is on schedule.</p> <p>The local sources WWF Adria, NGO Zelena akcija and NGO Zeleni odred are following forest activities, raising awareness about the forest protection and fighting against illegal logging. But they are not reporting shortfalls with regards to this topic.</p> <p>The consulted local expert has declared this indicator as low risk.</p> <p>Risk Conclusion</p> <p>Although environmental laws are the same for all landowners (state and private) there is less control with private forest owners that do not have an FMP. Without an FMP there is no way to guarantee that there is no damage done as many environmental issues are prescribed and regulated throughout the FMP.</p> <p>Here we should take the precautionary approach because there is no strict guarantee that environmental legal requirements are enforced in these cases.</p> <p>Low risk for state forests and private forests with Forest Management Plans. 'Low risk' threshold (1) applies: Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the authorities and/or by the relevant entities.</p> <p>Specified risk for private forests without Forest Management Plans. 'Specified risk' threshold (2) applies: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
1.11 Health and safety	<p>Applicable laws and regulations Law on health and work safety 2018 Zakon o zaštiti na radu (NN 71/14, 118/14, 154/14 , 94/18, 96/18) https://www.zakon.hr/z/167/Zakon-o-za%C5%A1titi-na-radu</p> <p>Rules on health and work safety in forestry 1986 Pravilnik o zaštiti na radu u šumarstvu (OG 10/86) http://www.zagrebinspekt.hr/propisi/Propisi_ZN_R/knjiga_CD1/Pravilnik_sumar.htm</p> <p>Including the:</p> <p>Decision on minimal qualifications and equipment for forest workers (not published online). Odluka o minimalnim kvalifikacijama i opremi za šumske radnike.</p> <p>Forest law 2019 Zakon o šumama (OG 140/05, 82/06, 129/08, 80/10, 124/10, 25/12, 68/12, 148/13, 94/14, 68/18, 14/19) https://narodne-novine.nn.hr/clanci/sluzbeni/2018_07_68_139_2.html</p> <p>Law on Croatian chamber of forestry and wood technology engineers 2006 Zakon o Hrvatskoj komori inženjera šumarstva i drvne tehnologije (22/06).</p>	<p>ILO, Occupational Accidents ILO 2019 https://www.ilo.org/moscow/areas-of-work/occupational-safety-and-health/WCMS_249278/lang-en/index.htm</p> <p>Hrvatske šume d.o.o., Poslovno izvješće 2015 god. Annual Business Report CF Ltd. 2015 https://www.hrsume.hr/index.php/hr/godisnja-poslovna-izvjesca</p> <p>Paper Šumarski list nr 134. Landekić, M. 2010 https://hrcak.srce.hr/index.php?id_clanak_jezik=94071&show=clanak,</p> <p>Scielo, Occupational Accidents Footprint , 2015. https://www.researchgate.net/publication/283699193_Occupational_safety_in</p>	<p>Overview of Legal Requirements In Croatia, the health and safety is regulated by the Law on health and work safety 2018. All business entities and self-employed people have to follow this regulation.</p> <p>Business entities and self-employed people in forestry also have to follow the applicable Rules on health and work safety in forestry. In this law many things are explained for example: implementation of safe felling and transport practices, establishment of protection zones around harvesting sites, safety requirements for machinery used, and legally required safety requirements in relation to chemical usage.</p> <p>Registered Forest operator For forest workers and licensed engineers, experts and contractor there are 2 relevant documents: a) Law on Croatian chamber of forestry and wood processing engineers and b) the Ordinance on issuing, renewal and revocation of the license for forestry, game management and wood processing operations, Croatian chamber of forest and wood technology engineers. These documents also state what is required to become a licensed expert/ registered forest operators. See for all details indicator 1.8. Registered forest operators must follow also the Decision on minimal qualifications and equipment for forest workers. They must have a National vocational qualification (a practical training in the field) and wear personal safety equipment. The document also explains what type of safety equipment is needed, with each type of work.</p> <p>Firewood processing According to the Forest law, non-professionals (the local population), who are trained in harvesting operations (safe work with a chainsaw), are allowed to buy and process for their own purposes up to 30 m3 of firewood per year (self-processing), with the permission and under the supervision</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>https://narodne-novine.nn.hr/clanci/sluzbeni/2006_02_22_528.html</p> <p><i>Including the 'Ordinance on issuing, renewal and revocation of the license for forestry, game management and wood processing operations, Croatian Chamber of Forest and Wood Technology Engineers'.</i></p> <p>Legal Authority Ministry of Agriculture, https://poljoprivreda.gov.hr/</p> <p>Ministry of Labor and Pension system- https://www.mrms.hr/</p> <p>Labour Inspectorate http://www.mrms.hr/ministarstvo-rada-i-mirovinskoga-sustava/inspektorat-rada/</p> <p>Legally required documents or records National vocational qualification for registered operators.</p> <p>Other documents Business report on Croatian forests https://www.hrsume.hr/index.php/en/annual-statements</p> <p>Statistical Yearbook of the Republic of Croatia 2018, Croatian Bureau of Statistics. (Statistički</p>	<p>dicators for forest operations sawmilling and wood-based panels manufacture An international benchmarking</p> <p>Croatian Journal of Forest Engineering, Matija Landekić et al, Current State and Improvement Potential of Forestry Workers Training in Croatia, 2018</p> <p>https://hrcak.srce.hr/index.php?show=clanak&id_clanak_jezik=300559</p> <p>Šumarski list 141, Landekić, M., Martinić, I., Bakarić, M., Ricart, R.M., Šporčić, M., 2017: Vocational Training of Workers in the Forestry Sector – the Situation in Croatia and Trends in Europe. 2017</p>	<p>of the person who manages these forests. This only counts for State forests, in private forests the private owners can do this without supervision. It means that natural persons (not companies) can work in state forest to harvest max 30 m3 of firewood if they are trained in harvesting operations. They can also work in their own private forests. This is not for commercial purposes and cannot be sold as such. Thus, commercial firewood from state can never enter the market (see indicator 1.4 for more details).</p> <p>In state forests, the above mentioned self-processing works reach up to 650 000 m3 per year (Annual Business Report CF Ltd. 2015). Due to the allowed volume of self-processing (30 m3), there are thousands of potential actors who need to be trained in safe work and appropriate use of forestry machines, all according to verified training programs.</p> <p>In the regular harvesting with state forests, forest inspectors are supervising forest contractors in terms of professional competence and health and safety requirements. This is well regulated, and following H&S laws and regulations is always parts of the contracts and thus checked in the field.</p> <p>In private forest the situation is more unclear. And no data is available. Due to the allowed volume of self-processing (30 m3) many private forest owners are harvesting this firewood themselves and there is not much, if any, supervision taken place. Deficiency of legal provisions gives an unclear picture of the level and type of qualifications that must be met by non-professionals, as well as of the qualifications of the supervisory staff when the harvesting works are carried out in private forests (Landekić et al. 2017) Private forest owners work on their own responsibility. Nevertheless, they have to follow the same laws and regulations and nobody is controlling this.</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination																				
	<p>ljetopis Republike Hrvatske 2018, Državni zavod za statistiku Republike Hrvatsk) 2019. https://www.dzs.hr/Hrv_Eng/ljetopis/2018/sljh2018.pdf</p> <p>Annual report Labour Inspectorate (2017 and 2018) http://www.mrms.hr/wp-content/uploads/2014/03/Izvje%C5%A1%C4%87e-o-radu-Inspektorata-rada-u-2017.-s-prilozima.pdf</p> <p>http://www.mrms.hr/wp-content/uploads/2014/03/Izvješće-o-radu-Inspektorata-rada-u-2018.-s-prilozima.pdf</p>	<p>https://hrcak.srce.hr/index.php?show=clanak&id_clanak_jezik=274863</p>	<p>Description of Risk</p> <p>1. Deficiency of legal provisions gives an unclear picture of the level and type of qualifications that must be met by non-professionals, as well as of the qualifications of the supervisory staff when the harvesting works are carried out in private forests (Landekić et al. 2017).</p> <p>2. Over 2009, as example, Croatian Forests Ltd. shows a very high index of 29,40 injuries per 1 000 employees (state forests only), which makes it the highest index in relation to other economic sectors. Simultaneously, the collective activity farming, forestry and fishery is located at the rear with 7,95 injuries per 1 000 employees (state and private together). Comparing officially recognized work related injuries in 2009, the state forestry company manifests the highest index of injuries per 1000 employees, where the index is approximately 4,6 times higher than the index in the manufacturing industry which is 0,45 (Landekić, 2010).</p> <p>According to the more recent annual reports of the Labour inspectorate the following figures about injuries and fatal accidents per year can be collected from the forest and logging sector (state and private forest owners together, total cases per year):</p> <table border="1" data-bbox="1236 906 2116 1120"> <thead> <tr> <th></th> <th>2015</th> <th>2016</th> <th>2017</th> <th>2018</th> </tr> </thead> <tbody> <tr> <td>soft injuries</td> <td>3</td> <td>4</td> <td>3</td> <td>1</td> </tr> <tr> <td>hard injuries</td> <td>60</td> <td>69</td> <td>73</td> <td>67</td> </tr> <tr> <td>death</td> <td>3</td> <td>6</td> <td>4</td> <td>5</td> </tr> </tbody> </table> <p>In average we can calculate 4,5 fatal accidents per year.</p> <p>In literature these numbers are usually calculated by the number of fatal accidents/million m3 harvested in the country.</p>		2015	2016	2017	2018	soft injuries	3	4	3	1	hard injuries	60	69	73	67	death	3	6	4	5
	2015	2016	2017	2018																			
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			<p>If we calculate 4,5 / 5,3 million m3 harvested (2017 figure, source: Statistical Yearbook 2018) = 0,84 fatal/million m3.</p> <p>To compare here are some figures:</p> <table border="1" data-bbox="1234 363 1765 922"> <thead> <tr> <th>COUNTRY</th> <th>Fatal Cases/Million M3 (2010–2012 Average)</th> </tr> </thead> <tbody> <tr><td>Germany</td><td>0</td></tr> <tr><td>Belgium</td><td>0</td></tr> <tr><td>Finland</td><td>0.0064</td></tr> <tr><td>Australia</td><td>0.01</td></tr> <tr><td>Sweden</td><td>0.04</td></tr> <tr><td>New Zealand</td><td>0.16</td></tr> <tr><td>Canada (Province of BC)</td><td>0.17</td></tr> <tr><td>Spain</td><td>0.18</td></tr> <tr><td>Chile</td><td>0.21</td></tr> <tr><td>USA</td><td>0.22</td></tr> <tr><td>United Kingdom</td><td>0.23</td></tr> <tr><td>Austria</td><td>0.30</td></tr> <tr><td>Italy</td><td>2.05</td></tr> </tbody> </table> <p>(Source: Occupational Accidents Footprint in forest sector– Scielo (see left column)).</p> <p>The figure for Croatia is a bit higher than other countries, this is partly caused by the fact that many broadleaves are harvested. Broadleaves, when compared with conifers, are usually harvested by chainsaw, and not by bigger harvesting machines. Working with chainsaws is more dangerous than harvesters and thus a higher number of fatalities can be expected in a country when compared to countries like Sweden where almost everything is conifers. Nevertheless, in a country like Hungary (with much more broadleaves harvested) the figure is only 0,61. Thus Croatia is</p>	COUNTRY	Fatal Cases/Million M3 (2010–2012 Average)	Germany	0	Belgium	0	Finland	0.0064	Australia	0.01	Sweden	0.04	New Zealand	0.16	Canada (Province of BC)	0.17	Spain	0.18	Chile	0.21	USA	0.22	United Kingdom	0.23	Austria	0.30	Italy	2.05
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Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
			<p>a bit higher.but it proofs law enforcement is in place and things are under control.</p> <p>The more general ILO reports about Occupational Accidents do not state any major H&S problem in the country. The 2015 Occupational Accidents Footprint – report by Scielo does not state anything either.</p> <p>What other sources say Regular and systematic control of registered forest workers is resulting in better equipment and qualifications in general (source: local expert).</p> <p>Law enforcement. There are no reports published about law enforcement and found cases of inconsistencies.</p> <p>Risk Conclusion Specified risk is considered for private forests because private owners often manage their own forests without safety requirements. Regulations are in place but it is unclear to what point private forest owners in their own forest are following the laws.</p> <p>Specified risk' threshold (2) is met: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.</p> <p>In state forest (mostly FSC certified anyway) this is much better regulated and therefore is considered as low risk. 'Low risk' threshold (1) is met: Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the authorities and/or by the relevant entities.</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
1.12 Legal employment	<p>Applicable laws and regulations</p> <p>Employment law 2017 Zakon o radu OG 127/17 https://www.zakon.hr/z/307/Zakon-o-radu</p> <p>Law on representativeness of workers and trade unions 2015 Zakon o reprezentativnosti radnika i sindikata (OG 26/15) https://www.zakon.hr/z/740/Zakon-o-reprezentativnosti-udruga-poslodavaca-i-sindikata</p> <p>Minimum wage act 2018 Uredba o minimalnoj plaći (OG 109/18) https://narodne-novine.nn.hr/clanci/sluzbeni/2018_12_109_20_93.html</p> <p>Law on state inspectorate 2018 Zakon o državnom inspektoratu (OG 115/18) https://www.zakon.hr/z/298/Zakon-o-dr%C5%BEavnom-inspektoratu</p> <p>Forest law 2019 Zakon o šumama (OG 140/05, 82/06, 129/08, 80/10, 124/10, 25/12, 68/12, 148/13, 94/14, 68/18, 14/19) https://narodne-novine.nn.hr/clanci/sluzbeni/2018_07_68_139_2.html</p>	<p>ILO. Website Croatia with signed conventions, 2019 https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11110:0::NO::P11110_COUNTRY_ID:102700</p> <p>Save the Children, annual report, 2016 https://www.savethechildren.org/content/dam/usa/reports/advocacy/highlights-2016-report.PDF</p> <p>Human Rights Watch, website 2018 https://www.hrw.org/world-report/2019/country-chapters/croatia</p> <p>Local expert 2019</p>	<p>Overview of Legal Requirements</p> <p>Croatia has ratified and/or been a signatory to a number of important international conventions and regulations related to employment and workers' rights; child labour, slavery, forced and bonded labour; trafficking; migrant labour; etc. Information is available through the ILO website. Croatia has ratified 60 ILO Conventions and 1 Protocol, of which Croatia has ratified 8 of 8 ILO's Fundamental Conventions. See also CNRA indicator 2.2. for more information.</p> <p>Croatia implemented national legislation covering these issues, many of which are relevant to the forest and timber processing industries. The Employment law is the principal piece of legislation and covers 235 articles and a range of topics. The law explains the rules and regulations about child labour (minimum age), training and education, type of contracts and further rights for both employer and employee.</p> <p>The Law on representativeness of workers and trade unions define election of trade union representatives, and the fact that employees can join such trade unions.</p> <p>Minimum wages are set in the Minimum wage act, defined by the Government.</p> <p>Everything related to labour inspections is arranged in the new Law on state inspectorate which started its implementation on April 1st, 2019, where inspections from different ministries will be joined together in one administration body according to the Law on state inspectorate in 2018. There are no publically available reports by the government about State inspection reports in the forestry sector.</p> <p>Work in the forests can be done, as the Forest act states in article 50, only by the registered and licensed contractors or engineers. See indicator 1.8 for a detailed explanation about registered and licensed contractors or</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Rules on forest working types, minimal conditions for their implementation and work which forest owners can perform individually 2018 Pravilnik o vrsti šumarskih radova, minimalnim uvjetima za njihovo izvođenje te radovima koje šumoposjednici mogu izvoditi samostalno (OG 16/15 i 30/2018) https://narodne-novine.nn.hr/clanci/sluzbeni/2018_03_30_617.html</p> <p>Legal Authority Ministry of Agriculture, https://poljoprivreda.gov.hr/</p> <p>Inspectorate of the Republic of Croatia Ministry of Labor, and pension system https://www.mrms.hr/</p> <p>Legally required documents or records Individual workers employment contracts and records of payments.</p>		<p>engineers. This is excluding the firewood harvesting by private people as explained in indicator 1.11. These private people do not need a labour contract and thus there is no need to assess them in this indicator.</p> <p>Licensed forest operators must follow the Rules on forest working types, minimal conditions for their implementation and work which forest owners can perform individually.</p> <p>Description of Risk</p> <p>1. Help between neighbours in small scale private forests is common and traditional. As a result of this it is difficult to find reported cases of villagers actually working for money in the forests (and thus becoming illegal workers, without proper paperwork or labour contract) (source: local expert). Such will not happen in State Forests because you can only work with State when you are a registered and licensed contractor or engineers and working on a contract (except for the private people harvesting firewood, but these people do not need to have a labour contract). As almost all State Forests are FSC certified we can assume that things are indeed organized as intended.</p> <p>2. Forest operators with regular activity usually issue bills for the work done. Small operators can be found to work with no issued bill (source: local expert).</p> <p>What other sources say No other information is publically available to check trends about labour in the forestry sector.</p> <p>Accidents with people that are working illegally are not covered by any insurance or governmental funds.</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
			<p>There is no public available information, or international sources, that present more information about illegal workers in the forest sector. ILO, Save the Children and Human Rights Watch do not state anything in their publications.</p> <p>CNRA indicator 2.2. declares a low risk, but is mainly looking if labour rights are respected including rights as specified in ILO Fundamental Principles and Rights at work. With these topics there is no problem in Croatia.</p> <p>This is not the same as this indicator but draws a more general picture towards employment in Croatia.</p> <p>Risk Conclusion Private forests It cannot be checked if the labour conditions (no employment contracts available because both parties involved do not see the need to draft one) with people working in the private forest are always according to the regulations. This is especially unclear for non-registered forest operators that are working in private forests lands or neighbours helping each other. Non-registered forest operators are in fact often private forest owners that are doing business as natural persons. There is not enough evidence publically available to draw a clear conclusion. Therefore, we need to apply the precautionary approach and issue a specified risk for private forests.</p> <p>Specified risk' threshold (2) is met: Identified laws are not upheld consistently by all entities and/or are often ignored, and/or are not enforced by relevant authorities.</p> <p>State forests State and municipal forests are being assisted by registered operators, thus constituting a low risk.</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
			<p>'Low risk' threshold (1) is met: Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the authorities and/or by the relevant entities.</p>
Third parties' rights			
<p>1.13 Customary rights</p>	<p>Applicable laws and regulations</p> <p>Croatia's Constitution of 1991 with Amendments through 2010 (page 4). https://www.constituteproject.org/constitution/Croatia_2010.pdf?lang=en</p> <p>Forest law 2019 Zakon o šumama (OG 140/05, 82/06, 129/08, 80/10, 124/10, 25/12, 68/12, 148/13, 94/14, 68/18, 14/19) Specially articles 21 and 38. https://narodne-novine.nn.hr/clanci/sluzbeni/2018_07_68_139_2.html</p> <p>Law on hunting 2018 Zakon o lovstvu (OG 140/05, 75/09, 153/09, 14/14, 99/18); https://www.zakon.hr/z/422/Zakon-o-lovstvu</p> <p>Legal Authority Ministry of Agriculture, https://poljoprivreda.gov.hr/</p> <p>Legally required documents or records N/A</p>	<p>The Indigenous World, 2019 https://www.iwgia.org/en/indigenous-world</p> <p>OHCHR, United Nations Special Rapporteur on the rights of indigenous peoples, 2018 https://www.ohchr.org/EN/Issues/IPeoples/SRIndigenousPeoples/Pages/CountryReports.aspx</p> <p>ILO, website Croatia with signed conventions, 2019 https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11110:0::NO::P11110_COUNTRY_ID:102700</p> <p>Human Rights Watch, website, 2018</p>	<p>Overview of Legal Requirements</p> <p>There are no Indigenous and Traditional Peoples as per definition of ILO (or other international sources like OHCHR, United Nations Forum on Indigenous Issues, or Human Rights Watch) in Croatia. In Europe, the only IP or TP are the Saami of northern Europe, and they are not placed in Croatia. There are many national minorities indicated in the Constitution of Republic of Croatia, but these are not considered IP or TP in the country legislation (Serbs, Czechs, Slovaks, Italians, Hungarians, Jews, Germans, Austrians, Ukrainians, Rusyns, Bosniaks, Slovenians, Montenegrins, Macedonians, Russians, Bulgarians, Poles, Roma, Romanians, Turks, Vlachs, Albanians and others). International sources (see above) and the local expert declared that Indigenous and Traditional Peoples do not exist in Croatia. CNRA indicator 2.3. draws the same conclusion.</p> <p>Thus, all people are equal in Croatia. There are no special laws about different groups of people in relation to forests and customary rights.</p> <p>The Forest law is the only applicable law and it allows all people free access to the state forest, for recreational purposes (Forest law, Article 21). It is also permitted to non-owners to collect non wood forest products for trade purposes. License is issued by the local forest authority.</p> <p>Hunting rights are defined with the Law on hunting.</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
		<p>https://www.hrw.org/world-report/2019/country-chapters/croatia</p> <p>United Nations Forum on Indigenous Issues, or Human Rights Watch</p> <p>https://www.un.org/esa/so-cdev/unpfii/documents/5session_factsheet1.pdf</p> <p>Local expert 2019</p>	<p>In the Forest law, Art. 38 states that collecting of the non-wood forest products should be according to the forest management plan and can be restricted or limited if specific species or functions of forests are endangered.</p> <p>Description of Risk</p> <p>1. Free access to forest was being questioned by forest owners as they were responsible if the forest is not properly managed/secured and therefore dangerous (hanging over trees etc). Last year a description was added to Forest law, Article 3, point 24 that “Free access means walking and other access, that is carried out at its own risk and is in accordance with the regulations governing forests”.</p> <p>Not all forests are accessible. Some enclosures in forests are done for natural regeneration purposes and some for raising game. Enclosures are generally very rare (source: local expert).</p> <p>2. Forest fruits and mushrooms can be gathered but not for commercial purposes. When aiming for commercial purposes a special permit from the forest authorities is needed. This according to the Forest law. There are some complaints of this requirement. In years of abundant fungus growth picking is common and some fines are issued by forest inspectors for picking more than 2 kg of mushrooms per person per day (above 2 kg it becomes commercial) (source: local expert).</p> <p>Risk Conclusion</p> <p>This indicator is considered N/A (even though in practice it might seem as some rights are customary).</p>
1.14 Free prior and informed consent	<p>Applicable laws and regulations</p> <p>Ordinance on forest management 2018</p>	Global Forest Watch, Country profile 2019	<p>Overview of Legal Requirements</p> <p>Forest owners have the possibility to express opinions or complaints regarding forest management plans during public consultation rounds</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Pravilnik o uređivanju šuma (OG 97/2018) https://narodne-novine.nn.hr/clanci/sluzbeni/2018_11_97_187_5.html</p> <p>Overview of current public consultations for the forest sector, 2019: https://www.hrsume.hr/index.php/hr/javni-uvjid</p> <p>Forest law 2019 Zakon o šumama (OG 140/05, 82/06, 129/08, 80/10, 124/10, 25/12, 68/12, 148/13, 94/14, 68/18, 14/19) https://narodne-novine.nn.hr/clanci/sluzbeni/2018_07_68_139_2.html</p> <p>Legal Authority Ministry of Agriculture, https://poljoprivreda.gov.hr/</p> <p>Ministry of Environment and Energy https://www.mzoip.hr/en/</p> <p>Legally required documents or records N/A</p>	<p>https://www.globalforestwatch.org/dashboards/country/HRV</p> <p>Chatham House, Illegal Logging Indicators Country Report Card, 2019 https://www.illegal-logging.info/regions/Croatia</p> <p>FAO, global forest resources assessment (FRA) report for Croatia, 2010 http://www.fao.org/3/al485E/al485e.pdf</p> <p>FAO, FRA report 2015 http://www.fao.org/3/a-i4808e.pdf</p> <p>Local expert 2019</p>	<p>based on the Ordinance on forest management. The public consultation is usually two weeks with one public presentation in State forest company.</p> <p>According to the Forest law article 29, the Ministry of Agriculture is responsible to issue the Forest management plans. Before the final improvement the responsible ministry for protected areas management (Natura 2000 network) should also accept the plan (Ministry of Environment and Energy).</p> <p>Following the regulations, a further consent from stakeholders is not needed when the process above is followed.</p> <p>Free prior and informed consent in connection to indigenous peoples and to collective ownership or transfer of management rights is not applicable in the country because indigenous and traditional peoples do not exist in the country (see indicator 1.13 above).</p> <p>Description of Risk 1.As forest owners usually complain unofficially and with poor professional interpretation, their complaints are usually not accepted and in some cases answered orally not going in the records. Consequently, they usually do not go to the public debates. But the opportunities are offered, thus discussions are possible (source: local expert).</p> <p>What other sources say International sources (like FAO, Chatham House, Global Forest Watch) do not mention any problems with regards to this topic.</p> <p>Risk Conclusion This indicator is considered N/A.</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
<p>1.15 Indigenous people's rights</p>	<p>Applicable laws and regulations No special legislation available.</p> <p>Legal Authority N/A</p> <p>Legally required documents or records N/A</p> <p>Other documents Census of Population, Households and Dwellings Croatian Bureau of Statistics. (Statistički ljetopis Republike Hrvatske) 2011 2011 https://www.dzs.hr/Eng/censuses/census2011/censuslogo.htm</p>	<p>Minority rights, website, 2019 https://minorityrights.org/country/croatia/</p> <p>The Indigenous World, website, 2019 https://www.iwgia.org/en/search-result?searchword=croatia&searchphrase=all</p> <p>United Nations, Special Rapporteur on the rights of indigenous peoples, 2019 http://www.ohchr.org/en/issues/ipeoples/srindigenoupeoples/pages/sripeople/index.aspx</p> <p>University of Zadar, Population and settlements of Croatia 2015 https://www.researchgate.net/publication/288668151_population_and_settlements_of_croatia</p>	<p>There are no Indigenous and Traditional Peoples as per definition of ILO, The Indigenous World, United Nations or Minority rights in Croatia.</p> <p>According to the 2011 census, the most prominent national minority in Croatia are the Serbs (11.5% in 1981, 4.5% in 2001, 4.4% in 2011). There were less than 1% Bosniaks (0.5% in 2001, 0.7% in 2011), and in 2011. Italians (0.42%), Albanians (0.41%), Roma (0.40%), Hungarians (0.33%), Slovenians (0.25%), Czechs (0.22%), and others (Slovaks, Montenegrins, Macedonians, Germans, Ruthenians, Ukrainians, Bulgarians, Turks, Russians, Poles, Jews, etc).</p> <p>These are not considered IP or TP in the country legislation. International sources declared that Indigenous and Traditional Peoples do not exist in Croatia.</p> <p>Thus, all people are equal in Croatia. There are no special laws about different groups of people in relation to forests and Indigenous People's rights.</p> <p>Risk Conclusion This indicator is considered N/A.</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
Trade and transport			
<p>1.16 Classification of species, quantities, qualities</p>	<p>Applicable laws and regulations</p> <p>Ordinance on the marking of trees, marking of wood assortments, compensations and forestry order 2015 Pravilnik o doznaci stabala, obilježavanju drvnih sortimenata, popratnici i šumskom redu (NN 17/2015, 57/2015) https://narodne-novine.nn.hr/clanci/sluzbeni/2015_02_17_332.html https://narodne-novine.nn.hr/clanci/sluzbeni/2017_06_57_1270.html</p> <p>Forest law 2019 Zakon o šumama (OG 140/05, 82/06, 129/08, 80/10, 124/10, 25/12, 68/12, 148/13, 94/14, 68/18, 14/19) https://narodne-novine.nn.hr/clanci/sluzbeni/2018_07_68_1392.html</p> <p>Law on State inspectorate 2019 Zakon o državnom inspektoratu (NN 115/18) https://zakon.hr/z/298/Zakon-o-drzavnom-inspektoratu</p> <p>EU Timber Regulation 2010 (No. 995/2010) https://poljoprivreda.gov.hr/UserDocsImages/dokumenti/sume/drvna_industrija/EUTR/CELEX_3A32010R0995_3AHR_3ATXT.pdf</p>	<p>Chatham House, Illegal Logging Indicators Country Report Card, 2019 https://www.illegal-logging.info/regions/Croatia</p> <p>FAO, global forest resources assessment report (FRA) for Croatia, 2010 http://www.fao.org/3/al485E/al485e.pdf</p> <p>FAO, FRA report 2015 http://www.fao.org/3/a-i4808e.pdf</p> <p>Forest Europe, country report, 2015 http://foresteurope.org/state-europes-forests-2015-report/#1476295965372-d3bb1dd0-e9a0</p> <p>Local expert 2019</p>	<p>Overview of Legal Requirements</p> <p>This is also related to the implementation of EUTR. Description of the implementation of EUTR in Croatia can be found under indicator 1.21.</p> <p>The Ordinance on the marking of trees, marking of wood assortments, compensations and forestry order explains how the classification is organized.</p> <p>Tree marking and transport is explained in the Forest law, Article 37. All wood that is going to be transported must have a transport certificate that describes the quantity, quality and species of the wood transported. With state forests such a transport certificate is issued by state forest company after checking the harvesting. Those of the private forests are issued by the licensed forest engineer that is working for the private forest owner.</p> <p>The transport certificate includes the data on the supplier, purchaser, specie, and quantity of timber assortments, date, time and purpose of the transport. A transport certificate must be kept by the transporters and disclosed for inspection at the request of the police, customs administration and forestry inspection.</p> <p>A transport certificate is received by a forest owner from the licensed person (often an independent expert) which issues it on the basis of the felling permit. A forest owner is then obliged to hand over the transport certificate to the transporter upon the acquisition of wood.</p> <p>Transport certificates from the public forest are issued by the state forest company. Those of the private forests are issued by the licensed forest engineer that is working for the private forest owner.</p> <p>The competent authority is the Ministry for Agriculture for forest operators and the Ministry of Finance for the transport. Controls are organized with</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Forest Law Enforcement, Governance and Trade (FLEGT) EU Action plan 2003 (COM 2003 251 final) https://poljoprivreda.gov.hr/UserDocsImages/dokumenti/sume/drvna_industrija/EUTR/CELEX_3A32010R0995_3AHR_3ATXT.pdf</p> <p>Legal Authority Ministry of Agriculture https://poljoprivreda.gov.hr/</p> <p>Ministry of Finance http://www.mfin.hr/en</p> <p>Legally required documents or records Transport certificate that comes with every timber load.</p> <p>Other documents Inspection service / Croatian Agency for Environment and Nature (HAOP) 2019 Now part of MEPE. http://www.haop.hr <i>Annual reports:</i> http://www.haop.hr/hr/godisnja-izvjesca-o-pracenju-emisija-oneciscujucih-tvari-u-zrak-iz-nepokretnih-izvora-na-teritoriju</p>		<p>the establishment of the new State inspectorate, that is also acting as forest inspectors.</p> <p>State inspection and law enforcement The State Inspection service also includes the forestry and hunting inspection and is in charge with law enforcement on forests and forest land owned by the state and private. There are state inspectors and regional inspectors. The inspection service can also request the help of the Forestry Chamber to judge the technical quality of the work carried out in the field. Inspections are taking place throughout the country.</p> <p>There are no publically available reports by the government about illegal harvesting, court cases or State inspection reports in the forestry sector. Such is also not reported in the annual reports the of Ministry of Agriculture, Hrvatske šume ltd, the Croatian Agricultural and Forestry Advisory Service, the Ministry for Environmental Protection and Energy (MEPE) or the Croatian Agency for Environment and Nature.</p> <p>It can be found that the Forest inspection in year 2017, for example, made 2 317 surveillances, but no further content or conclusions are reported. And nothing is stated about problems with the classification of timber.</p> <p>The legislation itself is well implemented and forest owners are aware of the laws (source: local expert).</p> <p>Description of Risk 1.The operators in Croatia are not sufficiently aware of the EUTR provisions, nor have they had an access to designing DDSs. The Ministry of Agriculture has built its capacities to function in its role of the Competent Authority as well as organized general training on the topic for the operators. However, no monitoring organizations have been engaged to</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Official website of the Ministry of Agriculture 2019 https://poljoprivreda.gov.hr/o-ministarstvu/9 <i>Annual reports:</i> https://poljoprivreda.gov.hr/istaknute-teme/poljoprivreda-173/poljoprivredna-politika/agroekonomske-analize/zeleno-izvjesce/189</p> <p>Official website of Hrvatske šume https://www.hrsume.hr 2019 <i>Annual reports:</i> https://www.hrsume.hr/index.php/en/annual-statements</p> <p>Official website of the Ministry for Environmental Protection and Energy (MEPE) 2019 https://www.mzoip.hr/hr/priroda.html 2019 <i>Annual reports:</i> https://mzoe.gov.hr/pristup-informacijama/strategije-planovi-i-ostali-dokumenti/godisnje-izvjesce-o-radu-ministarstva/1072</p> <p>Croatian Agency for Environment and Nature 2019 http://envi-metapodaci.azo.hr/geonetwork/srv/hrv/catalog.search#/metadata/5f8947fc-67f7-446d-9dea-c83dae24fa89</p>		<p>facilitate participation of operators in designing DDSs . A description of the implementation of EUTR in Croatia can be found under indicator 1.21, as well as sources stating the actual situation). Nevertheless, things with regards to the EUTR can be improved, and these are also related to the transport documents etc (sources: see indicator 1.21).</p> <p>What other sources say Other international sources do not state any problems with Classification. The Local expert is also not aware of any substantial news items in the local media and declares this indicator low risk.</p> <p>Although the implementation of EUTR can be improved there are no signals that the actual <i>classification of timber</i> is at stake.</p> <p>Risk Conclusion All together the risks with regards to this indicator are low.</p> <p>Low risk threshold (1) is met: Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the authorities and/or by the relevant entities.</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p><i>Annual reports:</i> http://www.haop.hr/hr/godisnja-izvjesca-o-pracenju-emisija-oneciscujucih-tvari-u-zrak-iz-nepokretnih-izvora-na-teritoriju</p>		
1.17 Trade and transport	<p>Applicable laws and regulations</p> <p>Forest law 2019 Zakon o šumama (OG 140/05, 82/06, 129/08, 80/10, 124/10, 25/12, 68/12, 148/13, 94/14, 68/18, 14/19) https://narodne-novine.nn.hr/clanci/sluzbeni/2018_07_68_139_2.html</p> <p>Ordinance on the marking of trees, marking of wood assortments, compensations and forestry order, 2015 Pravilnik o doznaci stabala, obilježavanju drvnih sortimenata, popratnici i šumskom redu (NN 17/2015, 57/2015) https://narodne-novine.nn.hr/clanci/sluzbeni/2015_02_17_332.html https://narodne-novine.nn.hr/clanci/sluzbeni/2017_06_57_127_0.html</p> <p>EU Timber Regulation 2010 (No. 995/2010) https://poljoprivreda.gov.hr/UserDocsImages/dokumenti/sume/drvna_industrija/EUTR/CELEX_3A32010R0995_3AHR_3ATXT.pdf</p>	<p>PSC, Retail trade in wood products, 2019 http://psc.hr/en/retail-trade-wood-products/</p> <p>Global Forest Watch, Country profile 2019 https://www.globalforestwatch.org/dashboards/country/HRV</p> <p>FAO, global forest resources assessment report (FRA) for Croatia, 2010 http://www.fao.org/3/al485E/al485e.pdf</p> <p>FAO, FRA report 2015 http://www.fao.org/3/a-i4808e.pdf</p> <p>UNECE, country report 2004 http://www.unece.org/fileadmin/DAM/timber/docs/se</p>	<p>Overview of Legal Requirements</p> <p>The Ordinance on the marking of trees, marking of wood assortments, compensations and forestry order explains how the trade and classification is organized.</p> <p>A second source of tree marking and transport is explained in the Forest law, Article 37. All wood that is going to be transported must have a transport certificate that describes the quantity, quality and species of the wood transported. With state forests such a transport certificate is issued by state forest company after checking the harvesting, which was of course based on a harvesting permit. The transport certificates of the private forests are issued by the licensed forest engineer that is working for the private forest owner (and of course can only be issued when a harvesting permit is in place as well).</p> <p>Selling and buying timber with tenders.</p> <p>Any owner of wood assortments (Hrvatske šume d.o.o., other beneficiaries of state forest, private forest owners and other legal or natural persons) may submit an application for publication and soliciting for tender for sale of wood assortments, in accordance with the submitted approval for cutting of forest by an authorized person pursuant to forestry regulations, to the Commission (Ministry of the Economy, Entrepreneurship and Crafts.). The documentation for the sale of wood assortments through tenders has to be clear, comprehensible and unambiguous and has to include a specification of wood assortments sorted by type, quality and calculation of the value of wood assortments for the initial competition price. Wood assortments at</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Forest law Enforcement, Governance and Trade (FLEGT) EU Action plan 2003 (COM 2003 251 final) https://poljoprivreda.gov.hr/UserDocsImages/dokumenti/sume/drvna_industrija/EUTR/CELEX_3A32010R0995_3AHR_3ATXT.pdf</p> <p>Law on implementation of EU directives regarding trade with illegally harvested wood and wooden products 2015 Zakon o provedbi uredbi EU u vezi s trgovinom ilegalno posječenim drvom i proizvodima od takvog drva (NN 54/13) https://www.documents.clientearth.org/wp-content/uploads/library/2015-08-06-croatia-eutr-implementing-legislation-ext-hr.pdf</p> <p>Law on state inspectorate 2019 Zakon o državnom inspektoratu (NN 115/18) https://zakon.hr/z/298/Zakon-o-drzavnom-inspektoratu</p> <p>Legal Authority Ministry of Agriculture http://www.mps.hr</p> <p>Ministry of Finance http://www.mfin.hr/en</p> <p>Ministry of the Interior https://mup.gov.hr/ministry/119</p>	<p>m/2004-1/full_reports/Croatia.pdf</p> <p>WWF, Environmental Crime Threatens Europe's Last Pristine Forests and Iconic Wildlife 2017, http://wwf.panda.org/?317050/Environmental%2DCrime%2DThreatens%2DEuropes%2DLast%2DPristine%2DForests%2Dand%2DIconic%2DWildlife REC, Illegal logging in SEE, working paper 2010 http://www.envsec.org/publications/illegal_logging_in_south_eastern_european_report_en_oct_2010.pdf</p> <p>Local expert 2019</p>	<p>warehouses should be stacked, sorted, visibly marked in accordance with special regulations and prepared for sale by auction.</p> <p>The content and handling of the transport certificate. The transport certificate includes the data on the supplier, purchaser, specie, and quantity of timber assortments, date, time and purpose of the transport. A transport certificate must be kept by the transporters (it was received from the forest owner) and disclosed for inspection at the request of the police, customs administration and forestry inspection.</p> <p>The newly created State Inspection service, Police and Financial Administration are doing regular checks of trucks with regards to compliance with paperwork and EUTR (illegal timber) requirements. There are no fixed control points, but controls are done randomly. The competent authority is the Ministry for Agriculture for forest operators, Ministry for finance for the transport, and the newly created State Inspectorate with forest inspection.</p> <p>State inspection and law enforcement The State Inspection service also includes the forestry and hunting inspection and is in charge with law enforcement on forests and forest land owned by the state and private. There are state inspectors and regional inspectors. The inspection service can also request the help of the Forestry Chamber to judge the technical quality of the work carried out in the field. Inspections are taking place throughout the country.</p> <p>There are no publically available reports by the government about illegal harvesting, court cases or State inspection reports in the forestry sector. Such is also not reported in the annual reports the of Ministry of Agriculture, Hrvatske šume ltd, the Croatian Agricultural and Forestry Advisory Service,</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Ministry of the Economy, Entrepreneurship and Crafts. https://www.mingo.hr/en</p> <p>Inspection service / Croatian Agency for Environment and Nature (HAOP) 2019. Now part of MEPE. http://www.haop.hr <i>Annual reports:</i> http://www.haop.hr/hr/godisnja-izvjesca-o-pracenju-emisija-oneciscujucih-tvari-u-zrak-iz-nepokretnih-izvora-na-teritoriju</p> <p>Legally required documents or records Transport certificate that comes with every timber load.</p>		<p>the Ministry for Environmental Protection and Energy or the Croatian Agency for Environment and Nature.</p> <p>It can be found that the Forest inspection in year 2017, for example, made 2 317 surveillances, but no further content or conclusions are reported. And nothing is stated about problems with the classification of timber.</p> <p>According to the older data (2003) of the Customs Office of the Ministry of Finance, the Customs houses all along the Croatian border with the neighboring countries established the following irregularities in the course of the years 2002 and 2003 at the border crossings and internal customs offices. Altogether 198 755 kg (around 331 m3) of round wood, sawn timber, semi-products and fuelwood were incorrectly declared while being either exported, or imported. Of the whole quantity, 171 755 kg (286 m3) were incorrectly declared as to the species, quantity, or value, while 27,000 kg (45 m3) were transported as fuelwood outside the official border crossings.(UNECE Report 2004). No further official data is available because such is not reported by governmental organisations.</p> <p>Description of Risk The operators in Croatia are not sufficiently aware of the EUTR provisions, and current Croatian laws, nor have they had an access to designing DDSs. This could lead to problems with trade and transport documentation and regulations. Nevertheless the Ministry of Agriculture has assigned people to the role of the Competent Authority to build a solid organisation. They also organized general training on the topic for the operators. However, no monitoring organizations have been engaged to facilitate participation of operators in designing DDSs. A description of the implementation of EUTR in Croatia can be found under indicator 1.21. Nevertheless, things with regards to the EUTR can be improved but that</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
			<p>doesn't automatically mean that there are actual <i>trade and transport</i> problems in the sector (source: local expert).</p> <p>What other sources say Other international sources do not state any problems with trade and transport. The local expert is also not aware of any substantial news items in the local media and declares this indicator low risk.</p> <p>Croatia is not mentioned in the category of countries with the UN Security Council ban on timber export, or any ban on timber export. The conclusion of the related CNRA indicator 2.1. is also low risk.</p> <p>Although the implementation of EUTR can be improved there are no signals that there are large <i>Trade and transport</i> problems in the sector.</p> <p>Risk Conclusion All together the risks with regards to this indicator are low.</p> <p>Low risk threshold (1) is met: Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the authorities and/or by the relevant entities.</p>
1.18 Offshore trading and transfer pricing	<p>Applicable laws and regulations Corporate income tax act, article 13, 2018. Zakon o porezu na dobit. (NN 177/04, 90/05, 57/06, 146/08, 80/10, 22/12, 148/13, 143/14, 50/16, 115/16, 106/18) https://www.zakon.hr/z/99/Zakon-o-porezu-na-dobit</p>	<p>IFRS, International Financial Reporting Standards, 2019 https://www.ifrs.org/use-around-the-world/why-global-accounting-standards/</p>	<p>Overview of Legal Requirements Croatia is signatory of an international tax standard IFRS and member of the Organisation for Economic Co-operation and Development (OECD). Croatia follows the International Financial Reporting Standards (IFRS) which is an accounting standard issued by the IFRS Foundation and the International Accounting Standards Board (IASB). Members of OECD have agreed on exchange of information and standardization.</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Corporate income tax regulations, article 40 2019 Pravilnik o porezu na dobit (NN 95/05, 133/07, 156/08, 146/09, 123/10, 137/11, 61/12, 146/12, 160/13, 12/14, 157/14, 137/15, 1/17, 2/18, 1/19, 1/20) https://www.porezna-uprava.hr/HR_porezni_sustav/_layouts/in2.vuk.sp.propisi.intranet/propisi.aspx#id=pro23</p> <p>General tax act, article 41 paragraph 2 2016 Opći porezni zakon (NN 115/16, 106/18, 121/19, 32/20). https://www.zakon.hr/z/100/Op%C4%87i-porezni-zakon</p> <p>Guidelines for auditing transfer prices for tax inspectors 2019 Smjernice za reviziju transfernih cijena za porezne inspektore 2019. Godine. <i>Not published online.</i></p> <p>Law on value added tax (PDV) 2018 Zakon o porezu na dodanu vrijednost (OG 106/18) http://www.porezna-uprava.hr/hr_propisi/_layouts/in2.vuk.sp.propisi.intranet/propisi.aspx#id=pro1467</p> <p>Cadastral income tax 1995 Zakon o utvrđivanju katastarskog prihoda (OG 108/95) https://narodne-novine.nn.hr/clanci/sluzbeni/1995_12_108_17_83.html</p>	<p>OECD, Croatia country profile, 2018: http://www.oecd.org/countries/croatia/ https://www.oecd-ilibrary.org/taxation/global-forum-on-transparency-and-exchange-of-information-for-tax-purposes-peer-reviews-croatia-2016_9789264250673-en</p> <p>Deloitte, 2016, Global Transfer Pricing Country Guide. https://www2.deloitte.com/content/dam/Deloitte/us/Documents/Tax/us-tax-2016-global-transfer-pricing-country-guide-051816.pdf</p> <p>KPMG, 2019, Country report. https://home.kpmg/xx/en/home/insights/2016/07/europe-tax-croatia-country-profile.html</p>	<p>Recent changes to the tax regime reduced income and corporate taxes. The government has committed to simplifying the tax system in order to facilitate better business and more investment.</p> <p>The Croatian tax authorities placed a concentrated focus on the transfer pricing area during 2015. Due to the changes to the Corporate income tax regulations that apply from 2019 onwards, all taxpayers, regardless of their size, are now required to submit the “Report on business transactions with related parties” jointly with their corporate income tax return (the so called ‘PD’ tax return form), if they have recorded business transactions with related entities during the tax year.</p> <p>With regards to offshore trading and transfer pricing the Croatian corporate income tax act, article 13, Corporate income tax regulations, article 40; General tax act, article 41 paragraph 2, and Guidelines for auditing transfer prices for tax inspectors, issued in 2019 in the tax authorities’ gazette, are applicable. These documents explain what rules are applicable.</p> <p><i>Transfer pricing & offshore trading</i></p> <p>The Croatian transfer pricing & offshore trading regulations require that all transactions between related parties must be conducted at arm’s length. According to article 13 of the Corporate income tax act, parties are considered related if one of them participates, directly or indirectly, in the management, control, or capital of the other party, or if the same persons participate, directly or indirectly, in the company’s management, control, or capital.</p> <p>Transfer pricing & offshore trading rules apply to domestic and cross-border transactions between related parties, as well as to domestic transactions when operating at a loss, has tax loss carried forward, pays tax at lower rate, or qualifies for tax relief. Transfer pricing & offshore</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Legal Authority Ministry of Agriculture http://www.mps.hr</p> <p>Ministry of Finance http://www.mfin.hr/en</p> <p>Ministry of the Interior https://mup.gov.hr/ministry/119</p> <p>Inspection service / Croatian Agency for Environment and Nature (HAOP) 2019. Now part of MEPE. http://www.haop.hr <i>Annual reports:</i> http://www.haop.hr/hr/godisnja-izvjesca-o-pracenju-emisija-oneciscujucih-tvari-u-zrak-iz-nepokretnih-izvora-na-teritoriju</p> <p>Legally required documents or records Tax declarations.</p>	<p>Global Forest Watch, 2019 Country profile. https://www.globalforestwatch.org/map/country/HRV?mainMap=eyJzaG93QW5hbHlzaXMiOnRydWV9&map=eyJ6b29tIjo2LjU5ODY5MTYwMDC1MzIxMzYyY2VudGVyIjpw7ImxhdCI6NDQuNTA1MTU1MTM3ODg5NDIsImxuZyl6MTYuNDYyMzc5NDU1MDEyMzI0M0MjU1NjYxOS40MzUxNzY4NSw0Ni41NTA1MTgwNF19&menu=eyJkYXRhc2V0Q2F0ZWdvcnkiOiJmb3Jlc3RDZGFuZ2UiLCJtZW51U2VjdGlvbil6IiJ9</p> <p>EY, Transfer pricing global reference guide, 2012 https://www.ey.com/gl/en/services/tax/international-tax/transfer-pricing-and-tax-effective-supply-chain</p>	<p>trading methodologies are prescribed in accordance with the OECD transfer pricing guidelines (Deloitte report 2018).</p> <p>Besides this, the national tax laws are applicable. Taxes of forest owners are calculated throughout the 'cadastral income' (Law on cadastral income). Taxes are collected regularly in a standardized way (law on tax procedure). See indicators 1.6 and 1.7. It depends on the type of entity if the regular Law on income tax or Corporate income tax laws are to be used.</p> <p>Description of Risk There is no data available or reported about problems with offshore trading and transfer pricing. One older EY report (2012) state that: <i>'In past few years; the tax authorities have increased the frequency of transfer pricing audits. As they still have limited experience in transfer pricing, there are many disputes, as well as requirements for supporting explanations with respect to related party charges and additional documentation. However, there is a noticeable trend towards increased awareness of transfer pricing problems among the tax authorities' officials'.</i></p> <p>The business community is currently working with the Ministry of Economy and Entrepreneurship and Crafts to identify which fees should be removed. On March, 2018, the Croatian Government announced the Action Plan for Removing Administrative Fees and pledged to relieve a total of approximately USD 100 million worth of fees in 2018 (no further news since then).</p> <p>What other sources say There are no sources stating that the forestry sector is different from the general context. But there are also no public signals or sources in the</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
		<p>management/2012-transfer-pricing-global-reference-guide---croatia</p> <p>Transparency International, CPI index 2019 https://www.transparency.org/country/HRV</p> <p>WTO, 2002, report Croatia https://www.wto.org/english/thewto_e/countries_e/croatia_e.htm</p> <p>Chatham House, Illegal Logging Indicators Country Report Card, 2019 https://www.illegal-logging.info/regions/Croatia</p> <p>Local expert, 2019</p>	<p>media stating that illegal activities with regards to offshore trading and transfer pricing in the timber sector is actually happening. Currently there are also no known published court cases that proof otherwise.</p> <p>International sources, like KPMG, Deloitte, OECD, WTO, Global Forest Watch or Chatham House Illegal Logging, do not draw other conclusions.</p> <p>The CPI index for Croatia in 2019 stands at 47 (where 1 is most corrupt). According to FSC directive (FSC-DIR-40-005) we have to take extra care when the Corruption Perception Index (CPI) for the given country is equal to or below 50. This is the case for Croatia and on top of that there is a downwards trend for the last year which is not good news. Its means that in general we have to be careful with relying only on governmental sources and is necessary to look at other, independent, sources for confirmations of data and statements where possible.</p> <p>Although no local evidence is available to guarantee a full implementation it is clear that the country is a signatory to all relevant international agreements and these international sources do not list any problems with regards to this issue. Local media and the local expert do not contradict this conclusion.</p> <p>Risk Conclusion All together the risks with regards to this indicator are low.</p> <p>Low risk threshold (1) is met: Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the authorities and/or by the relevant entities.</p>
1.19 Custom regulations	<p>Applicable laws and regulations</p> <p>Customs law 2016 Zakon o carinskoj službi https://zakon.hr/z/251/Zakon-o-carinskoj-službi</p>	<p>OECD, Croatia country profile, 2018 http://www.oecd.org/countries/croatia/</p>	<p>Overview of Legal Requirements</p> <p>Timber import or export follows general trade regulations for all products and services that are exported. Therefore, the regular Customs law is applicable besides the Law on implementation of EU custom regulation.</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Law on implementation of EU custom regulation, 2016 Zakon o provedbi carinskog zakonoda vstva EU https://carina.gov.hr/UserDocsImages//dokumenti/Procedure//Zakon_o_provedbi_c_z_EU.pdf</p> <p>Customs service act 2019 Zakon o carinskoj službi (NN 68/13, 30/14, 115/16, 39/19) https://www.zakon.hr/z/251/Zakon-o-carinskoj-slu%C5%BEbi</p> <p>Act on investment promotion 2018 Zakon o poticanju ulaganja (OG No. 102/15; 25/18) https://www.zakon.hr/z/829/Zakon-o-poticanju-ulanja</p> <p>Legal Authority Ministry of finance http://mfin.hr/en/customs-administration</p> <p>Tax administration http://www.mfin.hr/en/tax-administration</p> <p>Legally required documents or records Records of implemented custom systems (also online).</p>	<p>Societe Generale, Croatia Customs 2018. https://import-export.societegenerale.fr/en/country/croatia/presentation-geography</p> <p>TARIC, website, 2019 https://ec.europa.eu/taxation_customs/dds2/taric/taric_consultation.jsp?Lang=en</p> <p>Local expert 2019</p> <p>WTO, 2002, report Croatia: https://www.wto.org/english/thewto_e/countries_e/croatia_e.htm</p> <p>US department of State, 2018 Investment Climate Statements for Croatia: https://www.state.gov/e/e/b/rls/othr/ics/2018/eur/281569.htm</p> <p>Global Forest Watch, Country profile 2019</p>	<p>By entry into force of the Customs service act, in accordance with the standards of the EU 'acquis communautaire' and with the necessity of extending the activities that were the result of the accession of the Republic of Croatia to the European Union, the role of customs service was strengthened. This regarding to the combating of unlawful actions taken when carrying out economic activities or transactions, so-called "grey economy", and, in relation to that, the occurrence of tax evasion, smuggling, money laundering and other forms of behaviour liable to punishment.</p> <p>The amendments to the internal organization of the Customs Administration, along with the already existing tasks, as a next step towards the more efficient strengthening of the supervisory role of the Customs Administration, enabled more efficient and effective performance of inspection supervision. And as well as stronger activity in combating grey economy, particularly in the area of the trade of goods and services, suppression and prevention of non-registered activity, catering industry and tourism, protection of intellectual property, participation in the implementation of measures of common agricultural, fisheries and trade policy, supervision over the import, export, entry and exit of cultural goods, trade in precious metals and forest reproductive material, and the performance of audio-visual activities, as well as more uniform actions taken within the inspection supervision.</p> <p>The Act on investment promotion provides the legal framework that prescribes certain incentives to investors. The Croatian Constitution states that no law or any other enactment shall reduce the rights acquired through capital investment. It also ensures free repatriation of profits and capital upon termination of investment.</p> <p>Croatia is a member of the EU and fully accepts its foreign trade policy. Operations carried out within the EEA (European Economic Area) are free</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
		<p>https://www.globalforestwatch.org/dashboards/country/HRV</p> <p>Chatham House Illegal Logging Indicators Country Report Card, 2019 https://www.illegal-logging.info/regions/Croatia</p> <p>Transparency International, CPI index 2019 https://www.transparency.org/country/HRV</p>	<p>of duty. The Common Customs Tariff of the European Union applies to goods originating outside Europe. Generally, the duty is relatively low, especially for industrial products (4.2% on average). Tariffs for EU origin can be found on TARIC Consultation Website.</p> <p><i>Import Procedures</i> Since its accession to the EU, Croatia has adopted the EU Common External Tariff. Consequently, trade with Croatia is free of customs duties when the country of origin of the goods is one of the other EU Member States.</p> <p>Description of Risk There are no known cases of timber being imported or exported without proper customs papers or falsifying HS codes. There are also no public signals or sources in the media stating that illegal activities with regards to custom regulations and the timber sector are actually happening. Currently there are also no known court cases that prove otherwise. The local expert declares the same. International sources, like OECD, WTO, US department of State, Global Forest Watch or Chatham House Illegal Logging, do not draw other conclusions. There are no known cases of timber being imported or exported without proper customs papers.</p> <p>The Croatian investment climate and the quality of Croatia's public governance also suffers from a rather complex and multi-layered network of public administrations. Such a multi-layered public administration creates a cumbersome and confusing environment for businesses and individual entrepreneurs who have to navigate through it. (OECD report, 2018). Croatia became a member of the EU in 2013, which has enhanced stability and has begun to provide new opportunities for trade and investment.</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
			<p>Croatia is slowly accessing a substantial amount of available EU funds, but many direct economic benefits of EU entry are still to come.</p> <p>Foreign investors have the same rights, obligations and legal status within an enterprise as domestic investors, provided the condition of reciprocity is met.</p> <p>What other sources say</p> <p>The CPI index for Croatia in 2019 stands at 47 (where 1 is most corrupt). According to FSC directive (FSC-DIR-40-005) we have to take extra care when the Corruption Perception Index (CPI) for the given country is equal to or below 50. This is the case for Croatia and on top of that there is a downwards trend for the last year which is not good news It means that in general we have to be careful with relying only on governmental sources and is necessary to look at other, independent, sources for confirmations of data and statements where possible.</p> <p>Risk Conclusion</p> <p>All together the risks with regards to this indicator are low.</p> <p>Low risk threshold (1) is met: Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the authorities and/or by the relevant entities.</p>
1.20 CITES	<p>Applicable laws and regulations</p> <p>Croatia is a signatory of CITES since 1999 (OG 12/99)</p> <p>https://www.cites.org/eng/cms/index.php/component/cp/country/HR</p>	<p>CITES, website with CITES lists, 2019</p> <p>http://checklist.cites.org/#/en</p> <p>and</p>	<p>Overview of Legal Requirements</p> <p>Croatia has no CITES tree species.</p> <p>According to the Law on environmental protection, strictly protected species comprise 989 plant taxa. The only protected tree species in Croatia is <i>Taxus baccata</i> and this is not on the CITES list.</p> <p>Further details about <i>trading</i> with protected species can be found in the Rules on transboundary transport and trade with protected species, the Law</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>https://narodne-novine.nn.hr/clanci/medunarodni/1999_10_12_196.html</p> <p>Law on environmental protection 2019 Zakon o zaštiti prirode (OG 14/19) https://www.zakon.hr/z/403/Zakon-o-za%C5%A1titi-prirode</p> <p>Rules on transboundary transport and trade with protected species 2006 Pravilnik o prekograničnom prometu i trgovini zaštićenim vrstama (NN 34/2006) https://narodne-novine.nn.hr/clanci/sluzbeni/full/2006_03_34_873.html</p> <p>Law on transboundary transport and trade with wild species 2013 Zakonom o prekograničnom prometu i trgovini divljim vrstama (NN 94/13). https://www.zakon.hr/z/659/Zakon-o-prekograni%C4%8Dnom-prometu-i-trgovini-divljim-vrstama</p> <p>Rules on alien species allowed for the market and invasive species 2017 Pravilnik o stranim vrstama koje se mogu stavljati na tržište te invazivnim stranim vrstama (Narodne novine, broj 17/17). http://www.propisi.hr/print.php?id=14567</p>	<p>http://checklist.cites.org/#/en/search/country_ids%5B%5D=149&output_layout=alphabetical&level_of_listing=0&show_synonyms=1&show_author=1&show_english=1&show_spanish=1&show_french=1&scientific_name=&page=1&per_page=20</p> <p>CITES, At COP17 The amended list of protected species, called Appendices, is legally binding, 2017 https://www.cites.org/eng/new_CITES_trade_rules_come_into_effect_as_2017_starts_02012017</p>	<p>on transboundary transport and trade with wild species, and the Rules on alien species allowed for the market and invasive species.</p> <p>There are no further laws dealing with CITES species, nor is this required. HAOP did publish general information about protected species in Croatia (see link in left column).</p> <p>Description of Risk There are no tree species on the CITES list, thus there are no risks.</p> <p>What other sources say According to the Custom financial annual report, in year 2017 were 16 irregularities regarding CITES confiscation related to trading, and 4 in 2018.</p> <p>The consulted local expert also declares that there are no CITES tree species. With regards to other Non Timber Forest Products (NTFPs) there is no commercial trade and no risk in relation to this indicator (source: local expert).</p> <p>Risk Conclusion All together the risks with regards to this indicator are low.</p> <p>Low risk threshold (1) is met: Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the authorities and/or by the relevant entities.</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Legal Authority Ministry of Environment and Energy https://www.mzoip.hr/en/</p> <p>Ministry of Finance, Custom Department http://www.mfin.hr/en</p> <p>Croatian Agency for Environment and Nature is the scientific authority related to CITES in Croatia. Croatian Agency for Environment and Nature (HAOP Now part of MEPE. http://www.haop.hr <i>Annual reports:</i> http://www.haop.hr/hr/godisnja-izvjesca-o-pracenju-emisija-oneciscujucih-tvari-u-zrak-iz-nepokretnih-izvora-na-teritoriju</p> <p>Legally required documents or records CITES export and import permits and CITES certificates enabling intra EU trade, registration documents. CITES website.</p> <p>Other documents Croatian annual Custom report, 2017 https://carina.gov.hr/UserDocsImages//5640/FINAL%20GODI%C5%A0NJE%20IZVJE%C5%A0%C4%86E%202017.pdf</p>		

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
	HAOP, More info about protected species, 2019. http://www.haop.hr/hr/tematska-podrucja/prirodne-vrijednosti-stanje-i-ocuvanje/planovi-upravljanja-i-mjere-ocuvanja-0		
Diligence/due care procedures			
1.21 Legislation requiring due diligence/due care procedures	<p>Applicable laws and regulations Forest law 2019 Zakon o šumama (OG 140/05, 82/06, 129/08, 80/10, 124/10, 25/12, 68/12, 148/13, 94/14, 68/18, 14/19) https://narodne-novine.nn.hr/clanci/sluzbeni/2018_07_68_139_2.html</p> <p>Law on implementation of EU regulation about wood and wood products transport 2018 - Zakon o provedbi uredbi EU o prometu drva i proizvoda od drva (OG 25/18) https://www.zakon.hr/z/1011/Zakon-o-provedbi-uredbi-Europske-unije-o-prometu-drva-i-proizvoda-od-drva</p> <p>Law on State inspectorate 2019 Zakon o državnom inspektoratu https://zakon.hr/z/298/Zakon-o-drzavnom-inspektoratu</p> <p>EU Timber Regulation 2010 (No. 995/2010) https://poljoprivreda.gov.hr/UserDocsImages/dokumenti/sume/drvna_industrija/EUTR/CELEX_3A32010R0995_3AHR_3ATXT.pdf</p>	<p>EU, EUTR general website, 2017</p> <p>EU, EUTR status of implementation per country, 2019</p> <p>Local expert 2019</p> <p>Global Forest Watch, Country profile 2019 https://www.globalforestwatch.org/dashboards/country/HRV</p> <p>UNEP, EUTR implementation report 2017 https://www.unep-wcmc.org/system/dataset_file_fields/files/000/000/519/original/Overview_of_CA_checks_June-</p>	<p>Overview of Legal Requirements Croatia has implemented the EUTR into the Law on implementation of EU regulation about wood and wood products transport.</p> <p>This law defines obligations of operators who place timber and timber products on the market. It explains that illegal harvested timber cannot longer enter the market and it introduces the due diligence system in Croatia. That law also points to the current system of existing harvesting permits (Forest law, article 37 about tree marking and transport, see also indicator 1.17) and the new Transport certificate (see also indicator 1.16). It also introduces the rules for import as set by the EUTR, which include third party verification, certificates of origin etc.</p> <p>All wood that is going to be transported must have a transport certificate that describes the quantity, quality and species of the wood transported.</p> <p>The transport certificate includes the data on the supplier, purchaser, specie, and quantity of timber assortments, date, time and purpose of the transport. A transport certificate must be kept by the transporters and disclosed for inspection at the request of the police, customs administration and forestry inspection.</p> <p>A transport certificate is received by a forest owner from the licensed person (often an independent expert) which issues it on the basis of the felling permit. A forest owner is then obliged to hand over the transport certificate to the transporter upon the acquisition of wood.</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Forest Law Enforcement, Governance and Trade (FLEGT) EU Action plan 2003 (COM 2003 251 final) https://poljoprivreda.gov.hr/UserDocsImages/dokumenti/sume/drvna_industrija/EUTR/CELEX_3A32010R0995_3AHR_3ATXT.pdf</p> <p>Legal Authority Ministry of Agriculture http://www.mps.hr</p> <p>Customs Authority under the 'Minister of Finance' of the republic of Croatia' http://www.mfin.hr/en</p> <p>The Forest Inspection Authority is part of the Inspectorate of the Republic of Croatia Inspection service / Croatian Agency for Environment and Nature (HAOP) 2019 Hrvatska agencija za okoliš I zaštitu prirode. Now part of MEPE. http://www.haop.hr <i>Annual reports:</i> http://www.haop.hr/hr/godisnja-izvjesca-o-pracenju-emisija-oneciscujucih-tvari-u-zrak-iz-nepokretnih-izvora-na-teritoriju</p>	<p>Nov2017_FINAL_30_04_2018.pdf?1525181749</p> <p>EU, European Commission second biennial EUTR report. 2018 https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52018DC0668&format=EN</p> <p>CURIA, European court cases against Croatia, 2019 http://curia.europa.eu/juris/recherche.jsf?ogp=&for=&mat=or&jge=&td=%3BALL&jur=C%2CT%2CF&dates=&pcs=Oor&lg=&pro=&nat=or&cit=none%25C%252CCJ%252CR%252C2008E%252C%252C%252C%252C%252C%252C%252C%252Ctrue%252Cfalse%25</p>	<p>Transport certificates from the public forest are issued by the state forest company. Those of the private forests are issued by the licensed forest engineer that is working for the private forest owner.</p> <p>The Ministry of Agriculture is the Competent Authority. The Forest inspection (newly created by the Law on State inspectorate) is the controlling body for forest owners and companies placing timber on the EU market.</p> <p>The Custom administration of the Republic of Croatia is responsible for EUTR implementation for export of timber to the rest of the EU.</p> <p>The Annual controlling programme is made on the basis of data of the Customs Information System and risk criteria such as: value of the timber and timber products (Annex 1 of the Regulation (EU) No. 995/2010) in customs procedures (import, export), various timber products, various countries of origin of timber products and the level of corruption in the Country of timber products (origin) - CPI (Corruption perception index). In the case that there is suspicion of illegal trade, Custom Administration shall carry out the check on operator immediately.</p> <p>State inspection and law enforcement The State Inspection service (HAOP) also includes the forestry and hunting inspection and is in charge with law enforcement on forests and forest land owned by the state and private. There are state inspectors and regional inspectors. The inspection service can also request the help of the Forestry Chamber to judge the technical quality of the work carried out in the field. Inspections are taking place throughout the country (source: State Inspection service documents, see links in the left column).</p> <p>There are no publically available detailed reports by the government about problems with the EUTR. It can be found that the Forest inspection in year</p>

Indicator	Applicable laws and regulations, legal authority, & legally required documents or records	Sources of Information	Risk designation and determination
	<p>Legally required documents or records Due Diligence system (harvesting permits), transport documents, documents of the origin of the wood.</p>	<p>2Cfalse&language=hr&avg=&cid=6486960</p>	<p>2017, for example, made 2 317 surveillances, but no further content or conclusions are reported. And nothing is stated about problems with regards to this indicator.</p> <p>In 2017 about 46 special EUTR checks were done (European Commission second biennial EUTR report). Checks were focused on timber from outside Croatia (import). And this resulted in fines up to 100.000 Euro. No further details are stated. 2018 figures are not yet available.</p> <p>Description of Risk The operators in Croatia are not sufficiently aware of the EUTR provisions, and current Croatian laws, nor have they had an access to designing DDSs. This could lead to problems with trade and transport documentation and regulations. Nevertheless, the Ministry of Agriculture has assigned people to the role of the Competent Authority to build a solid organisation. They also organized general training on the topic for the operators. Nevertheless, things with regards to the EUTR can be improved (as in most EU countries) (source: local expert).</p> <p>What other sources say From an international point of view, the EUTR is implemented properly in Croatia as there are no court cases between Europe vs Croatia going on (Source: CURIA) and the EUTR general website shows that Croatia has finished implementation.</p> <p>Risk Conclusion All together the risks with regards to this indicator are low.</p> <p>Low risk threshold (1) is met: Identified laws are upheld. Cases where law/regulations are violated are efficiently followed up via preventive actions taken by the authorities and/or by the relevant entities.</p>

Recommended control measures

The recommended control measures here are only indicative in nature, and are not mandatory. Recommended control measures might not have been provided for all the risks that have been identified in this risk assessment. Organizations shall evaluate and devise appropriate control measures to mitigate the risks identified in this risk assessment as applicable.

Indicator	Recommended control measures
1.1 Land tenure and management rights	N/A
1.2 Concession licenses	N/A
1.3 Management and harvesting planning	N/A
1.4 Harvesting permits	<p>Although it seems that the system of harvesting permits is in place and implemented there are a few doubts that causes a pre-cautionary approach. Potential issues are: a conflict of interest with registered experts (all the work in the process can be done by 1 person), 30% of the forests are without an FMP and fuelwood can be harvested without permit on private lands. Another doubt is that there is no public data about illegal logging and inspection results. We could thus not assess if the permit system in place is actually well enforced and working. As most State forest are FSC certified there is reason enough to believe that a potential problem can only be expected with private forests.</p> <p>1) When buying from private forests: Ask for valid FMP + annual operating plan. If these are not available there are two solutions:</p> <p>a) Do not buy from these private forests.</p> <p>b) Request the harvesting permit. And request an independent environmental impact assessment from the owner. This is not required by law (only in Natura2000 sites such should be available anyway) but gives you a complete picture of the risks. Such an assessment should take into account all 6 HCV categories. If this document shows that there are no risks to HCVs you can buy from this forests. Store this document in your files.</p> <p>2) It is best not to buy fire/fuelwood from private forests. Such wood cannot enter the market because its for private consumption only.</p>
1.5 Payment of royalties and harvesting fees	N/A
1.6 Value added taxes and other sales taxes	N/A
1.7 Income and profit taxes	N/A
1.8 Timber harvesting regulations	<p>Although it seems that the system of harvesting regulations is in place and implemented there are a few doubts that justify the use of the pre-cautionary approach. The main doubt is that there is no public data about illegal logging and inspection results. We could thus not assess if the harvesting regulations in place is actually well enforced and working. As most State forest are FSC certified there is reason enough to believe that a potential problem can only be expected with private forest owners.</p> <p>When buying from private forests do the following:</p> <p>1 Ask for the harvesting permit.</p>

Indicator	Recommended control measures
	<p>2 Ask for the license of the licensed engineers, experts and contractor that are working. Do not buy from people without a registered license.</p> <p>3 Do a field inspection to see what the situation is in the field when compared to the required legislations (read indicator 1.8 what details to check).</p>
1.9 Protected sites and species	<p>Almost all state forests managed by CF Ltd is FSC certified (96,6% of all state owned forests), which is a guarantee by itself because it means that almost 76% of the forest in Croatia is well managed. However, a part of the private owners (30%) does not have Forest Management Plans in place. Here we should take the pre-cautionary approach because there is no strict guarantee that HCV's are not harmed.</p> <p>1) When buying from private forests ask for valid FMP + annual operating plan. If these are not available there are two solutions:</p> <ul style="list-style-type: none"> • Do not buy from these private forests. • Request the harvesting permit. And request an independent environmental impact assessment from the owner. This is not required by law but gives you a complete picture of the risks. Such an assessment should take into account all 6 HCV indicators. If this document shows that there are no risks to HCV you can buy from this forests. Store this document in your files. <p>2) It is best not to buy fire/fuelwood from private forests. Such wood cannot enter the market because its for private consumption only.</p>
1.10 Environmental requirements	<p>Specified risk with private forests without an FMP. Without an FMP there is no way to guarantee that there is no damage done as many environmental issues are prescribed and regulated throughout the FMP.</p> <p>1) When buying from private forests ask for valid FMP + annual operating plan. If these are not available there are two solutions:</p> <ul style="list-style-type: none"> • Do not buy from these private forests. • Request the harvesting permit. And request an independent environmental impact assessment from the owner. This is not required by law but gives you a complete picture of the risks. Such an assessment should take into account all 6 HCV indicators. If this document shows that there are no risks to HCV you can buy from this forests. Store this document in your files. <p>2) It is best not to buy fire/fuelwood from private forests. Such wood cannot enter the market because its for private consumption only.</p>
1.11 Health and safety	<p>Specified risk is with <u>private forests</u> because private owners manage their own forests without safety requirements and there is no special regulation in place. Such owners do not have a chain saw licence for harvesting and are not wearing personal safety equipment in many cases.</p> <p>Only work for with 'registered operators' that have the required licenses in place. If you buy from private forest owners you need to know who is working in the forest. Actions:</p> <ol style="list-style-type: none"> a) Ask for the name of the registered operators that will work in the forest, and ask for their license. b) If such license is not available do not buy. c) When doubtful don't hesitate to inspect the field, also on the use of H&S equipment.

Indicator	Recommended control measures
1.12 Legal employment	<p>Private forests: It cannot be checked if the labour conditions (no employment contracts available because both parties involved does not see the need to draft one) with people working in the private forest are always according to the regulations. This is especially unclear for non-registered forest operators that are working in private forests lands or neighbours helping each other. Non-registered forest operators are in fact often private forest owners that are doing business as natural persons. There is not enough evidence publically available to draw a clear conclusion. Therefore, we need to apply the precautionary approach and issue a specified risk for private forest owners.</p> <p>State forests are low risk.</p> <p>When buying from private forests:</p> <ol style="list-style-type: none"> 1 Ask for the license of the licensed engineers, experts and contractor that are working. Do not buy from people without a registered license. 2 Request the labour contracts from people working in the field if you still have doubts, even when people are licensed. 3 Carry out a field visit to see who is actually working in the field, and if these people have labour contracts and are licensed.
1.13 Customary rights	N/A
1.14 Free prior and informed consent	N/A
1.15 Indigenous people's rights	N/A
1.16 Classification of species, quantities, qualities	N/A
1.17 Trade and transport	N/A
1.18 Offshore trading and transfer pricing	N/A
1.19 Custom regulations	N/A
1.20 CITES	N/A
1.21 Legislation requiring due diligence/due care procedures	N/A

Controlled wood category 2: Wood harvested in violation of traditional and human rights

Risk assessment

Indicator	Sources of Information	Functional scale	Risk designation and determination
<p>2.1. The forest sector is not associated with violent armed conflict, including that which threatens national or regional security and/or linked to military control.</p>	<p>The sources used are the required ones as advised by the NRA framework. Additional sources are also used. We advise the reader to read the detailed analysis below, which lists all sources used.</p> <p>Local expert Kristina Klarić, University of Zagreb, Faculty of Forestry, was assisting with the development of this indicator.</p>	<p>Country</p>	<p>Low risk</p> <p>The Republic of Croatia is not in armed conflict since 1995 when the Croatian war of independence finished and there is no conflict timber. Croatia is not mentioned in the category of countries with the UN Security Council ban on timber export, or any ban on timber export. Croatia stands very high in global peace index (GPI) and it is expected to go up. (http://visionofhumanity.org/app/uploads/2018/06/Global-Peace-Index-2018-2.pdf). Furthermore, regarding GPI, Croatia is among the eight largest improvers in 2018 and improvements in safety and security are made while a decline in external conflicts is realized. Improvements in the levels of political terror and external conflicts fought are also secured.</p> <p>No further sources are concluding any risks in relation to the requirements covered by this indicator. The consulted local expert also declared this indicator as low risk.</p> <p>The following 'low risk' thresholds apply:</p> <p>(1) The area under assessment is not a source of conflict timber¹; AND (2) The country is not covered by a UN security ban on exporting timber; AND (3) The country is not covered by any other international ban on timber export; AND (4) Operators in the area under assessment are not involved in conflict timber supply/trade; AND (5) Other available evidence does not challenge 'low risk' designation.</p>
<p>2.2. Labour rights are respected including rights as specified in ILO Fundamental Principles and Rights at work.</p>	<p>The sources used are the required ones as advised by the NRA framework. Additional sources are also used. We advise the reader to read the detailed analyses below, which lists all sources used. A list with laws and regulations is also included.</p>	<p>Country</p>	<p>Low risk</p> <p>Labour law regulates labour rights in Croatia. As EU member Croatia implements all relevant legislation in accordance with EU legislation, enforced through legislative institutions of the state, and controlled by NGO's. Applicable legislation for Croatia covers the key principles recognized in the ILO Fundamental Principles and Rights at Work (freedom of association and right to collective bargaining; elimination of forced and compulsory labour; eliminations of discrimination in respect of employment and occupation; and effective abolition of child labour). Croatia has ratified 60 ILO Conventions and 1 Protocol, of which Croatia has ratified 8 of 8 ILO's Fundamental Conventions.</p>

¹ "Conflict timber" limited to include "timber that has been traded at some point in the chain of custody by armed groups, be they rebel factions or regular soldiers, or by a civilian administration involved in armed conflict or its representatives, either to perpetuate conflict or take advantage of conflict situations for personal gain - conflict timber is not necessarily illegal. Please refer to FSC-PRO-60-002a V1-0.

Indicator	Sources of Information	Functional scale	Risk designation and determination
	Local expert Kristina Klarić, University of Zagreb, Faculty of Forestry, was assisting with the development of this indicator.		<p>No further sources are concluding any risks in relation to the requirements covered by this indicator. The consulted local expert also declared this indicator as low risk.</p> <p>The following 'low risk' thresholds apply: (10) Applicable legislation for the area under assessment covers all ILO Fundamental Principles and Rights at Work, AND the risk assessment for the relevant indicator5s of Category 1 confirms enforcement of applicable legislation ('low risk'); AND (12) Other available evidence does not challenge a 'low risk' designation.</p>
2.3. The rights of Indigenous and Traditional Peoples are upheld.	<p>The sources used are the required ones as advised by the NRA framework. Additional sources are also used. We advise the reader to read the detailed analyses below, which lists all sources used.</p> <p>Local expert Kristina Klarić, University of Zagreb, Faculty of Forestry, was assisting with the development of this indicator.</p>	Country	<p>Low risk</p> <p>There are no Indigenous or Tribal Peoples recognized by ILO (or other international) definitions in Croatia. Croatia did not ratify the Indigenous and Tribal Peoples Convention of 1989 (No. 169) because there are no IPs present. As member of the EU, Croatia supports the Rights of Indigenous Peoples through the UNDRIP- United Nations Declaration on the Rights of Indigenous Peoples. As there is no presence of IP/TP in Croatia there is no violations of legal and customary rights. As there is no presence of IP/TP in Croatia there are no conflicts on this issue.</p> <p>International sources and the local expert declared that Indigenous and Traditional Peoples do not exist in Croatia. No further sources are concluding any other risks in relation to the requirements covered by this indicator. The consulted local expert also declared this indicator as low risk.</p> <p>The following 'low risk' thresholds apply: (16) There is no evidence leading to a conclusion of presence of indigenous and/or traditional peoples in the area under assessment; AND (19) There is no evidence of conflict(s) of substantial magnitude pertaining to rights of indigenous and/or traditional peoples; AND (21) Other available evidence do not challenge a 'low risk' designation.</p>

Recommended control measures

Indicator	Recommended control measures
2.1	N/A
2.2	N/A
2.3	N/A

Detailed analysis of sources of information and evidences

Sources of information	Evidence	Scale of risk assessment	Guidance for risk indication ²																												
Context (the following are indicators that help to contextualize the information from other sources) <ul style="list-style-type: none"> Searching for data on: level of corruption, governance, lawlessness, fragility of the State, freedom of journalism, freedom of speech, peace, human rights, armed or violent conflicts by or in the country, etc. 																															
World Bank: Worldwide Governance Indicators - the WGI report aggregate and individual governance indicators for 215 countries (most recently for 1996–2017), for six dimensions of governance: Voice and Accountability; Political Stability and Absence of Violence; Government Effectiveness ; Regulatory Quality; Rule of Law; Control of Corruption, website 2019. These indicators are based on several hundred variables obtained from 31 different data sources, capturing governance perceptions as reported by survey respondents, nongovernmental organizations, commercial business information providers, and public sector organizations worldwide. http://info.worldbank.org/governance/wgi/index.aspx#home http://info.worldbank.org/governance/wgi/index.aspx#reports	Croatian values of ranges for the years 2007, 2012 and 2017 regarding six dimensions of governance are written in the table below where 0 corresponds to lowest rank and 100 corresponds to highest rank.: Voice and Accountability; Political Stability and Absence of Violence; Government Effectiveness; Regulatory Quality; Rule of Law; Control of Corruption.	country																													
	<table border="1"> <thead> <tr> <th>Indicator</th> <th>Value 2007</th> <th>Value 2012</th> <th>Value 2017</th> </tr> </thead> <tbody> <tr> <td>Violence and Accountability</td> <td>63</td> <td>65</td> <td>64</td> </tr> <tr> <td>Political Stability and Absence of violence</td> <td>67</td> <td>65</td> <td>72</td> </tr> <tr> <td>Government Effectiveness</td> <td>69</td> <td>73</td> <td>73</td> </tr> <tr> <td>Regulatory Quality</td> <td>66</td> <td>67</td> <td>69</td> </tr> <tr> <td>Rule of Law</td> <td>56</td> <td>61</td> <td>63</td> </tr> <tr> <td>Control of Corruption</td> <td>59</td> <td>60</td> <td>61</td> </tr> </tbody> </table>	Indicator	Value 2007	Value 2012	Value 2017	Violence and Accountability	63	65	64	Political Stability and Absence of violence	67	65	72	Government Effectiveness	69	73	73	Regulatory Quality	66	67	69	Rule of Law	56	61	63	Control of Corruption	59	60	61		
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World Bank, Harmonized List of Fragile Situations 2019 http://pubdocs.worldbank.org/en/892921532529834051/FCSList-FY19-Final.pdf	Croatia is not listed in Harmonized List of Fragile Situations published annually by The World Bank Group's (WBG) Fragile, Conflict and Violence Group (formally the Center on Conflict, Security and Development CCSD).	country																													
Committee to Protect Journalists: Impunity Index 2017 CPJ's Impunity Index calculates the number of unsolved journalist murders as a percentage of each country's population, website 2019. For this index, CPJ examined journalist murders that occurred between September 1 st , 2007 and August 31 st , 2017 and that remain unsolved. Only those nations with five or more unsolved cases are included on this index. https://cpj.org/reports/2017/10/impunity-index-getting-away-with-murder-killed-justice.php	Croatia is not on the list of countries where journalist security is threatened which is confirmed by 2017 Global Impunity Index.	country																													
Carleton University: Country Indicators for Foreign Policy: the Failed and Fragile States project of Carleton University examines state fragility using a combination of structural data and current event monitoring, 2017	According to methodology used by Carleton University, Croatia is placed in 35 highest ranked countries (Highly Functional (H) states). Here are placed countries that are open with good performance in A – Authority; L- Legitimacy and C-	country																													

² A risk indication is provided for each source analysed. The final, cumulative risks, are then summarized in the main risk assessment table at the start of the cat 2 assessment.

<p>According to this report, countries are categorised as Fragile (F); Brittle (B); Impoverished (I); Moderately Functional (M); Highly Functional (H) by two criterion Openness and Stability. The indicators that make up the structural data are divided into six clusters: Governance; Economics; Security and Crime; Human Development; Demography; and Environment. https://carleton.ca/cifp/wp-content/uploads/CIFP-2017-Fragility-Report.pdf</p>	<p>Capacity and with countries with the highest scores regarding openness criterion (O > 3.5) and stability criterion (S > 5). Highly functional states are those with the lowest scores of A, L and C (applied scale from 1 – 10 where 1 is the best result) and with the highest scores of O and S (applied scale from 1 – 10 where 10 is the best result).</p> <table border="1" data-bbox="922 264 1682 323"> <thead> <tr> <th>State</th> <th>A</th> <th>L</th> <th>C</th> <th>O</th> <th>S</th> </tr> </thead> <tbody> <tr> <td>Croatia</td> <td>3.35</td> <td>3.50</td> <td>3.92</td> <td>5.50</td> <td>5.36</td> </tr> </tbody> </table> <p><i>Legend: A – Authority; L- Legitimacy; C- Capacity; O – Openness; S - Stability</i></p>	State	A	L	C	O	S	Croatia	3.35	3.50	3.92	5.50	5.36		
State	A	L	C	O	S										
Croatia	3.35	3.50	3.92	5.50	5.36										
<p>Human Rights Watch, World report 2017: https://www.hrw.org/sites/default/files/world_report_download/wr2017-web.pdf Country report 2019: https://www.hrw.org/europe/central-asia/croatia</p>	<p>Croatia does not feature in World Report 2017 of Human Rights Watch.</p> <p>On Human Rights Watch Croatia is mentioned in relation to migrant’s crisis. Croatia did not allow migrants to enter in the country and asylum seekers have difficulties accessing language classes, education and employment. It is also mentioned regarding low legal capacities for people with disabilities, discrimination of ethnical minorities and Croatian judiciary has made slow progress towards accountability for war crimes.</p>	country													
<p>US AID: website, 2019 www.usaid.gov Search on website for [Croatia] + ‘human rights’ ‘conflicts’ ‘conflict timber’, 2019 For Africa and Asia also use: http://pdf.usaid.gov/pdf_docs/pnact462.pdf</p>	<p>These documents contain no information that leads to a specified risk indication after searching Croatia + ‘human rights’ ‘conflicts’ ‘timber conflicts’</p>	country													
<p>Global Witness: website, 2019 www.globalwitness.org Search on website for [country] + ‘human rights’ ‘conflicts’ ‘conflict timber’</p>	<p>These documents contain no information that leads to a specified risk indication after searching Croatia + ‘human rights’ ‘conflicts’ ‘timber conflicts’</p>	country													
<p>WWF: website 2019, concerning the illegal logging http://wwf.panda.org/our_work/forests/forest_publications_news_and_reports/</p>	<p>Croatia is not mentioned in articles about illegal logging.</p>	country													
<p>WWF: publication Failing the Forests Europe’s illegal timber trade, 2019 http://d2ouvy59p0dg6k.cloudfront.net/downloads/failingforests.pdf</p>	<p>Croatia is not mentioned as importer of wood from problematic supplying regions as shown in the report.</p>	country													
<p>Transparency International: Corruption Perceptions Index (CPI) 2018 https://www.transparency.org/cpi2018</p>	<p>Corruption Perceptions Index a country/territory’s score indicates the perceived level of public sector corruption on a scale of 0-100, where 0 means that a country is perceived as highly corrupt and a 100 means that a country is perceived as very clean. On the Corruption Perceptions Index 2018 on a scale from 0 (highly corrupt) to 100 (very clean) Croatia scores 48 points and ranks 60th out of 176 countries.</p>	country													

	<p>According to FSC directive (FSC-DIR-40-005) this indicator can be considered as low risk only if the Corruption Perception Index (CPI) for the given country is equal to or above 50. This is not the case for Croatia and on top of that there is a downwards trend for the last year.</p> <table border="1" data-bbox="920 236 1794 296"> <thead> <tr> <th>Year</th> <th>2012</th> <th>2013</th> <th>2014</th> <th>2015</th> <th>2016</th> <th>2017</th> <th>2018</th> </tr> </thead> <tbody> <tr> <td>Rank</td> <td>46</td> <td>48</td> <td>48</td> <td>51</td> <td>49</td> <td>49</td> <td>48</td> </tr> </tbody> </table>	Year	2012	2013	2014	2015	2016	2017	2018	Rank	46	48	48	51	49	49	48		
Year	2012	2013	2014	2015	2016	2017	2018												
Rank	46	48	48	51	49	49	48												
<p>Chatham House, Illegal Logging Indicators Country Report Card 2019 http://www.illegal-logging.info</p> <p>Regional news source.https://www.illegal-logging.info/search?query=croatia&field_term_author_name=&from%5Bdate%5D=&to%5Bdate%5D=&field_region=All</p> <p>Country page https://www.illegal-logging.info/regions/Croatia</p>	<p>On illegal logging portal for country Croatia it is written that the country's forest cover has been expanding gradually, at an annual rate of 0.2% over the period 1990-2015 (FAO, 2015) and that Illegal logging is not a significant problem in the country. As an EU Member State, Croatia is required to implement the EU Timber Regulation, which came into force in March 2013.</p> <p>There are only two articles found with regards to Croatia, and these two relate to conference announcements only.</p>	country																	
<p>Amnesty International: Annual Report 2017: The state of the world's human rights -information on key human rights issues, including: freedom of expression; international justice; corporate accountability; the death penalty; and reproductive rights https://www.amnesty.org/en/documents/POL10/6700/2018/En/</p>	<p>No information on conflict timber related to Croatia found. Statement made in the report:</p> <p><i>'Discrimination against ethnic and sexual minorities persisted. Refugees and migrants entering irregularly were returned without access to an effective asylum process. Croatia accepted less than a 10th of the refugees and asylum-seekers it had committed to relocate and resettle under EU schemes. Access to abortion remained restricted.'</i></p>	country																	
<p>Fund for Peace:The Fragile State Index (formerly Failed States Index) 2018.</p> <p>Is an index calculated by the Fund for Peace, which is a US-based non-profit research and educational organization that works to prevent violent conflict and promote security. The Failed States Index is an annual ranking, first published in 2005, of 178 nations based on their levels of stability and capacity. http://fundforpeace.org/fsi/2018/04/19/fragile-states-index-2018-issues-of-fragility-touch-the-worlds-richest-and-most-developed-countries-in-2018/</p>	<p>Croatia is ranked among "stable" countries in The Fragile State Index 2018. It is ranked 138th of 178 countries where 1st place is given the most failed state.</p>	country																	
<p>Institute for Economics & Peace: The Global Peace Index. 2018. Published by the Institute for Economics & Peace, This index is the world's leading measure of national peacefulness. It ranks 162 nations according to their absence of violence. It's made up of 23 indicators, ranging from a nation's level of military expenditure to its relations with neighbouring countries and the level of respect for human rights. http://visionofhumanity.org/app/uploads/2018/06/Global-Peace-Index-2018-2.pdf</p>	<p>Croatia stands very high (on 27th place where 1st place is the highest rank) in global peace index (GPI) and it is expected to go up. Compared to previous year it rose up for four places. It is highlighted as one of the eight countries with largest improvements.</p>	country																	

Additional sources of information (These sources were partly found by Googling the terms '[country]', 'timber', 'conflict', 'illegal logging')	Evidence	Scale of risk assessment	Risk indication
No other sources found			
From NRA: Info on illegal logging	Not available		
Conclusion on country context: Croatia scores positive on all indicators reviewed in this context section. It is ranked relatively high on all relevant aspects such as stable country, with good governance, absence of conflicts of any magnitude and it is a free country for all its citizens with a good justice system.			
Indicator 2.1. The forest sector is not associated with violent armed conflict, including that which threatens national or regional security and/or linked to military control.			
Guidance <ul style="list-style-type: none"> • Is the country covered by a UN security ban on exporting timber? • Is the country covered by any other international ban on timber export? • Are there individuals or entities involved in the forest sector that are facing UN sanctions? 			
Compendium of United Nations Security Council: Sanctions Lists 2019. https://scsanctions.un.org/fop/fop?xml=htdocs/resources/xml/en/consolidated.xml&xslt=htdocs/resources/xsl/en/consolidated.xsl	There is no UN Security Council ban on timber exports from Croatia.	country	Low risk
US AID: website 2019. https://www.usaid.gov/site-search/croatia Search on website for 'Croatia' + 'human rights' 'conflicts' 'conflict timber'	Croatia is not covered by any other international ban on timber export.		
United nations, website 2019. https://www.un.org/securitycouncil/sanctions/information	There are no individuals or entities involved in the forest sector in Croatia that are facing UN sanctions.		
US Bureau of Industry and Security works on national security, foreign policy, and economic objectives by ensuring an effective export control and treaty compliance system, website 2019. https://www.bis.doc.gov/index.php/regulations Search on website for 'Croatia' + 'human rights' 'conflicts' 'conflict timber' 'bans'	No ban for Croatia concerning timber export in that database.	country	Low risk
US Immigration and Customs Enforcement works on Immigration enforcement, Investigating Illegal Movement of People and Goods and Preventing Terrorism, website 2019. https://www.ice.gov/news/overview Search on website for 'Croatia' + 'human rights' 'conflicts' 'conflict timber' 'bans'	No articles related to bans or sanctions for Croatia with regards to timber export in that database.	country	Low risk
U.S. Department of the Treasury: OFAC bans 2019	The Office of Foreign Assets Control (OFAC) of the US Department of the Treasury administers and enforces economic and trade sanctions based on US	country	Low risk

https://www.treasury.gov/resource-center/sanctions/Programs/pages/balkans.aspx	foreign policy and national security goals against targeted foreign countries and regimes, terrorists, international narcotics traffickers, those engaged in activities related to the proliferation of weapons of mass destruction, and other threats to the national security, foreign policy or economy of the United States. No ban for Croatia with regards to timber export in that database.		
U.S. Department of State, Directorate of Defense Trade Controls: website ITAR bans, 2019. The ITAR sets out the requirements for licenses or other authorizations for specific exports of defence articles and services. https://www.pmddtc.state.gov/?id=ddtc_kb_article_page&sys_id=24d528fd5bfc930044f9ff621f961987	The International Traffic in Arms Regulations ("ITAR," 22 CFR 120-130) implements the Arms Export Control Act (AECA). These regulations are regularly updated and revised to reflect change in the international political and security climate, as well as technological development. No ban for Croatia with regards to timber export in that database.	country	Low risk
EU: EU sanctions, 2019. https://eeas.europa.eu/headquarters/headquarters-homepage_en/8442/Consolidated%20list%20of%20sanctions	No special sanction for Croatia with regards to timber export in that database.	country	Low risk
From NRA	Not available	-	-
Guidance <ul style="list-style-type: none"> • Is the country a source of conflict timber? If so, is it at the country level or only an issue in specific regions? If so – which regions? • Is the conflict timber related to specific entities? If so, which entities or types of entities? 			
USAID, website 2019 www.usaid.gov http://pdf.usaid.gov/pdf_docs/pnact462.pdf Conflict Timber is defined by US AID as: - conflict financed or sustained through the harvest and sale of timber (Type 1), - conflict emerging as a result of competition over timber or other forest resources (Type 2) Also check overlap with indicator 2.3	These documents contain no information that lead to a specified risk indication after searching Croatia + 'conflicts' 'timber conflicts'	country	Low risk
Global Witness: website, 2019. GW is an independent, not-for-profit NGO campaigning to end environmental and human rights abuses driven by the exploitation of natural resources and corruption, by hard-hitting investigations, exposure of abuses, and campaign for change. www.globalwitness.org/campaigns/environment/forests	These documents contain no information that lead to a specified risk indication after searching Croatia + 'conflicts' 'timber conflicts'	country	Low risk
Human Rights Watch, website 2019. http://www.hrw.org/	These documents contain no information that lead to a specified risk indication after searching Croatia + 'conflicts' 'timber conflicts'	country	Low risk
Amnesty International, Annual Report, 2019.	No information on conflict timber related to Croatia found.	country	Low risk

<p>The state of the world's human rights -information on key human rights issues, including: freedom of expression; international justice; corporate accountability; the death penalty; and reproductive rights http://www.amnesty.org/en/annual-report/2011 ; http://amnesty.org/en/annual-report/2013/</p>																															
<p>World Bank: Worldwide Governance Indicators, website 2019.</p> <p>The WGI's report aggregate and individual governance indicators for 213 economies (most recently for 1996–2012), for six dimensions of governance: Voice and Accountability; Political Stability and Absence of Violence; Government Effectiveness; Regulatory Quality; Rule of Law; Control of Corruption</p> <p>http://info.worldbank.org/governance/wgi/index.aspx#reports</p> <p>The 'Political Stability and Absence of Violence/Terrorism' measures perceptions of the likelihood of political instability and/or politically motivated violence, including terrorism. By measuring individual variables from each data source used to construct this measure in the Worldwide Governance Indicators</p>	<p>According to the last available data for 2017 Croatia is in 50-75th percentile range regarding six dimensions of governance: Voice and Accountability; Political Stability and Absence of Violence; Government Effectiveness; Regulatory Quality; Rule of Law; Control of Corruption.</p> <p>Croatian values of ranges for the years 2007, 2012 and 2017 regarding six dimensions of governance are written in table below where 0 corresponds to lowest rank and 100 corresponds to highest rank.: Voice and Accountability; Political Stability and Absence of Violence; Government Effectiveness; Regulatory Quality; Rule of Law; Control of Corruption. Values are slightly improving.</p> <table border="1" data-bbox="922 544 1803 775"> <thead> <tr> <th>Indicator</th> <th>Value 2007</th> <th>Value 2012</th> <th>Value 2017</th> </tr> </thead> <tbody> <tr> <td>Violence and Accountability</td> <td>63</td> <td>65</td> <td>64</td> </tr> <tr> <td>Political Stability and Absence of violence</td> <td>67</td> <td>65</td> <td>72</td> </tr> <tr> <td>Government Effectiveness</td> <td>69</td> <td>73</td> <td>73</td> </tr> <tr> <td>Regulatory Quality</td> <td>66</td> <td>67</td> <td>69</td> </tr> <tr> <td>Rule of Law</td> <td>56</td> <td>61</td> <td>63</td> </tr> <tr> <td>Control of Corruption</td> <td>59</td> <td>60</td> <td>61</td> </tr> </tbody> </table>	Indicator	Value 2007	Value 2012	Value 2017	Violence and Accountability	63	65	64	Political Stability and Absence of violence	67	65	72	Government Effectiveness	69	73	73	Regulatory Quality	66	67	69	Rule of Law	56	61	63	Control of Corruption	59	60	61	country	Low risk
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<p>Greenpeace, website 2019. www.greenpeace.org Search for 'conflict timber [country]'</p>	No information on conflict timber related to Croatia found.	country	Low risk																												
<p>CIFOR, website, 2019. http://www.cifor.org/;</p> <p>Factsheet about forest conflicts http://www.cifor.org/publications/Corporate/FactSheet/forests_conflict.htm</p>	Croatia is not mentioned in this document about <i>Forests and conflict</i> .	country	Low risk																												
<p>Google the terms '[country]' and one of following terms or in combination 'conflict timber', 'illegal logging'</p> <p>From NRA</p>	No information found on Croatia as a source of conflict timber	country	Low risk																												
<p>Conclusion</p> <p>With regards to indicator 2.1 there are no risks related to conflict timber in Croatia. None of the consulted sources revealed any indications on this regard. . We could therefore believe that the forest sector is not associated with violent armed conflict, including that which threatens national or regional security and/or linked to military control. No further evidences were found from national and international sources that contradict a low risk conclusion. The consulted local expert also declared this indicator as low risk.</p> <p>The following 'low risk' thresholds apply:</p>																															

- (1) The area under assessment is not a source of conflict timber³; AND
- (2) The country is not covered by a UN security ban on exporting timber; AND
- (3) The country is not covered by any other international ban on timber export; AND
- (4) Operators in the area under assessment are not involved in conflict timber supply/trade; AND
- (5) Other available evidence does not challenge 'low risk' designation.

Indicator 2.2. Labour rights are respected including rights as specified in ILO Fundamental Principles and Rights at work.

Guidance

- Are the social rights covered by the relevant legislation and enforced in the country or area concerned? (refer to category 1)
- Are rights like freedom of association and collective bargaining upheld?
- Is there evidence confirming absence of compulsory and/or forced labour?
- Is there evidence confirming absence of discrimination in respect of employment and/or occupation, and/or gender?
- Is there evidence confirming absence of child labour?
- Is the country signatory to the relevant ILO Conventions?
- Is there evidence that any groups (including women) feel adequately protected related to the rights mentioned above?
- Are any violations of labour rights limited to specific sectors?

<p>ILO: Status of ratification of fundamental ILO conventions 2019. http://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102700 COUNTRY_ID:102700 Fundamental Conventions</p> <ul style="list-style-type: none"> • C029 - Forced Labour Convention, 1930 (No. 29), from 08 Oct 1991 in Force • C087 - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87), from 08 Oct 1991 in Force • C098 - Right to Organise and Collective Bargaining Convention, 1949 (No. 98), from 08 Oct 1991 in Force • C100 - Equal Remuneration Convention, 1951 (No. 100), from 08 Oct 1991 in Force • C105 - Abolition of Forced Labour Convention, 1957 (No. 105), from 08 Oct 1991 in Force • C111 - Discrimination (Employment and Occupation) Convention, 1958 (No. 111), from 08 Oct 1991 in Force • C138 - Minimum Age Convention, 1973 (No. 138) • Minimum age specified: 15 years, from 08 Oct 1991 in Force • C182 - Worst Forms of Child Labour Convention, 1999 (No. 182), from 17 Jul 2001 in Force <p>Governance (Priority):</p> <ul style="list-style-type: none"> • C081 - Labour Inspection Convention, 1947 (No. 81) , from 08 Oct 1991 in Force 	<p>Croatia has ratified 60 ILO Conventions and 1 Protocol as it is specified below:</p> <ul style="list-style-type: none"> • Fundamental Conventions: 8 of 8 • Governance Conventions (Priority): 3 of 4 • Technical Conventions: 49 of 177 • Out of 60 Conventions and 1 Protocol ratified by Croatia, of which 45 are in force, 14 Conventions have been denounced; none have been ratified in the past 12 months. <p>Croatia has ratified 8 of 8 ILO's Fundamental Conventions.</p> <p>Regarding Minimum Age Convention, minimum age specified is 15 years.</p> <p>Most of fundamental conventions are ratified in 1991 except C182 Worst Forms of Child Labour Convention that entered into force by ILO in November 2000 and it is ratified by Croatia in July 2001.</p>	<p>country</p>	<p>Low risk</p>
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³ "Conflict timber" limited to include "timber that has been traded at some point in the chain of custody by armed groups, be they rebel factions or regular soldiers, or by a civilian administration involved in armed conflict or its representatives, either to perpetuate conflict or take advantage of conflict situations for personal gain - conflict timber is not necessarily illegal. Please refer to FSC-PRO-60-002a V1-0.

<ul style="list-style-type: none"> • C122 - Employment Policy Convention, 1964 (No. 122), from 08 Oct 1991 in Force • C129 - Labour Inspection (Agriculture) Convention, 1969 (No. 129), from 08 Oct 1991 in Force 			
<p>ILO: NATLEX 2019. Database of national labour, social security and related human rights legislation database that covers over 88,000 records covering 196 countries and over 160 territories and subdivisions; records provide full texts or abstracts of legislation and citation information; records are indexed by subject classifications; records appears in only one of the three ILO official languages (English/French/Spanish); full text of the law or a relevant electronic source is linked to the record.</p> <p>http://www.ilo.org/dyn/natlex/natlex4.countrySubjects?p_lang=en&p_country=HRV</p>	<ul style="list-style-type: none"> • General provisions(-) (118) <ul style="list-style-type: none"> ○ Constitutional law (14) ○ Labour codes, general labour and employment acts (8) ○ Civil, commercial and family law (30) ○ Criminal and penal law (24) ○ Human rights (18) ○ Economic and social policy (17) • Freedom of association, collective bargaining and industrial relations (8) • Elimination of forced labour (2) • Elimination of child labour, protection of children and young persons (7) <ul style="list-style-type: none"> ○ Hazardous child labour (1) • Equality of opportunity and treatment (22) <ul style="list-style-type: none"> ○ Non-discrimination (4) ○ Workers with family responsibilities (12) • Tripartite consultations (2) • Labour administration (11) <ul style="list-style-type: none"> ○ Labour inspection (9) • Employment policy, promotion of employment and employment services (50) <ul style="list-style-type: none"> ○ Disabled workers (21) • Education, vocational guidance and training (15) • Cooperatives (4) • Conditions of employment (9) <ul style="list-style-type: none"> ○ Wages (6) ○ Personnel management (1) • Conditions of work(-) (2) <ul style="list-style-type: none"> ○ Hours of work, weekly rest and paid leave (2) • Occupational safety and health(-) (71) <ul style="list-style-type: none"> ○ Protection against particular hazards (32) ○ Protection in certain sectors of economic activity (7) • Social security (general standards)(-) (186) <ul style="list-style-type: none"> ○ Medical care and sickness benefit (103) ○ Old-age, invalidity and survivors benefit (36) ○ Employment accident and occupational disease benefit (6) ○ Unemployment benefit (5) ○ Social assistance and services (3) ○ Administration and financing (21) • Maternity protection (20) • Migrant workers (24) 	country	Low risk

	<ul style="list-style-type: none"> • Seafarers(-) (41) • Fishers (3) • Dock workers (1) • Specific categories of workers(-) (53) • International agreements(-) (43) <ul style="list-style-type: none"> ◦ International social security agreements (35) • Other international agreements (7) 		
<p>ILO-LEGOSH: Occupational Safety and Health (OSH) 2019.</p> <p>The ILO Global Database on Occupational Safety and Health Legislation (LEGOSH) provides a picture of the regulatory framework of the main elements of OSH legislation, including OSH management and administration, employers' duties and obligations, workers' rights and duties, OSH inspection and enforcement, among others. LEGOSH classification structure is based on a comprehensive set of 11 themes which follows and captures the main part of the key ILO standards such as the ILO Convention No.155 on Occupational Safety and Health (1981) and the Recommendation N°164, Convention No.187 on the Promotional framework for occupational safety and health (2006), the Labour Inspection Convention C081 and other technical Conventions as benchmarks.</p> <p>http://www.ilo.org/dyn/legosh/en/f?p=14100:1100:0::NO:1100:P1100_ISO_CODE3,P1100_YEAR:HR.:NO</p> <p>Croatia's constitution of 1991 with amendments through 2010.</p> <p>https://www.constituteproject.org/constitution/Croatia_2010.pdf?lang=en</p> <p>Act on occupational health and safety 2014 odlukuo proglašenju zakona o zaštiti na radu (NN 71/14, 118/14, 154/14 , 94/18, 96/18)</p> <p>http://www.ilo.org/dyn/natlex/docs/ELECTRONIC/99295/118452/F6659738/HRV-2014-L-99295.pdf</p> <p>Croatian Institute Of Public Health - Department Of Occupational Health : 2019</p> <p>http://hzzsr.hr/index.php/porefesionalne-bolesti-i-ozljede-na-raduo/ozljede-na-raduo/ozljede-na-raduo-u-hrvatskoj/</p>	<p>The OSH Law recognises the importance of a person's life, health and ability to work as values bearing special social interest in the Republic of Croatia. It is divided into chapters regulating rules for protection at work and general principles of prevention; employer's obligations in implementing rules on safety at work while focusing attention on organisation and implementation of safety at work, liability for damages at work and in connection with work, vocational training, consultations, jobs with special working conditions, particularly sensitive workgroups, means of work, personal protection equipment, technology of work and working procedures, working environment, stress at work or in connection to work, safety signs, written information and instructions, foreign workers; obligations and rights of workers; workers' commissioner for safety at work; activities with regards to safety at work; supervision; misdemeanour provisions; transitional and final provisions. At the same time, there are numerous specific legal acts such as rules of procedure laws and regulations that are containing legal norms regulating health and safety of workers regarding specific jobs they are doing.</p> <p>Croatian Institute for Health Protection and Safety at Work is an independent health institution at national level working under supervision of the Ministry of Health.</p> <ul style="list-style-type: none"> • Constitution of the Republic of Croatia (Text No. 2422) (Consolidated text). (Articles 55(1), 59, 65(3), 70) • Act of 5 June 2014 on Occupational Safety (Text No. 1334). (Articles 1, 5) <p>Health and safety covers physical and psychological health (Act of 5 June 2014 on Occupational safety (Text No. 1334). (Articles 13(2)(3)))</p> <p>A worker is a natural person who, in employment, carries out certain tasks for the employer. A term "worker" covers of particular categories of workers: Migrant workers; Domestic workers; Home workers; Self-employed persons.</p> <p>(Act of 5 June 2014 on Occupational safety (Text No. 1334). (Articles 8(1), 4))</p> <p>Institutions and programmes relating to OSH administration and/or enforcement - Government of the Republic of Croatia is a competent national authority for safety and health at work with the Ministry of the Labour and Pension System as the main administrative body for OSH. For those purposes, National Council for Work Safety is established by the Government of the Republic of Croatia as its advisory</p>	country	Low risk

	<p>body for occupational health and safety. (Act of 5 June 2014 on Occupational safety (Text No. 1334). (Articles 6(1)); The Decision on the Establishment of the National Council for Occupational safety and health 20141010 (§ V, VII))</p> <p>Employers' duties and responsibilities to protect the safety and health of workers and others. Employers' have duty to ensure the health and safety of their employees (Act of 5 June 2014 on Occupational safety (Text No. 1334). (Articles 17 and 19)), people other than their own employees (Act of 5 June 2014 on Occupational safety (Text No. 1334). (Article 18)), collaborate with one or more employers at the same workplace (Act of 5 June 2014 on Occupational safety (Text No. 1334). (Articles 20, 76)), duty of surveillance of workers' health in relation to work (Act of 5 June 2014 on Occupational safety (Text No. 1334). (Articles 36, 63, 80)),, working environment and working practices (Act of 5 June 2014 on Occupational safety (Text No. 1334). (Art 41)), duty to provide personal protective equipment (Act of 5 June 2014 on Occupational safety (Text No. 1334). (Art 41)), duty to ensure the usage of personal protective equipment (Act of 5 June 2014 on Occupational safety (Text No. 1334). (Art 41 and 42)), duty to provide first-aid and welfare facilities (Act of 5 June 2014 on Occupational safety (Text No. 1334). (Art 56)).</p> <p>Employers' have duty to organize prevention formally along generally accepted OSH management principles and practices. Elements of an OSH management system: Policy or plan specifying responsibilities and arrangements for health and safety; Appointment of a person for health and safety; Written risk assessment; Safe operating work systems and procedures; Training and information on risks; Review or assessment of the results of preventive measures and Consultation with workers in health and safety. (Act of 5 June 2014 on Occupational safety (Text No. 1334). (Art 33, 82, 18, 11, 31))</p> <p>Employers' have duty to ensure availability of expertise and competence in health and safety that includes requirement to access expert advice and/or support in health and safety; appointment of an OSH practitioner (Act of 5 June 2014 on Occupational safety (Text No. 1334). (Art 20) (Ordinance on performance of occupational safety and health 20140924 (Art. 4)))</p> <p>Workers' have rights and duties: duty to take reasonable steps to protect their own safety and health; duty to take reasonable steps to protect the safety and health of others; supervisors' have duty to take reasonable steps to protect the safety and health of others; senior officers' have duty to take reasonable steps to protect the safety and health of others; self-employed persons' have duty to take reasonable steps to protect their own and other people's health and safety; employee have duty to comply with OSH-related requirements; worker have right to enquire about risks and preventive measures; employees have right to remove</p>		
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	<p>themselves from a dangerous situation and employees have right to be reassigned to non-hazard work. (Act of 5 June 2014 on Occupational safety (Text No. 1334), (Art 68, 69, 71, 24, 18, 32 and 69))</p> <p>The Law on occupational health and safety describes consultation, collaboration and co-operation with workers and their representatives (Act of 5 June 2014 on Occupational safety (Text No. 1334))</p> <p>Employers hiring employees working under different conditions of exposure hazardous conditions are obliged to apply occupational health and safety rules. Employers have duty of recording, notification and investigation of accidents/incidents and diseases. (Act of 5 June 2014 on Occupational safety (Text No. 1334))</p>		
<p>ILO-TRAVAIL, 2019.</p> <p>Working Conditions Laws Database provides a better understanding of the working conditions of domestic workers, which can be established by examining the coverage of labour legislation that would address these conditions. http://www.ilo.org/dyn/travail/travmain.home</p> <p>ILO: Working conditions laws report, 2012. http://www.ilo.org/wcmsp5/groups/public/---ed_protect/---protrav/---travail/documents/publication/wcms_235155.pdf</p> <p>Labour law 2017 Odbor za zakonodavstvo hrvatskoga sabora (NN 93/14, 127/17) https://narodne-novine.nn.hr/clanci/sluzbeni/full/2004_10_137_2415.html</p>	<p>Normal Weekly Working Hours Limits in Croatia is 40 hours (labour law NN 93/14, 127/17). Croatia is among the largest proportion of countries around the world has set legal weekly hour limits of 40 hours per week (36%). Among countries in Europe and the former CIS an overwhelming number of countries (69%) have established a 40 hour weekly limit.</p> <p>The ILO Hours of Work (Industry) Convention of 1919, (No. 1). ILO Convention No. 1 limited the hours of work to 8 hours a day and 48 hours per week in industrial undertakings. Maximum Weekly Working Hours in Croatia is 50 hours. Overtime limit is 10 hours per week, 180 hours per year (labour law NN 93/14, 127/17). The overtime of minors is prohibited. A pregnant woman with a child up to three years of age and a single parent with a child up to six years of age may only work overtime if she/he gives a written statement of voluntary consent to such work.</p> <p>According to Working conditions laws report 2012, the vast majority of countries have legislation that imposes some type of maximum limit on weekly working hours (75%). Two principle clusters can be identified. The first comprises countries (42%) that have legislation permitting 49 hours or more per week and the second comprises those that have legislation setting a 48 hour maximum per week (33%).</p> <p>Minimum annual leave in Croatia is 4 weeks. Croatia belongs to a sizable number of countries (43%) that have legislation providing 20 working days of leave or more (according to Working conditions laws report 2012). During the annual holiday, a worker is entitled to a salary compensation in the amount specified in a collective agreement, a work order or a labour contract, and at least in the amount of his average monthly salary over the previous three months (including all cash benefits and remuneration) (Labour law NN 93/14, 127/17). The ILO standard on this issue is the Holidays with Pay (Revised), 1970 (No. 132) Convention. This</p>	country	Low risk

	<p>international standard establishes the right of every person to whom it applies to an annual paid leave of at least 3 working weeks for every one year of service.</p> <p>Duration of maternity leave is 45 days before delivery and 1 year after. Maternity leave benefits for Croatia is full pay for at least 14 weeks and it is founded by public funds. Amount of maternity leave benefits 100% from 28 days before to 6 months after birth; a flat rate for the remainder of the leave period. Source of maternity leave benefits: Social insurance (up to 6 months after birth)/ Public Funds (State) for the remainder. Croatia is among globally an overwhelming majority of countries (85%) that provide at least 12 weeks of maternity leave or more, in line with ILO Conventions No. 3 and No. 103. Of this group more than half (53%) stipulate more than 14 weeks of maternity leave as stipulated in ILO Convention No. 183.</p>		
<p>Minimum wage act 2018 Uredba o minimalnoj plaći (OG 109/18) https://narodne-novine.nn.hr/clanci/sluzbeni/2018_12_109_2093.html</p> <p>Regulation on the amount of the minimum wage in 2019 Uredbu o visini minimalne plaće (NN 109/2018) https://narodne-novine.nn.hr/clanci/sluzbeni/2018_12_109_2093.html</p>	<p>The Government defines the minimum wage. Regulation on the amount of the minimum wage in 2019 defines the minimum wage level for the period from 1 January 2019 to 31 December 2019 is determined in the gross amount of HRK 3,750.00.</p>	country	Low risk
<p>Law on representativeness of employers 'and trade unions' associations 2015 . Zakon o reprezentativnosti udruga poslodavaca i sindikata.(NN 93/14, 26/15) https://www.zakon.hr/z/740/Zakon-o-reprezentativnosti-udruga-poslodavaca-i-sindikata</p>	<p>Establishment of worker unions is defined by The Law representativeness of employer associations and trade unions (link). The level of worker union density in Croatia is around 35%, but the union movement in Croatia is characterized by dispersion of the unions, but the increasing importance is given to the social partnership between employers, unions and the government.</p>	country	Low risk
<p>ETUI, website 2019.</p> <p>Union density in Croatia https://www.worker-participation.eu/National-Industrial-Relations/Countries/Croatia/Trade-Unions</p>	<p>Union density is well above the EU average in Croatia with more than a third of employees in unions. However, union organisation is fragmented with four nationally representative union confederations and some unions outside these larger bodies, although recent legislative changes have resulted in a significant consolidation.</p> <p>Croatia has 301 national and 297 county unions.</p> <p>List of unions registered in the Ministry of Labour and Pension System is available on: https://imamopravoznati.org/request/popis_sindikata_registriranih_u The list of trade unions registered in the state administration offices in the county in the office of the City of Zagreb responsible for labour affairs is available on: http://data.gov.hr/dataset/popisi-sindikata/resource/fcc41132-944d-4839-8920-ae29075aedc1</p>	country	Low risk

	<p>Figures collected by the government in 2009 indicate that at that point Croatian unions had at least 423 964 members, equivalent to a union density of 35%, well above the EU average of around 23%.</p> <p>However, the trade union movement is fragmented (only 10 people are required to set up a trade union). An explanatory note to new legislation being introduced in 2014, states that there are 621 separate unions in the country, more than half of which (313) operate in only one of Croatia's 21 counties. In addition, there are 26 higher level union organisations (bodies made up of at least two unions), although three of these operate only in a single county.</p> <p>These higher level bodies include four union confederations which are nationally representative. In other words, they have the right to participate in the tripartite economic and social council and other tripartite national bodies (such as the national pensions fund and the employment service).</p>		
<p>Croatian Forestry Union (CFU), website 2019. http://www.hrsindsum.hr/vijesti-sindikata-sumarstva</p>	<p>In the forest sector collective bargaining is conducted through the Croatian Forestry Union (CFU). CFU is an independent, voluntary interest association of employees in the forestry and related industries.</p> <p>The basic task of CFU is to protect the economic, social and cultural interests of members who are primarily achieved by collective bargaining and concluded in Collective agreement. The organizational units of the Croatian Forestry Union are union branches. A total of 206 branches are constituted. Croatian Forestry Union is part of the Association of Independent Croatian Unions.</p> <p>The Croatian Forestry Union is recognized nationally, European and internationally. It is a member of Building and Wood Workers International - Bwi Geneva, European Federation of Building And Woodworkers - Efbww Bruxelles and actively participate in the work of UNION OF EUROPEAN FORESTERS - UEF HELSINKI.</p> <p>A valid Collective agreement is concluded in March 2018 for a period of four years (http://www.hrsindsum.hr/upload/download/kolektivni-ugov-ff5afde2.pdf). This Collective agreement for workers in forestry enables numerous benefits for workers: the benefits that have been retained from previous Collective agreement: Payment of recourse (in the amount of 50% of the average salary of the Company); Stimulation; Commemorative awards for many years of work (jubilee awards) and the holidays of Christmas and Easter; Gifts for children; Transportation to work; Subsistence allowance for field work; compensation for separate life from family, etc.</p> <p>Additionally, some new benefits are obtained that are available on: http://www.hrsindsum.hr/vijesti-sindikata-sumarstva/view/323/potpisan-novi-kolektivni-ugovor-</p>	<p>country</p>	<p>Low risk</p>

	<p>Croatian media write positively about the collective agreement for forestry workers and on the achieved numerous benefits for workers. These articles are available on following links:</p> <p>https://net.hr/danas/hrvatska/drzavna-firma-s-bajkovitim-kolektivnim-ugovorom-rastu-place-dodaci-godisnji-otpremnine-beneficije/ https://www.jutarnji.hr/vijesti/hrvatska/drzavna-firma-s-najboljim-kolektivnim-ugovorom-ima-sve-manju-dobit-a-zaposlila-cak-794-novih-ljudi-sada-ce-svi-dobiti-osjetno-veca-prava/7315416/ https://www.rtl.hr/vijesti-hr/novosti/hrvatska/2994753/drzavna-firma-s-najboljim-kolektivnim-ugovorom-godinama-posluju-negativno-ali-i-dalje-zaposljavaju-dizu-place-daju-bonuse-nema-tehnoloskog-viska/ https://www.index.hr/vijesti/clanak/hrvatske-sume-rekorderi-na-uskrsnice-ce-potrositi-okolo-9-milijuna-kuna/1034864.aspx</p>		
<p>Domestic legislation on child labour can be found in:</p> <p>Labour law 2017 Odbor za zakonodavstvo hrvatskoga sabora (NN 93/14, 127/17) https://narodne-novine.nn.hr/clanci/sluzbeni/full/2004_10_137_2415.html</p>	<p>According to Article 19 of Croatian labour law the lowest age for employment is defined. A person under the age of fifteen or a person aged between fifteen and younger than eighteen years who is still at compulsory elementary education, should not be hired (mandatory law). With this law Croatia is following ILO conventions.</p> <p>Additional note on child labour: Further reports, evidences or information about the implementation of this legislation and about child labour in general are not available. International and local media are not stating any problem in Croatia with regards to this topic. The local expert working on the CNRA is not aware of any problems either (source: local expert Kristina Klaric).</p>	country	Low risk
<p>Hrcak: Slavery and forced labour evidences, Application of Convention rights in the area of prohibition of slavery and forced labour: European standards and Croatia's achievements. Herceg Pakšić, Barbara i Miroslav Jukić. Page 23, 2016.</p> <p>https://hrcak.srce.hr/177432</p> <p>Croatia's constitution of 1991 with Amendments through 2010 (page 4). https://www.constituteproject.org/constitution/Croatia_2010.pdf?lang=en</p>	<p>Concerning the prohibition of slavery and forced labour in the Croatian criminal law, the investigation of the verdict has generally shown a good understanding of slavery, and forced labour. It should be emphasized that the Croatian Courts hold the same restrictive attitude advocated by European Court of Human Rights. The Republic of Croatia has a constitutional provision (Constitution of Republic of Croatia) prohibiting forced or compulsory labour (Article 23), but there is no direct constitutional ban on slavery. However, there are other provisions (personal and political rights) that are concerned with various rights and freedoms. For example, Art. 22 proclaims the inviolability of human freedom, and Art. 35. guarantee the protection of dignity. Economic and social rights also include the right to freedom of movement and free choice of employment (Article 54). The forest sector is not following any different practises or regulations and comply with the above (source: local expert Kristina Klaric).</p>	country	Low risk
<p>ILO Evidences of use of advisory service of ILO Decent Work Technical Support Team, 2019. https://www.ilo.org/budapest/countries-covered/lang--en/index.htm</p>	<p>The ILO Decent Work Technical Support Team and Country Office for Central and Eastern Europe provides advisory services to 18 member countries to which Croatia belongs to, that develop policies and programmes that promote more and</p>	country	Low risk

	<p>better jobs for all women and men. The work of the office focuses on the four strategic objectives of the ILO, promoting rights at work, encouraging decent and productive employment, enhancing social protection, and strengthening social dialogue.</p> <p>This support team assisted Croatia with its economic and labour market transformation and in its accession to the EU in 2013. Main areas of work included strengthening social dialogue, collective bargaining, labour law, labour dispute settlement, supporting pension reform and sustainable social security system, reviewing employment policies, promoting flexibility and security in the labour market, and orderly migration and local economic development.</p> <p>Since then the cooperation is based on specific technical requests from Croatia such as transition from the informal to the formal economy or compliance with International Labour Standards.</p>		
<p>ILO: The cost of coercion - Global Report on Forced Labour 2009. https://www.ilo.org/global/topics/forced-labour/publications/WCMS_106268/lang--en/index.htm</p>	No records on labour issues for Croatia found in this report.	country	Low risk
<p>ILO: Child Labour Country Dashboard 2019. https://www.ilo.org/ipec/Regionsandcountries/lang--en/index.htm</p>	No records on child labour found in this report.	country	Low risk
<p>Croatian Bureau of Statistics: Evidence of gender equality: Publication: Women and Men in Croatia, 2018. https://ravnopravnost.gov.hr/pristup-informacijama/strateski-i-zakonodavni-okvir-2039/strateski-i-zakonodavni-okvir-za-ravnopravnost-spolova/nacionalni-dokumenti-2063/5-statistika/2075</p>	<p>The publication entitled “Women and Men in Croatia, 2017” is the thirteenth one of this kind published by the Croatian Bureau of Statistics. The goal of the publication is to illustrate the position of men and women in our society, using up-to-date statistical indicators. Sex equality is a fundamental constitutional principle in the Republic of Croatia, according to which women and men should be equally present in all spheres of public and private life, they should have equal status, equal opportunities to exercise all their rights and equal benefit from achieved results.</p> <p>Looking at the average for 2016, 52.3 percent of the working-age population were women, while in the employed they accounted for almost half of the total number of employees, or 45.9 percent.</p> <p>The average monthly net salary of women in 2015 was 5305 kuna and was 10.9 percent lower than the average monthly net salary of men. The lowest net salaries were women employed in administrative and auxiliary services (3871 kunas) and the manufacturing industry (4427 kunas), while the highest net earnings were women employed in financial activities and insurance activities (7,351 kunas) and information and communication (7067 kunas). In two areas of activity, women had higher salaries than men, by 8.3 percent in construction and by 0.2 percent in mining and quarrying.</p> <p>Sixty percent of graduate students are women.</p>	country	Low risk

	<p>Women are also present at doctoral studies.</p> <p>At higher education institutions there are more female students. Of the total number of students enrolled in higher education institutions in the academic year 2016/2017, female students were 56.7 percent. More than two thirds of the total number of female students enrolled in higher education institutions in the field of social sciences (77.1 percent).</p>		
<p>Law on gender equality 2018 Zakon o ravnopravnosti spolova(NN 69/17) <u>https://ravnopravnost.gov.hr/UserDocsImages/dokumenti/Zakoni/2018/Zakon%20o%20ravnopravnosti%20spolova%20HRV.pdf</u></p> <p>Croatia government: Regulation of the government of the republic of Croatia on the office for gender equality 2012 uredbu o uredu za ravnopravnost spolova (OG 39/12) <u>https://narodne-novine.nn.hr/clanci/sluzbeni/2012_04_39_1002.html</u></p> <p>Croatia government: By the regulation amending the regulation on the office for gender equality 2016 Uredbu o izmjeni uredbe o uredu za ravnopravnost spolova (OG 28/16) <u>https://narodne-novine.nn.hr/clanci/sluzbeni/2016_03_28_801.html</u></p> <p>Croatia government: National policy for gender equity 2015. https://ravnopravnost.gov.hr/UserDocsImages/arhiva/images/pdf/National%20Policy%20for%20Gender%20Equality%202011-2015.pdf</p>	<p>Regulation of gender equality in Croatia is defined by Law on gender equality. The Croatian Government established the Office for Gender Equality as a professional service to perform tasks relating to the realization of gender equality. The Office for Gender Equality was established on 3 February 2004 under the Regulation of the Government of the Republic of Croatia (Official Gazette 18/04) as a professional service of the Government of the Republic of Croatia for the performance of professional and administrative affairs related to the achievement of gender equality in the Republic of Croatia. It started to work in March 2004.</p> <p>The scope of work of the Office was laid down in the Regulation of the Government of the Republic of Croatia on the Office for Gender Equality (OG 39/12) and the Regulation on Amendments to the Regulation on the Office for Gender Equality (OG 28/16) and Article 18, paragraph 2 of the Gender Equality Act.</p> <p>Since the beginning this office is responsible for everything related to gender equality. As such they provide information to stakeholder and politicians, input for national reports, organize seminars and training courses and discuss new development on international levels.</p>	country	Low risk
<p>LGBT rights in Croatia can be found in:</p> <p>Law on life partnership of persons of the same sex 2014 Odluku o proglašenju zakona o životnom partnerstvu osoba istog spola (NN 092/2014) <u>https://narodne-novine.nn.hr/clanci/sluzbeni/2014_07_92_1836.html</u></p>	<p>Lesbian, gay, bisexual, and transgender (LGBT) rights in Croatia have expanded in recent years but LGBT persons may still face some legal challenges not experienced by non-LGBT residents. Homosexuality was for the first time in Croatian history de jure criminalized in 1951 while Croatia was a federal constituent of SFR Yugoslavia. Both male and female same-sex sexual activity was legalized in Croatia in 1977 with the introduction of Croatia's own penal code. The age of consent was equalized in 1998.</p> <p>The status of same-sex relationships was first formally recognized in 2003 under a law dealing with unregistered cohabitations. As a result of a 2013 referendum, Croatia's Constitution defines marriage solely as a union between a woman and man, effectively prohibiting same-sex marriage. Nevertheless, since the introduction of the Life Partnership Act in 2014, same-sex couples have effectively enjoyed rights equal to heterosexual married couples in everything except adoption rights. However, the separate legislation does provide same-sex couples with a mechanism similar to step-child adoption called "partner-guardianship". Croatia bans all discrimination on the grounds of sexual orientation, gender identity, and gender expression.</p>	country	Low risk

	Since 2006, the country has had hate crime legislation in place which covers sexual orientation. The law was first applied in 2007, when a man who violently attacked the Zagreb Pride parade using Molotov cocktails was convicted and sentenced to 14 months in prison. On 1 January 2013 new Penal Code has been introduced with the recognition of a hate crime based on a gender identity.		
International Lesbian, Gay, Bisexual, Trans and Intersex Association (ILGA): Annual Review of the Human Rights Situation of Lesbian, Gay, Bisexual, Trans and Intersex People in Europe 2015. https://www.ilga-europe.org/sites/default/files/01_full_annual_review_updated.pdf	In 2015, the International Lesbian, Gay, Bisexual, Trans and Intersex Association (ILGA) ranked Croatia 5th in terms of LGBT rights out of 49 observed European countries, which represented an improvement compared to the previous year's position of 12th place.	country	Low risk
UN combined declaration: Ministerial Declaration on ending violence and discrimination against individuals based on their sexual orientation and gender identity 2013. http://eeas.europa.eu/archives/delegations/jamaica/press_corner/all_news/news/2013/ministerial_declaration_-_eu_-_lgbt_violence.pdf	Croatia is among 11 member countries that make up a LGBT Core Group at U.N. on Ending Violence and Discrimination.	country	Low risk
Independent publications about this topic			
Eurostat, Gender pay gap statistics, 2017 https://ec.europa.eu/eurostat/statistics-explained/index.php/Gender_pay_gap_statistics#Gender_pay_gap_levels_vary_significantly_across_EU	This article provides a brief overview of gender pay gap (GPG) statistics, including the unadjusted gender pay gap used to monitor imbalances in earnings between men and women. The unadjusted gender pay gap is defined as the difference between the average gross hourly earnings of men and women expressed as a percentage of the average gross hourly earnings of men. It is calculated for enterprises with 10 or more employees. For the economy as a whole, in 2017, women's gross hourly earnings were on average 16.0 % below those of men in the European Union (EU-28). In Croatia, women's gross hourly earnings were on average 11.6 % below those of men. The Global Gender Gap index http://reports.weforum.org/global-gender-gap-report-2018/key-findings/ http://www3.weforum.org/docs/WEF_GGGR_2018.pdf The Global Gender Gap Index was first introduced by the World Economic Forum in 2006 as a framework for capturing the magnitude of gender-based disparities and tracking their progress over time. 2018 edition of the report benchmarks 149 countries on their progress towards gender parity on a scale from 0 (disparity) to 1 (parity) across four thematic dimensions—the subindexes Economic Participation and Opportunity, Educational Attainment, Health and Survival, and Political Empowerment—and provides country rankings that allow for effective comparisons across and within regions and income groups.	country	Low risk

	<p>According to Global Gender Gap, Croatia is ranked 59 out of 149 countries with the score 0,712 where score 0.00 = imparity and 1.00 = parity. Croatian results are above average or near average scores what cen be seen from table below:</p> <table border="1" data-bbox="922 209 1758 384"> <thead> <tr> <th>Thematic dimension</th> <th>Score Croatia</th> <th>Average score</th> </tr> </thead> <tbody> <tr> <td>Economic participation and opportunity</td> <td>0,681</td> <td>0,586</td> </tr> <tr> <td>Educational attainment</td> <td>0,998</td> <td>0,949</td> </tr> <tr> <td>Health and survival</td> <td>0,980</td> <td>0,955</td> </tr> <tr> <td>Political empowerment</td> <td>0,191</td> <td>0,223</td> </tr> </tbody> </table>	Thematic dimension	Score Croatia	Average score	Economic participation and opportunity	0,681	0,586	Educational attainment	0,998	0,949	Health and survival	0,980	0,955	Political empowerment	0,191	0,223		
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<p>Pološki Vokić, N., Sinčić Ćorić, D. i Obadić, A. To be or not to be a woman? – Highly educated women’s perceptions of gender equality in the workplace, 2017.</p> <p>https://doi.org/10.3935/rsp.v24i3.1432</p>	<p>The primary research was conducted on a sample of 675 highly educated women in Croatia. Results are tested for statistical differences according to respondents’ demographics and compared with highly educated men’s perceptions (n = 177). The secondary data reveal that gender segregation is less present among highly educated women. In general, the primary data imply that highly educated women do not perceive contextual factors to negatively influence their careers, even though they had some negative gender-related experiences. They have not been under-valued because of their gender or judged as less feminine if being determined, they did not experience undesired interest in their private lives or family duties, or a situation that their pregnancy was being accepted with irritation.</p> <p>Finally, it wasfound that men in general have significantly different perceptions of obstacles women face throughout their professional careers. Although they report that they have encountered discriminating behaviours towards women in their working environments at a lower extent, they perceive explored personal, organizational and social obstacles for women’s careers more negatively than women themselves. The paper concludes with equality initiatives recommendations based on research results, and interviews conducted with HRM and general directors from MNCs with best equality practices.</p> <p><u>Note:</u> The study was only focussed on highly educated women. Conclusions for other groups cannot be extracted from this study.</p>	country	Low risk															
<p>Youth Network of Croatia / Mreža mladih Hrvatske: The Way to Human Rights: Human Rights in Theory and Practice, 2017.</p> <p>Current status:</p> <p>http://worldpopulationreview.com/countries/gini-coefficient-by-country/</p>	<p>When describing incensement of social rights over last ten years, the Youth Network of Croatia looks at social protection, health care and level of inequality. The standard measure of social inequalities is the Gini coefficient of equivalent disposable income. The Croatian Gini coefficient (30.9) is quite close to the European Union average Gini coefficient (30.0). According to the results of the study, the coefficient raised from 21.1 in 1987 to 30.9 (the higher the better) in 2015 thanks to the social protection system, universal health care and education,</p>	country	Low risk															

	the level of inequality is relatively mild at the national level. At present it stands at 32,2%.		
<p>Conclusions</p> <p>There are no indications for a specified risk designation under indicator 2.2. We could therefore conclude that labour rights are respected, including rights as specified in ILO Fundamental Principles and Rights at work. No further evidences were found from national and international sources that contradict a low risk conclusion. The consulted local expert also declared this indicator as low risk.</p> <p>The following 'low risk' thresholds apply: (10) Applicable legislation for the area under assessment covers all ILO Fundamental Principles and Rights at Work, AND the risk assessment for the relevant indicator5s of Category 1 confirms enforcement of applicable legislation ('low risk'); AND (12) Other available evidence does not challenge a 'low risk' designation.</p>			
<p>Indicator 2.3. The rights of Indigenous and Traditional Peoples are upheld. Guidance:</p> <ul style="list-style-type: none"> • Are there Indigenous Peoples (IP), and/or Traditional Peoples (TP) present in the area under assessment? • Are the regulations included in the ILO Convention 169 and is UNDRIP enforced in the area concerned? (refer to category 1) • Is there evidence of violations of legal and customary rights of IP/TP? • Are there any conflicts of substantial magnitude [footnote 6] pertaining to the rights of Indigenous and/or Traditional Peoples and/or local communities with traditional rights? • Are there any recognized laws and/or regulations and/or processes in place to resolve conflicts of substantial magnitude pertaining to TP or IP rights and/or communities with traditional rights? • What evidence can demonstrate the enforcement of the laws and regulations identified above? (refer to category 1) • Is the conflict resolution broadly accepted by affected stakeholders as being fair and equitable? 			
<p>ILO Core Conventions Database, 2019. https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:11300:0::NO:11300:P11300_INSTRUMENT_ID:312314:NO https://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102700 https://www.un.org/development/desa/indigenouspeoples/declaration-on-the-rights-of-indigenous-peoples.html</p>	<p>Croatia did not ratify the C169 - Indigenous and Tribal Peoples Convention, 1989 (No. 169), because IP category is not present in Croatia. According to United Nations Forum on Indigenous Issues there are no Indigenous people in Croatia (https://www.un.org/esa/socdev/unpfii/documents/5session_factsheet1.pdf)</p> <p>As member of EU, Croatia supports the Rights of Indigenous Peoples through the UNDRIP- United Nations Declaration on the Rights of Indigenous Peoples. All EU Member States have signed the UNDRIP- United Nations Declaration on the Rights of Indigenous Peoples in 2007</p>	country	Low risk
<p>UN: Presence of Indigenous people in Croatia 2019. https://www.un.org/esa/socdev/unpfii/documents/5session_factsheet1.pdf</p>	<p>According to United Nations Forum on Indigenous Issues there are no Indigenous people in Croatia.</p> <p>It is estimated that there are more than 370 million indigenous people spread across 70 countries worldwide but not in Croatia. Practicing unique traditions, they retain social, cultural, economic and political characteristics that are distinct from those of the dominant societies in which they live. Among the indigenous peoples are those of the Americas (for example, the Lakota in the USA, the Mayas in</p>	country	Low risk

	Guatemala or the Aymaras in Bolivia), the Inuit and Aleutians of the circumpolar region, the Saami of northern Europe, the Aborigines and Torres Strait Islanders of Australia and the Maori of New Zealand.		
<p>IWGIA: Presence of Indigenous people in Croatia, 2019 https://www.iwgia.org/images/documents/indigenous-world/IndigenousWorld2019_UK.pdf</p> <p>Amnesty international: website 2019. https://www.amnesty.org/en/countries/</p> <p>Human Rights Watch: website 2019. http://www.hrw.org/</p> <p>United Nations human rights: website 2019. https://www.ohchr.org/EN/Issues/IPeoples/SRIndigenousPeoples/Pages/AnnualReports.aspx</p> <p>UN The Human Rights Committee: website 2019. https://www.ohchr.org/EN/HRBodies/CCPR/Pages/CCPRIndex.aspx</p> <p>UNDP United Nation's Development Programme: website 2019. https://stories.undp.org/10-things-we-all-should-know-about-indigenous-people</p> <p>Intercontinental Cry (IC): website 2019. https://intercontinentalcry.org/</p> <p>Society for Threatened Peoples: website 2019. https://www.gfbv.de/en/about-us/thats-what-we-do/</p> <p>WWF: website 2019. http://www.wwfadria.org/wwf_adria/hrvatska/</p> <p>Green Peace: website 2019. https://www.greenpeace.org/usa/?s=indigenous</p> <p>ILO: Who are the indigenous and tribal peoples? 2019. https://www.ilo.org/global/topics/indigenous-tribal/WCMS_503321/lang-en/index.htm</p> <p>Survival International: the global movement for tribal peoples, 2019. https://www.survivalinternational.org/tribes</p>	<p>According to many sources, there are no Indigenous people in Croatia. This is confirmed by United Nations Forum on Indigenous Issues, IWGA - International Work Group For Indigenous Affairs, Amnesty international, Human Rights Watch etc. In Europe, the only IP are the Saami of northern Europe, and they are not placed in Croatia.</p>	country	Low risk

<p>IFAD, website 2019. https://www.ifad.org/en/ifad-and-the-sdgs</p>			
<p>UN: Legislative on Indigenous people in Croatia, 2019 https://www.un.org/development/desa/indigenouspeoples/declaration-on-the-rights-of-indigenous-peoples.html https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52002DC0291</p>	<p>As member of EU, Croatia supports the Rights of Indigenous Peoples through the UNDRIP- United Nations Declaration on the Rights of Indigenous Peoples. All EU Member States have signed the UNDRIP- United Nations Declaration on the Rights of Indigenous Peoples in 2007. No specific national legislation because IP category is not present in Croatia.</p> <p>The EU has influence within the territory of its Member States but also has a global impact being an international key player, notably on human rights, development and environment issues. The EU is part of the international process of promoting and protecting the rights of indigenous peoples. All EU Member States have signed the UNDRIP- United Nations Declaration on the Rights of Indigenous Peoples in 2007, and the EU has contributed to and supported the Outcome Document of the World Conference on Indigenous Peoples in 2014.</p> <p>The following EU documents are showing the influence of the EU and the way combined decisions are made with regards to this topic and become regulations in later stages.</p> <p>Council of the European Union: Council Conclusions on Indigenous Peoples http://data.consilium.europa.eu/doc/document/ST-8814-2017-INIT/en/pdf EUR-Lex Document 51998DC0333 at https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:51998DC0333 European Commission - PRESS RELEASES - Press release - 2141th Council meeting Development Brussels, 30 November 1998 at http://europa.eu/rapid/press-release_PRES-98-421_en.htm EUR-Lex Document 52002DC0291 at https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52002DC0291 European Commission Press release - 2463rd Council meeting - GENERAL AFFAIRS - Brussels, 18 November 2002 at http://europa.eu/rapid/press-release_PRES-02-350_en.htm The EC Joint Communication to the European Parliament and the Council at http://eeas.europa.eu/archives/docs/arctic_region/docs/160427_joint-communication-an-integrated-european-union-policy-for-the-arctic_en.pdf The Joint staff working document on Implementing EU External Policy on Indigenous Peoples at https://eeas.europa.eu/sites/eeas/files/swd_2016_340_f1_joint_staff_working_paper_en_v2_p1_865982.pdf The New European Consensus on Development 'Our World, Our Dignity, Our Future' at https://www.consilium.europa.eu/media/24004/european-consensus-on-development-2-june-2017-clean_final.pdf Texts adopted - Tuesday, 3 July 2018 - Violation of rights of indigenous</p>	<p>country</p>	<p>Low risk</p>

	peoples in the world at http://www.europarl.europa.eu/doceo/document/TA-8-2018-0279_EN.html?redirect Violation of rights of indigenous peoples in the world (debate) - European Parliament at http://www.europarl.europa.eu/plenary/EN/vod.html?mode=unit&vodLanguage=EN&vodId=1530552699984		
Google the terms 'Croatia' and one of following terms 'indigenous peoples organizations', 'traditional peoples organizations', 'land registration office', 'land office', 'indigenous peoples', 'traditional peoples', '[name of IPs]', 'indigenous peoples+conflict', 'indigenous peoples+land rights'	No information on this issue found.	country	Low risk
<p>Conclusions:</p> <p>With regards to indicator 2.3 Indigenous and Traditional Peoples are not present in Croatia. Thus, the complete indicator is low risk.</p> <p>The following 'low risk' thresholds apply:</p> <p>(16) There is no evidence leading to a conclusion of presence of indigenous and/or traditional peoples in the area under assessment; AND</p> <p>(19) There is no evidence of conflict(s) of substantial magnitude pertaining to rights of indigenous and/or traditional peoples; AND</p> <p>(21) Other available evidence do not challenge a 'low risk' designation.</p>			

Controlled wood category 3: Wood from forests in which high conservation values are threatened by management activities

Overview

Forest history and current objectives

Croatia is located in Central and Southeast Europe, on the coast of the Adriatic Sea. The total area of Croatia, with the territorial sea, is 88 073 km², while the state land territory covers 56 594 km² (lit 3). Insular Croatia consists of over a thousand islands and islets varying in size.

The first written document that governs the relationship between man and forest in Croatia appears in the 12th century. The general development of forestry in the territory of Croatia during history was realized within the complex social, political and economic relations. During most of the historical period, the greatest impact on the development of Croatia forestry had The Venetian Republic, the Hapsburg Monarchy, (the Austrian Empire), France for a short time during Napoleon, and then the Austro-Hungarian until the First World War.

Forestry as the discipline was established in the second half of the 18th century, with the first forest inventory and mapping of forests dating back to 1764 (lit 1,2). The foundation of the first forestry units, as the fundamental units of a professional organization, can be taken as the official beginning of organized forestry development in Croatia. The first forestry units (Cro. *Šumarije*) were founded in 1765 in the mountain area, while in the lowland area they were established in 1773 (lit 1). The first regulation written in the Croatian language with legal force was the Forest Order of Marija Terezija adopted in 1769 (lit 2, lit 3). This law defined how forests are to be protected, harvested, and regenerated, thus making a basis for sustainable forest management in Croatia.

Croatia's position on the conjunction of the Pannonian, Alpine and Adriatic-Mediterranean climate conditioned the division into three basic natural regions: lowland or Pannonian, coastal or Adriatic, and mountainous or Dinaric Croatia (lit 1). Further division of the Republic of Croatia into regional units was conducted according to the model of conditional homogenous regionalization taking into consideration geographic, social and economic factors. On this way Croatia is divided into:

Pannonian-semi Pannonian (middle-eastern, lowland, and flat) region that covers approximately 55% of the surface,
Mountainous (Dinaric) region covers approximately 14% of the surface, and
Coastal (Adriatic, Mediterranean and coastal) region that covers 31% of the surface (lit 1).

Geomorphologic and climate differences between lowland, mountain, and coastal Croatia have resulted in a diversity of terrestrial, marine and underground habitats and a wealth of species (lit 4). There are more than 60 forest communities and around 4500 forest plant taxa in Croatia (lit 5). According to statistical data for 2018, forest land area covers 2 755 278 ha, which is around 48,6% of state land territory (lit 3). Forests cover 2 496 928 ha, which is 90 % of forest land area (lit 3) (not all forest *lands* are thus covered with forests).

Broadleaved species are predominant and cover 84% of the forest lands, while conifer forests cover 16% (lit 2). In the growing stock of forest stands dominate *Fagus sylvatica* (common beech – 37,22%), followed by *Quercus robur* (common oak – 11,55 %), *Quercus petraea* (*sessile oak* – 9,38%), *Carpinus betulus* (European hornbeam – 8,39%), and *Abies alba* (silver fir – 7,90%), with significant differences between various categories of ownership (lit 1).

The largest share of the total growing stock in the state forests has plain beech (39.50%), followed by common oak (13.35%), silver fir (9.62%), sessile oak (7.92%), and European hornbeam (7.18%), which comprise more than 70% of total growing stock owned by the Republic of Croatia. Compared to the state forests, in private forests tree composition is different. The common beech (28,04%) is still most common species, followed by sessile oak (15.20%), European

hornbeam, (13.23%), black locust (*Robinia pseudoacacia*) (6.27%), other hard broadleaves (4.94%), and common oak (4.34%). The silver fir makes 1,01% of the total growing stock in private forests (lit 1).

In Croatia, forests have mostly developed with natural regeneration, so they belong to the first or the second generation of naturally renewed vast virgin forests in the area between the Sava and Drava Rivers. According to the composition of trees, they are natural or very similar to the virgin forests from which they originated. The conservation status of Croatian forests is very good compared to the European level. As high as 95% of forest components show a natural composition, this is rare and highly valuable in global proportions (lit 5).

The distinctive feature of Croatian forestry is the management of natural forests and the use of natural regeneration as a basic method of forest regeneration. The reason why Croatian forests have retained their natural structure lies in natural or artificial regeneration, strict adherence to the principles of natural regeneration, and the abolishment of clear-cutting as a method of forest regeneration. The forests are characterized by factors such as stability, productivity, and biodiversity, which are conducive to sustainable management and natural regeneration. Basic postulates of Croatian forestry are:

- management with natural forests,
- preservation of natural structure and diversity,
- the use of natural regeneration as a regeneration method,
- maintenance of stability, diversity, natural structure and good market and non-market values,
- using forests and forestry in the light of environmental protection (lit 1, 17).

Forest types in Croatia (lit 1,5,6,67)

Almost all Croatian forest habitat types belong to one of the classes of NATURA 2000 habitats protected under the Habitats Directive. Some cover large areas like beech forests (*Fagus sylvatica*), pubescent oak (*Quercus pubescens*) forests and common oak (*Quercus robur*) forests. The others have restricted distribution like relic forests of lime and yew, relic forests of black pine and chestnut woods. The largest forest complexes can be found in the western Dinaric Alps (Gorski Kotar, Velebit Mountain) where the beech and fir forests predominate, as well as in the Sava River region with the alluvial basins of Spacva and Lonjsko Polje. In the Mediterranean region, most forest vegetation is in macchia form (shrubland forest), though there are also areas with nicely preserved holm oak as well as black pine forests. The following can be said about the various forest types:

Continental, lowland forests

The lowest forests of the lowland belt along the river are influenced by flooding and river erosion. Those forests belong to the middle European flood-plain and swampy forests of willow (*Salix sp.*), poplars (*Populus sp.*), the narrow-leafed ash (*Fraxinus angustifolia*) and common alder (*Alnus glutinosa*). They are subject to prolonged flooding and may be in the water for a few months a few feet deep. The forests of common elder (*Sambucus nigra*) and the narrow-leafed ash (*Fraxinus angustifolia*) are located further of the rivers, mostly around Djurdjevac and Lonsko polje next to Sava river. The forests of common oak (*Quercus robur*) are also under the influence of flood and groundwater. In the past, those forests comprised large complexes between rivers Sava and Drava, but this is now turned in agricultural land. On the elevated ground on hills up to a height of 350 m above sea level the forests of sessile oak (*Quercus robur*) grow as they are not exposed to the flooding, and high groundwater influence. It is an area with many villages, fields, vineyards, orchards Along with sessile oak European hornbeam (*Carpinus betulus*), sweet chestnut (*Castanea sativa*), birch (*Betula pendula*), and Sycamore (*Acer pseudoplatanus*) can be found. In these mixed

forests, the ground layer is very rich. In the sunny warm slopes, durmast oak (*Quercus pubescens*) grows. The highest parts (from 350 to 700 m) of Pannonian Croatia takes over the beech (*Fagus sylvatica*), which can withstand the cold at the higher altitudes. Beech forests are also a transition to mountain forests.

Mountainous, Dinaric forests

As the altitude rises towards Gorski Kotar and other mountainous areas, the thick shade Dinaric beech (*Fagus sylvatica*) forests appear. The ground floor of this forest community is the richest of all Croatian forests. With the further rise of the altitude, the beech is joined by silver fir (*Abies alba*). This dinaric beech and fir forest forest (Calamintho-Abieti-Fagetum) is the most widespread type of forest in the mountainous area, with preserved primeval forests such as Čorkova uvala, Devčića tavani, Plješivička uvala, Klepina duliba (locations in Croatia with primeval forest). Only the extreme habitats such as steep rocks are populated by a clear spruce forests (*Picea sp.*). Over 1200 meters, the conifers retreat and the subalpine beech forests grow. The slopes of the high Dinaric mountains facing the sea, as well as the distant karst mountains in the hinterland are warmer, and the thermophilic communities appear. On the highest slopes first comes the Mediterranean forest of common beech (*Fagus sylvatica*), which makes the border forest community between the Mediterranean and the continent.

Mediterranean forests

Below that belt is already the true Mediterranean, with its highest belt. It is made of European hop-hornbeam (*Ostrya carpinifolia*) and pubescent oak (*Quercus pubescens*). It rises up to the altitudes of 300 meters in the north Adriatic and up to 600 meters in the southern Adriatic area. As it is warmer with a lot of moisture, the mixed broadleaves forests are predominant. Descend further towards the sea, the dry and warmer submediterranean begins where the hornbeam (*Carpinus betulus*) and pubescent oak (*Quercus pubescens*) prevail. The coastal vegetation belt includes most of the Adriatic islands, Central and Southern Dalmatia and the narrow coastal area of the Croatian seaside. Successive zone includes a slightly humid and moderately warmer central part of the Croatian seaside. It is made of evergreen oak (*Quercus ilex*) forest, and there is also the manna ash (*Fraxinus ornus*), which begins to disappear south of the city of Split. Due to the centuries-old influence of man, very little evergreen oak forest (*Quercus ilex*) is preserved. The Mediterranean vegetation zone encompasses the hottest part of the coast - the largest part of the Adriatic islands south of Kornati, and the mainland area south of Split. These are Aleppo pine (*Pinus halepensis*) forests. This species is often used for afforestation of sunken surfaces, but also for aesthetic reasons, and it is also extended to the northern Adriatic. On the highest peaks of the Adriatic islands grow the forests with European hop-hornbeam (*Ostrya carpinifolia*), Austrian pine (*Pinus nigra*) and evergreen oak (*Quercus ilex*).

Forest statistics and land ownership (lit 1,3,65)

The Croatian land area is 5 659 400 ha. Forests lands cover 2 755 278 ha or 48,6% (of which around 2 496 928 ha is actually covered with real forest). Croatia is one of the countries with highest forest cover in Europe. There is an increasing forest cover growth (8% since 1986 or 0,24% per year) as can be seen in the table below.

Table 1: Forest growth over time (lit 1,3 & 65)

Time	Forest land with forest present
1986	2 061 509
1996	2 078 289
2006	2 402 782
2015	2 416 107
2017	2 496 928

Most of all forests belongs to naturally regenerated forests, but besides that there is coppice forests, and macchias (shrub forest). Plantations and other forest cultures take around 2,98% (lit 1). Such plantations are almost all owned and managed by the State company “Hrvatske šume d.o.o” (CF Ltd), see below.

The total growing stock in the forests of Croatia is 418 618 277 m³, based on management plans and estimated growing stock for the forest areas without management plans. In the period 2006 to 2016 growing stock increased by 5 % (20 658 m³). 80% of the growing stock is in the state forests, while 20% is in private forests. The annual increment is 10 146 149 m³, or 5,87 m³/ha. In the past ten years, a total allowable cut was realized on the surface of 783 4048 ha or 60% of the managed area and the cut was 56 160 375 m³ or 86% of the allowable cut (lit 1). The realized cut in private forests for the same period was 2 392 543 m³ (34% of allowable cut).

State

76% of forests lands in Croatia are state forests (2 095 266 out of 2 755 278 ha). State company “Hrvatske šume d.o.o (CF Ltd)” manage 97% of all *state* forests, while the rest of 3% are managed by other bodies of state administration or other legal persons established by the Republic of Croatia (i.e. Faculty of Forestry, University of Zagreb). This includes 70 456 ha of plantations, that are all managed by CF Ltd. All State lands are under Forest Management Plans or under Nature protection plans (when protected areas).

Private

Private forests comprise 24% of all forest land in Croatia, leading to 660 012 ha in 2019. They are according to Act of Forests divided in categories: (a) small, up to 20 ha; (b) medium, between 20 and 300 ha; and (c) large, more than 300 ha. Privately owned forests are still not covered completely by FMPs (still 30% of private forests (circa 220 000 ha) is in the process of development FMPs which is financed by State budget and it is planned to be developed before 2025. All of the above include 4 429 ha of plantations, owned and managed by private owners.

Forest Management in general and organisations involved (lit 1,10,41)

Forests are resource of national interest and their management is prescribed by Act on forests (lit 10) which require that all forests are managed according to Forest management plans (FMP) which development and main rules are explained in Rulebook of Forest Management (lit 41). Part of the development of FMP's is also an assessment of the field situation (and HCV presence). The total forests and forest land area of Croatia is divided in Forest management units (FMU) and each should have a FMP.

The FMP system in Croatia is a national enforced system. Forest Management Planning, by 2025, should cover 100% of all forest lands, state and private, protected or not. They are ‘land based’, not so much owner or type-of-protection based. FMP's should thus be in place for all state and private forests and also for all protection classes except for 2 classes; strict reserves and national parks, these have ‘Nature Protection Plans’.

Since January 2016, the forest area of the Republic of Croatia is divided into 684 forestry units owned by the Republic of Croatia and 407 forestry units owned by private owners. 649 of the State units are managed by limited liability company CF Ltd. 35 state forest management units were used or managed by other state administration and legal entities founded by the Republic of Croatia. Some of these are without forest management plans because they belong to national parks and strict reserves.

Main organizations in forestry and nature protection:

- **The Ministry of Agriculture** performs administrative and other tasks relating to forestry, wood industry, and hunting. The [Directorate for Forests, Hunting, and Wood Industry](#) (MOA) is in charge of implementation of international agreements in the area related to forestry, forestry ecology, forest protection, including elemental disasters and anthropogenic impacts, and fire, as well as regulation of the relationship and conditions of production, transport and use of forest seed and forest seedlings, preservation of forest genetic resources and forest reproductive material (lit 7). This for both State and private forest land. The Ministry of Agriculture took over the tasks from the Croatian Agricultural and Forestry Advisory Service (lit 9), who was previous in charge for working with forest owners (lit 10, 11,12).
- **State Inspection.** The Act on State Inspectorate was approved on 1-4-2019 ([OG 115/18](#)). It define the structure of a State Inspectorate, governing, the conditions for executing inspections and responsibilities and authorities with the purpose of protection of public interest. The new State Inspection took over all inspections from all Ministries, forestry as well. Still the [offices are in the Ministry](#) but they obey to [State Inspectorate](#). The State inspection is active in state and private forest (and land) owners. If the inspectors find some illegality they can issue a penalty or involve the police which is the case when they find illegal logging. Usually they control papers or procedures, also in the field but not that often. Illegal logging or stealing of wood is police business and the owner should call the police. Police or State inspection reports are not published, also not in annual summarizing reports.
- **Croatian Forests Ltd (CF-ltd) “Hrvatske šume d.o.o.”**, limited liability company, is a legal successor of "Hrvatske šume", public enterprise for forest and woodland management in the Republic of Croatia, founded on the basis of the Amending Forestry Act (NN 41/90), with the beginning of function on January 1st, 1991. Today, Hrvatske šume d.o.o. is a three-layered commercial company owned by the state, with the Headquarters in Zagreb, 16 regional forest administrations (subsidiaries) and 171 regional forest offices. “Hrvatske šume d.o.o.” is in charge for drafting country-wide & regional forest management plans (every 10 years) and implementing sustainable and integral management in the state forests on the whole territory of the Republic of Croatia in an environmentally sensible, economically efficient and socially responsible way (lit 8).
- Research work is performed by the **Croatian Forest Research Institute and the Faculty of Forestry of the University of Zagreb**. The Croatia Forest Research Institute is in charge for forest management plans for forests with special purposes (lit 13).
- Natura 2000 sites and protected areas are administrated by the **Ministry for environmental protection and energy**, through Directorate for Nature Protection (lit 15). Natura 2000 sites correspond to the Croatian Ecological Network (lit 1). The management of protected areas is done by various public agencies established for the purpose of managing such protected areas (full list available in Croatia, see lit 16).
- The **Croatian Agency for Environment and Nature** is an independent public institution established by the Government of the Republic of Croatia in 2015. It has the tasks of gathering and aggregating data and information on the environment and nature, monitoring the implementation of environmental and nature protection policies, sustainable development and other professional activities, and providing expertise in management planning. At the beginning of 2019, the Agency was merged with the Ministry for Environmental Protection and Energy (lit 17). This ministry is also responsible for the implementation of Nature 2000.

Categories of forests and forest protection in Croatia

All forests in Croatia are multi-functional. According to the Rulebook on Forest Management purpose (lit 41), the forests in Croatia are divided into:

- Commercial or productive forests – forests with predominantly economic functions (including plantation).
- Protective forests (lit 10)– forests with the primary function of protection of water, soil, etc.

- Special purpose forests – As explained in the Overview of category 1, this group is separated in 6 types of special purposes.

About protected forests

As part of the special purpose forests the Protected forests are forests and forest lands within protected areas based on nature protection regulations, and are divided into:

- Forests where natural use of natural resources is permitted
- Forests prohibiting the economic use of natural resources

The Law on environmental protection (2018– Zakon o zaštiti prirode (1994, 2007, OG 78/2015, 12/18)(lit 19) is the basis for this protection.

Based on the Law on environmental protection in the Republic of Croatia there are 9 categories of the protection: strict reserve, national park, special reserve, nature park, regional park, a monument of nature, significant landscape, park forest and architectural park monuments. Protected areas of state importance are the strict reserves, national park, special reserve and nature park. Protected areas of local significance are regional park, nature monument, significant landscape, park-forest, and architectural park monuments (lit 15, 19-21). Protected areas are entered in the Register of Protected Areas that is maintained by the ministry of agriculture. The entry of protected areas and deletion from the Register of Protected Areas is done on pursuant to the Law on environmental protection.

Protected areas are managed by public institutions performing the activities of protecting, maintaining and promoting the protected area, as well as monitoring. Each national park and nature park is managed by a separate public institution established by the Government of the Republic of Croatia. Other categories of protection are managed by public institutions established by the representative body of the regional self-government or the local self-government in whose territory the protected area is (lit 15, 19-21).

The management of protected areas is implemented through a management plan for a period of ten years through the annual program of protection, maintenance, preservation, promotion, and use. The management plan defines management objectives, activities to achieve management goals, and performance management indicators (lit 15, 19-21).

For forests and forest land within protected areas of special reserve and forest parks measures of their protection are an integral part of the forest management plan (lit 1). For forests and forest land within protected areas of the strict reserve and national park, special programs of protection are developed that contain measures of their protection.

In addition, for areas protected by the strict nature reserve, national park, special reserve and nature park, the Law on environmental protection prescribes the conditions and measures for the protection, preservation, improvement, and use of the protected area with administrative measures. For other categories of protection, a 'Decision on measures for protection, preservation, improvement, and use of the protected area' may be declared and implemented (lit 15, 19-21). Such a decision is site specific and not a separate law.

By the Decree on ecological network (2013 Uredba o ekološkoj mreži (NN 124/2013) (lit 39,40), the ecological network of the Republic of Croatia was established, which at the same time represents the areas of Natura 2000 network. Natura 2000 is implemented through this ecological network. The ecological

network is administrated by the Ministry of Environment Protection and Energy (MEPE), through the Directorate for Nature Protection, the Section for protected areas, geodiversity and ecological network. It defines 38 sites for bird conservation and 741 sites for the conservation of habitat types and species. There are 779 Natura 2000 sites in total, encompassing 5 659 400 ha (2 070 400 ha terrestrial, 498 600 ha marine), which makes 36,58% of the country. Protected sites include 73 habitat types and 141 wild species). The table below outlines the area of protected and protective forests:

Table 2: Categories of forests (sources mentioned in table). State as per 2017 (all types require an FMP except for strict reserves and national parks because there any harvesting is prohibited, and wood cannot enter the market).

Categories of forests:	Total Number of ha	Ha of forest	% of forests	Managed by
Total Production forests (lit 1, table 54)	1 425 809	1 353 811	54%	78% in state forests (and these are 100% managed by Hrvatske šume). Remaining 22% owned and managed by private.
Total Protective forests (lit 1, table 54)	832 095	710 137	29%	78% in state forests (and these are 100% managed by Hrvatske šume). Remaining 22% owned and managed by private.
Total Special Purpose forests (lit 1, table 55)	501 134	428 727	17%	Public agencies for managing protected areas. 6 types of special purpose possible. And 'protected forest type further separated into 9 different protection classes.. Of this: Special purpose type 1-5: : 35 193 ha Special purpose type 6: The 9 classes of protection: 465 933 ha
Separation under Special purpose forest				
1.Forest seed productive stands	4 259		0,07	State CF ltd. Private 174 ha.
2.Forest for scientific research and education	6 457		0,11	State CF ltd and Forestry Faculty (FF)
3.Forests for defense	20 597		0,36	State CF ltd and Ministry of Defense (MOD). 18 219 ha State, 2 377 ha private
4.Forests for golf and camping (source: local expert)	1439		0,07	State CF ltd
5.Forests according to special legislative acts	2442		0,04	State CF ltd, Ministry of Health (MOH)(a hospital), Ministry of Justice (MOJ), by Croatian waters Public company (CP)
6.Protected forests				See below, 9 further classes.
The 9 Protected forest classes:				
1. Strict reserves (lit 1, 20,32)	1125		0,02	Economic and other activities are prohibited in the strict reserve but visiting, research and monitoring of the state of nature may be permitted. No FMP required, but often a Nature Management Plan available.

2. National Parks parks ((for description see lit 22-31, the area (ha) (lit 1,32)	52 972		0,93	Incl 4 027 ha private (thus these are private lands inside National Parks). No FMP required, but often a Nature Management Plan available.
Hajdučki i Rožanski kukovi (part of Northern Velebit National Park) (lit 1)				Public agency "National park Sjeverni Velebit (Javna ustanova Nacionalni park Sjeverni Velebit)
Bijele i Samarske stijene (lit 24)				National Park Risnjak (Nacionalni park Risnjak)
Plitvice Lakes National Park (Nacionalni Park Plitvička jezera) - UNESCO World Heritage List (lit 23, 32)				Public agency Plitvice Lakes National Park (Javna ustanova Nacionalni park Plitvička jezera
Paklenica National Park (Nacionalni park Paklenica) - the largest and best-preserved forest complex in the territory of Dalmatia (Lit 25, 32)				Public agency Paklenica National Park (Javna ustanova Nacionalni park Paklenica)
Risnjak National Park (Nacionalni park Risnjak) (lit 26,32)				Public agency Risnjak National Park (Javna ustanova Nacionalni park Risnjak
Mljet National Park (Nacionalni park Mljet) (lit 27,32)				Public agency Mljet National Park (Javna ustanova Nacionalni park Mljet)
Kornati National Park (Nacionalni park Kornati) (lit 28,32)				Public agency Kornati National park (Javna ustanova Nacionalni park Kornati)
Brijuni National Park (Nacionalni park Brijuni) (lit 29,32)				Public agency Brijuni National Park (Javna ustanova Nacionalni park Brijuni)
Krka National Park (Nacionalni park Krka) (lit 30,32)				Public agency Krka National Park (Javna ustanova Nacionalni park Krka
Northern Velebit National Park (Nacionalni park Sjeverni Velebit) (lit 31,32)				Public agency Northern Velebit National Park (Javna ustanova Nacionalni park Sjeverni Velebit
3.Special reserves There are currently 77 special reserves (lit 32)	16 885	16 885	0,30	State CF Ltd: 16 341 ha State Other legal entities; Ministry of environment protection and energy (MOEE): 60 ha Private: 484 ha
This includes 36 special forest vegetation reserves (for more details see lit 32)				
4. Nature parks (lit 1, 32) Below: the names of the parks.	301 949		5,33	State. Includes 21190 ha of private lands. Nature parks are managed by special state organisations specially raised to manage the park. These private lands are managed by private owners, but they have to follow the same regulations and limitations applicable to Nature parks. In some cases, financial compensation is in place if this means a loss of income.

Park prirode „Biokovo				
Park prirode „Kopački rit“				
Park prirode „Lastovsko otočje“				
Park prirode „Lonjsko polje				
Park prirode „Medvednica				
Park prirode „Papuk				
Park prirode „Telašćica				
Park prirode „Učka				
Park prirode „Velebit“ – UNESCO Biosphere reserve from 1978				
Park prirode „Vransko jezero“				
Park prirode „Žumberak - Samoborsko gorje				
5. Regional parks (lit 1, 32)	41 2019		0,72	A public institution of municipal level for managing protected areas. Including 4 365 ha of private lands. These private lands are managed by private owners, but they have to follow the same regulations and limitations applicable to Regional parks. In some cases, financial compensation is in place if this means a loss of income.
Regional park Mura – Drava (lit 32)				Local authorities
Moslavačka gora				Local authorities
6. Monument of nature	5		0,00	Of which 1 ha is private.
7. Significant landscapes (lit 66 and 1)	49 561		0,87	Of which 6 530 ha of private land. 13 sites in forest. There are 82 Significant landscapes, with 133 128 ha, in total, but the rest is outside forests. Their details can be found online on the GIS portal (search under Zaštićena područja – poligoni) and the list with info in the country forest management plan.
8. Park forest	2 216		0,04	State CF Ltd: 1 894 ha State Other legal entities (Municipalities): 261 ha Private: 61 ha
9. Architectural park monuments				Overlap with the any of the 8 classes above. Thus a protected area can have 2 appointed classes in such a case.
International (overlap with all of the above)				Public agencies for management of protected areas
Natura 2000. 36,58 % of national territory (lit 1,10,32)	5 659 400	Approx. 50%		

UNESCO Man, and Biosphere reserve Velebit (20 3551,12 ha) (lit 32-36) Mura - Drava – Dunav (395 604,77ha) (lit 32-36)	599 155			
UNESCO Ancient and Primeval Beech Forests of the Carpathians and Other Regions of Europe Parts of National Parks Paklenica and Northern Velebit belong to it (lit 32, 37)	Total UNESCO 92 023 from which in Croatia 3 287 ha			
UNESCO World Natural Heritage List (lit 32)	29 630			Plitvica Lakes National Park
UNESCO Global Geopark (lit 32,36)	52 393			Geopark Papuk
Ramsar sites (lit 75)	93 693			5 sites (Crna mlaka, Delta Neretve, Lonjsko polje, Vransko jezero, Kopački rit

Cultural Heritage Sites (lit 42,43).

The official 'Web search engine for cultural goods of the Republic of Croatia' is an official collection of data on cultural heritage in the territory of the Republic of Croatia. It is administrated by The Ministry of Culture.

Laws, regulations and international agreements

The right to manage a forest property in Croatia is limited and carried out to ensure sustainable and multifunctional (ecological, social and production function of the forest) management. The main legal framework of forestry represents the new Law on Forests (lit 10), adopted in 2018 (with one amendment) and the Forest Management Plan for the Republic of Croatia valid for the period 1.1.2016-31.12.2025 (lit 1). The full list of forestry relevant legal documents is accessible through the website of Ministry for agriculture, section on laws and regulations (lit 44).

Main legal documents that regulate nature protection are Law on environmental protection (lit 19,20), Strategy and Action Plan for the Protection of Biological and Landscape Diversity of the Republic of Croatia (lit 46), and The Strategy and Action Plan for Nature Protection of the Republic of Croatia for the period 2017-2025. The Strategy includes guidelines of the global Strategic Plan for Biodiversity 2011-2020, adopted at the 10th meeting of the Conference of the Parties to the Convention on Biological Diversity and the Convention on Biological Diversity (CBD) (lit 46). Various other laws and regulations in place, whose full list is accessible through the website of the Ministry for Environment protection and energy (lit 45).

Croatia signed 20 international conventions (lit 45,49). The Convention on Biological Diversity (CBD) was ratified in 1997 (lit 4,48). The Ministry for Environment Protection and Energy is responsible for its implementation. The CBD is implemented through 'The Strategy and Action Plan for Nature Protection of the Republic of Croatia for the period 2017-2025' (lit 47). The fifth national report was published in 2014 (lit 48).

89 key biodiversity areas (KBAs), as defined by IUCN, are identified in Croatia (internationally significant KBAs including global KBAs, regional KBAs, and sites whose global/regional status has yet to be determined (lit 50). Flora and Fauna are also protected by various regulations on endangered species/ National red list (lit 51,73).

Although Croatian nature is of high value, many of its species are threatened according to the IUCN criteria. On the red list with tree species only *Betula pubescens Ehrh* (bog birch) is listed as critically endangered. It can be found in National park Krka, and Botanical reserve Banski Moravci). Besides that *Taxus baccata L.* (yew) is listed as vulnerable. The specie can be found in Special reserves Rožanski and Hajdučki kukovi and Bijeleski Samarske stijene, National parks North Velebit, Paklenica, Plitvička lakes, Risnjak and Nature parks Medvednica, Učka, Biokovo, Žumberak and Samobor mountains and Velebit. Both are not commercial species and can be found in protected areas like Special reserves, National parks and Nature parks (where protection plans are developed) and there are therefore no direct threats from forest management to them.

There are no CITES (tree/wood) species occurring in Croatian forests (lit 51).

Forest operations and felling permits

- Commercial or productive forests. All activities done are based on forest management plans. All national and international legislation, conventions, strategies and action plans on nature conservation are included in forest management plans. Forest owners are responsible for proposing the forest management plans, that further need to be approved by the Ministry responsible for forestry. For state forests, forest management plans are done by the Public company Hrvatske šume (except for forests managed by other public legal subjects, such as Ministry for protection). For private owners Forest Management Plans are often done by registered experts. Forest management plans are done for 10 years, and for their implementation, Operational Annual plans are developed. Part of the development of FMP's is also an assessment of the field situation (and HCV presence). All forest owners (including private) are thus obliged to register in the Forestry register, Administrated by Ministry for Agriculture (lit 53, 54). They are obliged to have a Programme for managing private forests (a Forest Management Plan) and Operational annual plans for implementation. For small and medium private forests (up to 300 ha) all planning can be done by the Croatian Agricultural and Forestry Service, which was in 2019 joined with the Ministry of Agriculture. But this only in case such small owners declare that they need help because they do not have the expertise or funds to develop the plans. There are also funds for small and medium owners to assist them with the process in case they want to do it on their own, but do not have the funds. Even with all support in place it can happen that FMP's are still not (yet) developed with small scale owners. In case such Program for managing private forest is not developed the Ministry responsible for forestry issues a '*Decision for the removal of trees*' (lit 10) when this is not contradicting the regular Forest laws and regulations. Such a permits is only for a short duration, to remove the trees when agreed. But this is only a temporarily measure as long as a FMP is not yet developed. The process should be finished by 2025.

Forest law

The marking and felling are prescribed by the *Ordinance on the Marking of Trees, Marking of Wood Assortments, Compensations and Forestry Order*, which was amended in 2017 (lit 52). It prescribes the way and documentation for marking the trees for felling, marking and documentation for wood assortments, and, as well as necessary documentation for transport of wood and wood assortments (*transport certificate*).

Based on the approved annual plans marking trees for harvest is possible. The marking of trees in forests and on forest land is done by a forestry contractor who possesses the corresponding license of the Forestry Chamber and based upon the Request for marking. State and big private forest owners are obliged to enter the data on trees marked for felling into an electronic *Register of records*, while for small and medium forest owners the registration is done by the Ministry for agriculture. In all forests, only the removal of marked trees is allowed. No further permits are needed because all harvesting should be in line with the annual plans and registered in the Register of records.

There are amendments made to the *Ordinance on the Marking of Trees, Marking of Wood Assortments, Compensations and Forestry Order* from 2017 (lit 52) for the purpose of establishing traceability in accordance with the EU Timber Regulation (EUTR). This to guarantee properly labeled wood assortments (technical wood and spatial wood) for which a transport certificate is needed. Such document list the load from the first storage location to the final processing site. When replacing on the market and transport, the owner of the wood assortments shall have copies of all accompanying documents and other relevant documentation (invoice, etc.) proving the origin of the purchased goods (lit 52). With private forest owners such transport certificates are to be issued by a forestry contractor who possesses the corresponding license of the Forestry Chamber. In case of State forests these are issued by Public company Hrvatske šume.

- **Protective forests.** In these forests forest management activities are limited and production of wood assortments is a result of silvicultural work. Management of protective forests is done by the forest owner in accordance with forest management plans. The organization and procedure of harvesting the wood and wood assortments from protective forests is the same as described in productive forests above, but extra regulations about protection are to be complied with.
- **Special purpose forests.** This group is separated in 6 types of protection: protected forests (forests in protected areas), urban forests, Forest Seed Objects, forests for scientific research, forests for the defense of the Republic of Croatia and forests for the purposes specified by special regulations. For each of these types different rules are applicable. With some of the types harvesting is not allowed, in others it is, but under strict regulations. See further down below for details about management for each of the mentioned protection classes.

Products

According to the Statistical Yearbook 2018 (lit 3) in 2017, the total production of Roundwood in Croatia was 5 307 million m³ from which are: firewood – 1 858 million m³, industrial roundwood – 3 449 million m³, sawing logs and veneer logs – 2 392 million m³, pulpwood – 1 052 million m³, other industrial roundwood – 5 000 m³ (lit 3). Based on the analysis of financial reports of legal subjects in forestry, (lit 55) conducted by Financial agency (lit 56) in 2016, 204 entrepreneurs were active, employing 8 412 employees, and contributing NET revenue of approximately 29 million euros. The largest number of entrepreneurs in the forestry and logging sector was headquartered in Karlovac County (31 companies), the City of Zagreb (26) and Sisak-Moslavina (24). According to the criterion of the realized profit and total revenue in the section of forestry and logging operations, the first is the large state-owned entrepreneur šume d.o.o. (23,5 million in profit, holding 77,9% of the profit of the forestry business segment and HRK 2,1 billion in total revenue or 78,2% of the revenue of the business segment) (lit 5).

Picking wild forest species, such as forest fruits and mushrooms are regulated by the Law on environmental protection, and 'Ordinance on the collection of native wild species' (2017 Pravilnik o sakupljanju zavičajnih divljih vrsta, NN 114/2017) (lit 57). In strictly protected areas (strict reserves and natural parks), picking of wild forest species is prohibited, while in special reserves it is often prohibited as a commercial collection.

The Ordinance provides a list of native wildlife species for which, when collected commercially, a permission is required. Such permission prescribes the general measures of management and protection of species and species groups, defines in detail the content of the application for obtaining permits for the commercial use of the native wildlife species concerned, as well as the conditions for obtaining the permit. Statistics for the collection of Non Timber Forest products (NTFPs) are not available, but in general NTFP's are harvested by local citizens using it for their own consumption. They are mostly related to mushrooms, aromatics and maybe nuts.

In addition to the Ordinance, a sustainable collection of these types is also provided by the ‘Expertise for gathering wild species’ (lit 58), prepared by the Croatian Environment and Nature Agency (HAOP). It prescribes special collection measures, which are changed annually due to weather conditions, climatic conditions, pressure on species and its habitat, etc. Special measures include annual quantities (quota) or time of collection of a particular species.

Forest certification

Currently there are 13 FMU certificates issued for in total 2 048 592 ha (in total 82% of all lands with forest cover). Of the 13 FMUs, 3 are private and 10 are from State forest and are related to their Group scheme. All forests managed by the State company Hrvatske šume are certified by a FSC Multisite (Group) scheme covering 16 Regional Enterprise Offices (Certificate registration SA-FM/COC-001212). Certified product groups are round wood logs, fuelwood, twigs, and wood chips. The certificate was renewed in 2017 (lit 61,68,69). Almost all state forests managed by CF Ltd are thus FSC certified (96,6% of all state owned forests, or 2 024 026 ha). The remaining 3,4% is not certified. Those are productive forests but having additional goals (education, protection, etc.) beside production of wood. Some private owners are also certified (3 owners with 24 565 ha), often because forests were given back to their original owners recently, and such forests were certified in the State group scheme (source: FSC website (lit 68) and local expert, 2019). Audit reports from the last 5 years are consulted throughout the CNRA to compare with the findings in this document.

High Conservation Value Forest in Croatia

Almost all forest in Croatia that can be categorized as HCV forest are under the strict protection or Natura 2000 network. Besides this, according to Croatian Ministry for agriculture, there are also 12 primeval forests in Croatia covering an area of 848 ha (lit 63,64):

Table 3: Primeval forest in Croatia (lit 63,64).

Name	Area in ha	Location
Čorkova uvala	79	Plitvice Lake National Park
Klepina duliba,	118	Northern Velebit - Štirovača
Devčića tavani	100	Northern Velebit
Nadžak-bilo	17	Northern Velebit
Javorov kal	40	Risnjak National Park
Plješivačka uvala	3	Lička Plješevica
Ramino korito	234	South Velebit
Muški bunar	41	Psunj
Medvjedak	156	Plitvice Lakes National Park
Prašnik	58	Middle Posavje

The Croatian government is working on its own system of HCV definitions and classes, similar to FSC. The idea is that the 9 classes of protection are then allocated to the Croatian HCV classes, each with its own management requirements. Nevertheless, the Croatian HCV definitions are not the same as the FSC ones for the moment. To avoid confusion, it was therefore decided not to use the Croatian HCV definitions in this CNRA (lit 61,68,69).

Management of protected sites in general is to preserve the values that are protected, which means that in these forests are allowed only those operations that do not disturb its basic protective function, and according to the category of protection these measures may be more or less stringent. For forests and forest lands that are located in Nature Park, Special Reserves, Regional Park, Important Landscapes, Natural monument and Park Forests, Forest Management Plans are implemented by the CF Ltd company and by (most) private forest owners.

Such plans, and the corresponding 'Programme of measures', for forests and forest lands in these protected areas are defined and approved by the Ministry and the government body responsible for nature protection (Ministry of Agriculture (MA) and Ministry of Environment Protection and Energy (MEPE)), after obtaining the opinion of the CF Ltd company and legal persons responsible for protected area management.

Forests and forest lands that are located in protected areas in the categories of National Parks and Strict Reserves are excluded from management and for these special 'Programs for nature protection' are developed by the Public Institution that is managing the site.

Forests and/or trees protected as natural monuments and monuments of park architecture are also covered by special 'Programs of nature protection' and are also developed by Public Institution responsible for their management. Management in each of the types and classes of protection, will follow below (sources: lit 61,68,69 and local expert):

Special purpose forests: Strict Reserves, National Parks. Management (no FMP required, but often a Nature Management Plan available):

Strict Reserve: In a strict nature reserve economic and other activities are prohibited.

National Park: In National Park economic activities are not allowed when it concerns forest management. Only some protective measures can be allowed meaning cutting the trees which present threats to visitors or trails or any other objects and it is done based on specific permit issued by the Park manager from the Ministry. Every National Park has a Management Plan and Program for protection and improvement of natural features approved by the responsible Ministry. These forests are not part of FSC process as they are excluded from management.

Special purpose forests: Nature Park, Regional Park, Significant landscape. Management (FMP required):

Nature Park: In the park, only economic and other activities that do not threaten its basic features and roles are permitted. The method of performing economic activities and use of natural resources in a nature park is determined by the nature protection conditions.

Regional Park: In the park economic activities are allowed but only if they do not threat its basic features and roles. The Regional park is in jurisdiction of local, regional government and is defined by the county or the City of Zagreb.

Important landscape: Landscape interventions and actions that violate the characteristics that have been identified are not allowed.

Special purpose forest: Special reserves, Natural monument. Management (FMP required):

Special Reserve: In the special reserve, it is not permitted to take any actions that may impair the properties why the reserve was declared (picking and destroying plants, disturbing, capturing and killing of animals, introduction of new biological species, land-improvement procedures, various forms of economic and other use). In the special reserve operations only actions and activities to conserve or improve conditions for the preservation of important properties for which it was declared protection are allowed. Visiting and sightseeing in special reserves may be prohibited or restricted.

Natural monument: In the natural monument area, and its vicinity, which is an integral part of the protected area, activities that threaten its features and value are not permitted.

Special purpose forests: Forests and forest parts registered for the production of seed and Forests intended for the defence (military). Management ((FMP required):

Special purpose forests for seed production are forests selected for seed production and for such special management plans are developed and accepted by MA and MEPE. This also with conditions of nature protection given by MEPE.

Forests for defense have their own management plan which is implemented by the responsible state administration. Forests protected by Bylaws (around hospital or penitentiary) also have management plans developed and implemented.

Special purpose forests: scientific research, teaching and education, Park Forest (natural or planted), Golf areas and camping sites (recreation). Management (FMP required):

Special purpose forests for scientific, teaching and education have their own management plans developed by Forestry Faculty (FF) and accepted by MA and MEPE with nature protection conditions incorporated, and implemented by FF.

Special purpose forests for golf or camping site have their own management plan developed by CF Ltd and accepted by MA and MEPE. The main purpose of those forests is not production but management is allowed under special conditions defined by the management plan and such having conditions of nature protection incorporated. Implementation of the management plan is done by state or private company or the institution which is responsible for that golf or camping site.

Park forest: Park forests are forests usually close to the urban dwellers and designated for recreational, tourist and health purposes. They are protected by local government (County or City of Zagreb). The City of Zagreb is the local public institution responsible for all protected areas in County of City of Zagreb territory, except National and Nature parks which have their own public institution established. There are two types of Park forests under the same protection level:

a) *natural forests* which are close to the cities of villages and have special features that are attractive for visitors and serve as recreational area. They are part of management units of managed forests but they are managed under special conditions of nature protection and with different management goals that are in line with the goals of the local government. The management plans are developed in cooperation with all institutions responsible for such forests but daily management is with CF Ltd. Those Park forests are FSC certified (as part of the rest of CF ltd).

b) *planted forests* close to the towns or villages with the purpose to serve as recreational area for the citizens. Those forests are planted usually on municipality ground and management stays under the jurisdiction of a municipality or County (a group of municipalities form a County). These local governments develop a plan of protection and preservation and use for each specific area. Such plans are not publically available and are of different qualities. Those Park forests are not FSC certified either as they are not part of the country-wide General forest management plan. This means that it cannot be assessed if HCVs are at risk here. In total this is 261 ha in the whole country and therefore neglectable for this CNRA.

Protective forest. Management (FMP required):

Protective forests: managed by CF Ltd or private owners as forests with the main role to protect land, water and infrastructure. Those forests are part of productive forests but they are excluded from normal management due to its importance to protect watersheds or soil from erosion, infrastructure from strong winds etc. Forest management plans are needed and these should be accepted by MA and MEPE and have additional nature protection conditions incorporated, besides normal forest management plan conditions.

HCV, Natura 2000 and maps (lit 4,32,66,67,87)

All forest habitats in Croatia (except sub-Mediterranean forests of the Pubescent oak (*Quercus pubescens*)) belong to Natura 2000 habitat types protected by the Habitats Directive. A representative part of each Natura habitat type as well as forests important for Natura species are designated as Natura 2000 sites. Some habitats cover major areas, such as the Common beech (*Fagus sylvatica*) forests or forests of the Pedunculate oak (*Quercus robur*) and the Sessile oak (*Quercus petraea*). The distribution of other habitats is limited, such as the relict forests of the European yew and limes Tilio-Taxetum, or Scots pine forests Helleboro-Pinetum. Beech is the most widespread tree species, while oaks, especially Pedunculate oak is the most important from an economic point of view (lit 4). Although Croatia is working for a long time on the implementation of Natura 2000, it is not finished yet. Croatia has amended the Law on environmental protection in February 2018 and management plans are now obligatory for Natura 2000 sites (previously they were optional). The new Law on environmental protection specifies that management plans include analysis of target species and habitat types, conservation objectives, measures/means of achieving favourable conservation status, activities and indicators for monitoring management plan implementation. Croatia is still in the implementation stage with these Natura 2000 management plans, as can be expected because it is a lot of work to develop the system and implement it.

There are 2 main GIS portals in Croatia.

The '[Bioportal](#)' is connected to Natura 2000 and maintained by the Ministry of Environment protection and Energy. On this portal you will find all Natura2000 sites.

The '[Geoportal](#)' is mainly connected to forests and is maintained by CF Ltd. Here you can find maps of all types of protected areas.

All information is publically available. There is no direct link made to HCV's, for this you will need to explore Forest Management Plans and corresponding maps. These are also publically available, but not online.

The final list of Natura2000 sites (SPAs and pSCIs) was adopted in September 2013 by the Government. The Ecological network Natura 2000 covers 36,67% of land territory and 16,39% of inland waters and territorial sea, putting Croatia at the top with Slovenia and Bulgaria in terms of percentage of the land territory included in Natura2000. 742 proposed Sites of Community Importance (pSCIs) (of which 171 sites are cave objects) and 38 Special Protected Areas (SPAs) are included. pSCIs have been defined for 74 habitat types and for 135 species. Out of these, 20 habitat types and nine species are priority ones according to the Habitats Directive. SPAs have been defined for 126 bird species.

Management plans for Natura 2000 sites that exist are adequate (but only a few exist), they contain specific and measurable conservation objectives and specific and concrete measures that should be sufficient to achieve the goals. However, Croatia joined the EU in 2013 and has not monitored the conservation status for long enough so that it could be confirmed that the measures will result in achieving the goals. There was no systematic national biodiversity monitoring before

the EU memberships (due to lack of funds, or number of experts engaged in monitoring). Objectives and measures are based on best available scientific knowledge, so these can only be improved after a certain time of implementing the measures and tracking their impacts. It is important to note that many protected area management offices lack capacities (man-power, knowledge, finances, political independence etc.) to carry out the management tasks. In the field, proper management of Natura 2000 sites does not exist (with a few exceptions, such as some national and nature parks) (lit 87). There is thus also no reporting done to the EU as per 2019. Independent stakeholders were publishing a '[Score card](#)' about the progress (lit 87), which is not so positive. Their main conclusions and advises are:

- Develop national monitoring programs for Natura 2000 species and habitat types in order to secure and support monitoring efforts at both national and local level.
- Raise capacities of regional (county) administration regarding appropriate assessment procedures.
- Improve the system of developing appropriate assessment studies in a way to secure more independence for experts and evaluators, better data quality and availability, and transparency.
- Enable appropriate measures to be implemented when monitoring of the project shows deterioration of protected species and habitats.
- Significantly improve the enforcement of the Nature Directives by increasing the capacity of the nature conservation inspection, but also other inspections and police with regard to Natura 2000, as well as invest in citizens "inspection".

The following forest habitats are present in the country according to Natura2000:

Table 4: Forest habitats included in Natura 2000 network (lit 39,66,67)

Habitat code	Name of forests association
9110	<i>Luzulo-Fagetum</i>
9130	<i>Asperulo-Fagetum</i>
9160	<i>Carpinion betuli</i>
9180	<i>Tilio-Acerion</i>
91E0	<i>Alno-Padion, Alnion incanae, Salicion albae</i>
91F0	<i>Quercus robur, Ulmus laevis, Ulmus minor, Fraxinus excelsior or Fraxinus angustifolia</i>
91H0	<i>Quercus pubescens</i>
91K0	<i>Aremonio-Fagion</i>
91L0	<i>Erythronio-Carpinion</i>
91M0	<i>Panonic forests of Quercus pubescens and Quercus Cerris</i>
91R0	<i>Genisto januensis-Pinetum</i>
9260	<i>Castanea sativa</i>
92D0	<i>Nerio-Tamaricetea</i>
9320	<i>Olea and Ceratonia forests</i>
9340	<i>Quercus ilex</i>
9410	<i>Vaccinio-Piceetea</i>

9530	Sub-mediterranean forests of endemic <i>Pinus nigra</i>
9540	Mediterranean forests of endemic <i>Pinus spp</i>

Main threats to HCVs from forest management activities

According to the 5th National Report to the Convention on Biological Diversity (lit 4,48) the main forest threats in the reporting period were pollution of air, soil, and water.

Quality and health of the forest

The dieback of trees because external (climate-related factors) is also happening in the Croatian forests. The indicator of forest health is often expressed as the percentage of dieback (reduction in the number of needles or leaves) of forest tree crowns. Nevertheless, this is not directly related to forest management (lit 1).

Illegal logging and 30% of private forests without forest management.

With about 80% of state-owned forests in the Republic of Croatia, which is managed by a company, which is also owned by the state, the status and the issues related to illegal logging are under direct supervision of the police, forest inspection and security services. Along with this supervision and according to the provisions of the Law on Forests, the specialist and security services of the State forest company carry out other specialist tasks in private forests. Among the difficulties encountered in the supervision and prevention of illegal logging in the private forests is the high fragmentation and the high number of forest owners: 600 000 owners are registered. The average property size is 1,10 ha. Of these areas 30% is not yet under forest management. HCV's are thus at risk because of a lack of forest management planning (lit 1,3,65,89).

No forest management because of landmines.

In the process of becoming independent (during the war), almost one-third of its territory, including forests, became inaccessible. This mostly because of unexploded mines. On these areas, state and private, the illegally cut wood mass ended in private hands and was exported and sold out of the territory of the Republic of Croatia. Today it is difficult to estimate the cut and stolen wood because most parts of these forests are still mined, and the process of removing mines is still going on (lit 59). Reports about illegal harvesting or court cases in the forest sector are not publically available.

Of all suspicious areas with risks of minefields 95% are placed in forests and forests lands. At the moment (2019) the total 'mine suspicious' area in state owned forests comprises 31 200 ha, and 2 600 ha in private forests. This is around 1,36% of the total forest area in Croatia. CF Ltd systematically finances the demining process in cooperation with Ministry of Agriculture and Croatian Mine Action Centre ([CROMAC](#)). The national plan is to clear all mines by 2025. Based on the 2019 annual plan 15,4% of the current mine land will be cleared from mines. HCV's are thus at risk in mine areas because of a lack of forest management planning.

Table 5: Forest areas to be cleared from mines in 2019th. Source: [Annual plan of CROMAC](#) for 2019th:

County	Area (ha)	Parts of HCVFs
Karlovac	400	Natura 2000
Lika-Senj	1 006	Nature Park Velebit and National Park Plitvice lakes
Osijek-Baranja	1 060	Nature Park Kopački rit
Požega-Slavonska	3	
Sisak-Moslavina	327	
Šibenki-Knin	20	
Zadar	312	Nature Park Velebit
Total	3 128	

Source types (lit: local experts)

The CNRA analysis below is based on so called 'source types'. A source type is a timber/NFTP source with similar geographical and/or functional characteristics with a homogenous risk designation. These are potential sources from which timber could enter the market, and end up in the supply chain of FSC certified timber processing companies. Such source types need to be defined because risks could be different with each of them. During the analyses the following source types were identified that could, in theory, result in different risks in the assessment:

- State owned forests in Semi-natural permanent forest. Various state organisations. For production purposes. Most (96,6%) is FSC certified.
- Private forest in Semi-natural permanent forest. Small, medium and large private owners. For production purposes. Some FSC certified.
- State owned protected forests. Various state organisations. For protection purposes. Most (96,6% is FSC certified).
- Private owned protected forest. Small, medium and large private owners. For protection purposes. Some FSC certified.
- Plantations. State owned. For production purposes. All FSC certified. Plantations and other forest cultures take around 2,98% (lit 1). Such plantations are almost all owned and managed by the State company "Hrvatske šume d.o.o" (CF ltd), The amount of private plantations is neglectable (4 429 ha) and not a separate source type.

During the detailed assessment it became clear that state and private forest owners were subject to the same risks and a further separation was not needed. In the detailed assessment down below the risks were thus judged at 'country level'.

Each of the HCV categories mentioned below is thus assessed against the source types mentioned above. This will often result in a separation between state and private.

- HCV 1 - Species diversity
- HCV 2 - Landscape-level ecosystems and mosaics
- HCV 3 - Ecosystems and habitats
- HCV 4 - Critical ecosystem services
- HCV 5 - Community needs
- HCV 6 - Cultural values

Experts consulted

	Name	Organization	Area of expertise (category/sub-category)
1.	Dijana Vuletić	Croatian Forest Research Institute, Division for international scientific cooperation in South East Europe.	CNRA cat 3, leading expert for HCVs in Croatia.
2.	Todora Rogelja	Ph.D. Candidate in Land, Environment, Resources, and Health. Università degli Studi di Padova, Padova (Italy)	CNRA cat 3, HCVs situation in Croatia and other surrounding countries.

Risk assessment

Indicator	Sources of Information	HCV occurrence and threat assessment	Geographical/ Functional scale	Risk designation and determination
3.0	See literature list down below and in the text in the column to the right.	<p>a) Are there data available, sufficient for determination of HCV presence and distribution within the area under assessment, according to the requirements of this document?</p> <ul style="list-style-type: none"> Indicator 1&3. Croatia signed 'The Convention on Biological Diversity' (CBD) and has to follow EU regulations about protection of species and habitat throughout the Natura 2000 system. Therefore, a lot of official reports and statistics are available (lit 4,38,87). There are also several online map systems publically available (lit 32,38). Following the used literature and discussions with expert there are no major knowledge/data gaps in relation to important HCV areas. Indicator 2. General sources are available to judge the presence of Landscape-level ecosystems and mosaics (lit 35-38,46,83,85). Indicator 4, the assessment of critical ecosystem services has been separated in various parts and there are several sources available to assist in reaching conclusions (lit 42,43,60) Indicator 5, about community needs. There are general sources (like The Indigenous World) and the judgement of indicator 1.13 & 1.15 and 2.3) that could guide us towards a conclusion. Besides that some specific sources are available (lit 42,43,57,58,70,71,72) Indicator 6: The Register of Cultural Heritage is an official collection of data on immovable cultural heritage in Croatia. The Register is managed by the Ministry of Culture. Information is publicly available (lit 42,43). More general sources are also available. <p>In Croatia there is sufficient information and data available to draw conclusions about the HCV presence and distribution within the area under assessment. See introduction text above and literature list below for more details. With each of the HCV categories below the relevant literature is mentioned.</p> <p>b) Are there data available, sufficient for assessment of the threats to HCVs from forest management activities according to the requirements of this document?</p>	<u>Geographical scale:</u> Country	<p>Low risk.</p> <p>The following thresholds are met: (1) Data available are sufficient for determining HCV presence within the area under assessment; and (2) Data available are sufficient for assessing threats to HCVs caused by forest management activities.</p>

		<p>The sources mentioned above provided enough quality data to be able to carry out a reliable assessment.</p> <ul style="list-style-type: none"> • Indicator 1&3. Good quality official reports, statistics and maps are available. • Indicator 2. Statements in general sources, local expert views and overall reports provided enough information. • Indicator 4, about the assessment of critical ecosystem services have been separated in various parts and there were many sources available to assist in reaching conclusions. • Indicator 5, about community needs. Mentioned sources and expert views provided enough and reliable information to reach a risk conclusion. • Indicator 6: UNESCO is publishing reports about the status of Cultural Heritage in the country and facts. <p>In Croatia there is sufficient information and data available to draw conclusions about the threats to HCVs from forest management activities. See introduction text above and literature list below. With each of the HCV categories below the relevant literature is also mentioned.</p>		
3.1 HCV 1	Lit 1,4,7,8, 9,10,15,17, 19,20,21,38, 39,40,47,52, 53,54,65,76, 86,87,88	<p>Species diversity; Introduction Forests in Croatia does contain HCV 1.</p> <p>Croatia has identified, registered and protected HCV 1 mostly in their <i>Strict Reserves</i> and <i>National Parks</i> (see overview text). Thus in principle is should be enough to check the situation in these protected areas, but we apply the precautionary approach and assess the situation on a wider scale. In theory it could of course happen that HCV 1 is also found in other areas. We therefore assume that HCV's can appear and occur anywhere in the country, in any forest (production (including plantation), protective and special purpose), with any type of owner.</p> <p>Methodology used During the assessment we should verify if all HCV's and <u>identified</u>, <u>protected</u> and if their <u>survival is guaranteed</u> in the long term. The system of assessment has a top-down approach.</p> <p>A) We assess if international agreements are implemented like CBD and Natura 2000. They come with hundreds of rules. If both of these are 100% implemented this guarantees that ALL red-list species should have been <u>identified</u>. This is what Europe and the international community agree amongst each other, thus there is no reason to doubt this. In case CBD and Natura2000 are NOT well implemented this is then found in reports.</p>	<p><u>Geographical scale:</u> Country</p> <p><u>Functional Scale:</u> Type of forest area - Natural forest - Forest plantation</p> <p>Protection scheme: -Protected areas -Non-protected areas</p>	<p>The following thresholds are met:</p> <p>For private forests without Forest Management Plan:</p> <p>Specified risk (8) HCV 1 is identified and/or its occurrence is likely in the area under assessment and it is threatened by management activities.</p>

	<p>B) We assess what the daily practise is, in the field, with felling/harvesting licenses. The country can have all the international agreements signed and implemented, but if there is no proper law and permit system HCV's will never be well <u>protected</u>. Thus we simply check if laws and regulations are in PLACE. If so it means that officially our plant is now <u>identified AND protected</u>.</p> <p>C) Law enforcement. What does this mean in reality, unofficially? If there is much illegality HCV's can still be destroyed. Thus we check law enforcement and the real protection in this sub-section.</p> <p>D) Biodiversity level increase? Now: assuming that all of the above is well implemented: are we sure HCV's will <u>survive</u> in the long run? Should we do even more? In this sub-assessment we check the survival guarantees. We do this on species level.</p> <p>For each of the 4 analytical steps, we give an indication of a specified risk or low risk. In section E), this is summarized in one table, with the final conclusion for indicator 3.1.</p> <p>A) Implementation of the International agreements (Natura 2000 and CBD) (lit 4,38) CBD: Croatia signed 'The Convention on Biological Diversity' (CBD) in 1992 and the Nature Protection Directorate, part of Ministry of Environment and Energy is responsible for its monitoring and reporting in the country. The CBD Strategic & action Plan for Biodiversity 2017-2025 is followed as a guideline for implementation. The latest reporting is done throughout the '5th national report'. Thus the country is complying with report deadlines.</p> <p>The first National Strategy and Action Plan for the Protection of Biological and Landscape Diversity of Croatia was adopted in 1999, the second in 2008 and the third in 2011. The current strategy and action plan runs from 2017 to 2025. The Nature Protection Strategy and Action Plan for the period 2017-2025 is the core nature protection document of the Republic of Croatia. The Strategy includes guidelines of the global Strategic Plan for Biodiversity 2011-2020, adopted at the 10th meeting of the Conference of the Parties to the Convention on Biological Diversity, held in Nagoya, Japan. During the Strategy drafting process, five strategic goals have been defined, and aligned with the EU Biodiversity Strategy to 2020. As stipulated by the Convention on Biological Diversity, the Strategy serves as an instrument that ensures the implementation of the main objectives of the Convention, also ensuring the integration of biodiversity conservation measures into relevant sectoral or cross-sectoral plans, programmes and policies. In order to conserve and ensure long-term survival of wild species, and favourable status of habitats, thus fulfilling the commitments of the Republic of Croatia at both, the global and the EU level in the forthcoming period, the Strategy includes the following strategic goals, which encompass specific objectives and activities stemming from them:</p> <ol style="list-style-type: none"> 1. Increase the effectiveness of key nature protection mechanisms. 2. Reduce the direct pressures on nature and promote sustainable use of natural resources. 3. Strengthen the capacities of nature protection system. 	<p>For the rest of the country:</p> <p>Low risk (7) HCV 1 is identified and/or its occurrence is likely in the area under assessment, but it is effectively protected from threats from management activities.</p>
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	<p>4. Increase the knowledge and availability of data on nature. 5. Raise the level of knowledge, understanding, and support for nature protection among the general public.</p> <p>Croatia is well underway with the CBD implementation. In the 5th report the following results are stated:</p> <ul style="list-style-type: none"> • Inventory of species and habitat types for the purpose of defining the sites of the ecological network Natura 2000. Systematic inventory activities were concentrated on species and habitat types for which sites of Natura 2000 are designated (226 species and 74 habitat types). • All Natura 2000 sites are now declared and registered (also on GIS maps, open for the public). • All required legislation has been fully harmonized with the EU. • Institutions in nature protection, especially on national level, were strengthened and their capacity building, mostly using EU pre-accession funds. • In order to achieve the objectives, 302 action plans were planned to be carried out, divided within 7 thematic issues. An action plan can handle about 1 specie, for example. At this moment many of these plans still have to be finalized. • Regarding ecosystems and habitats, significant activities have been implemented identification of distribution of Annex I habitat types present in Croatia and their designation as Natura 2000 sites. Mapping is now finished. • Red lists have been updated. • Legislation on genetically modified organisms (GMOs) has been harmonized with EU directives and Biosafety Protocol and institutional framework established. <p>There are no CITES (tree/wood) species occurring in Croatian forests. Amendments in related regulations and laws are introduced in the last 15 years in order to systematically categorize the designation of many protected areas which are now all included in the CBD planning (lit 19,20,21,39,40).</p> <p>Natura 2000: As a response to Natura2000 Croatia raised the 'Ecological Network' soon after they joined the EU in 2013. All Natura2000 sites are part of this network. And the Ecological Network term is also used in the regulations (lit 39,40). Almost all forest habitats in Croatia, belong, or are going to belong, to the ecological network (Natura 2000). And although Croatia is working for a long time on the implementation of Natura 2000, it is not finished yet. Croatia has amended the Law on environmental protection in February 2018 and management plans are now obligatory for Natura 2000 sites (previously they were optional). The new Law on environmental protection specifies that management plans include analysis of target species and habitat types, conservation objectives, measures/means of achieving favourable conservation status, activities and indicators for monitoring management plan implementation. Management plans for Natura 2000 sites that exist are adequate (but only a few exist), they contain specific and measurable conservation objectives and specific and concrete measures that should be sufficient to achieve the goals. However, Croatia joined the EU in 2013</p>		
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and has not monitored the conservation status for long enough so that it could be confirmed that the measures will result in achieving the goals. There was no systematic national biodiversity monitoring before the EU memberships (due to lack of funds, or number of experts engaged in monitoring). Objectives and measures are based on best available scientific knowledge, so these can only be improved after a certain time of implementing the measures and tracking their impacts. It is important to note that many protected area management offices lack capacities (man-power, knowledge, finances, political independence etc.) to carry out the management tasks. In the field, proper management of Natura 2000 sites does not exist (with a few exceptions, such as some national and nature parks). There is thus also no reporting done to the EU as per 2019. Independent stakeholders were publishing a '[Score card](#)' about the progress and most of the remarks above are can be traced back to that document (lit 87).

Court cases: EU Commission vs Croatia

No court cases between the EU commission and Croatia about environmental issues related to the implementation of Natura 2000 can be found (lit 88). This shows that the country is on track with the implementation of Natura 2000 (many other countries have court cases).

Summary of findings

All forest areas that are critical to conservation are now designated as protected areas at national or EU level (Natura 2000). Following the used literature and discussions with local experts there are no major knowledge/data gaps in relation to important HCV areas. Croatia continues to implement the National Biodiversity Strategy, based on the international CBD requirements. And this national strategy is properly converted into laws and regulations.

B) Daily practise in the field with felling/harvesting licenses

The right to manage a forest property in Croatia is limited and carried out in such a way that ecological, social and production function of the forest is ensured. The main legal framework of forestry represents the Law on Forest of 2018 with amendments (lit 10) and the Law on environmental protection of 2013 with amendments (lit 19,20). Various other laws and regulations are implemented that handle about forest protection. There is also a Strategy and Action Plan for Nature Protection (2017-2025) (lit 47) and the country-wide Forest Management Plan as a result of that (lit 1).

All forests in Croatia are multi-functional. According to the purpose, the forests in Croatia are divided into 3 main groups and the following procedures are in place:

1. Commercial or productive forests. All activities done are based on forest management plans. All national and international legislation, conventions, strategies and action plans on nature conservation are included in forest management plans. Forest Owners are responsible for proposing the forest management plans, that further need to be approved by the Ministry responsible for forestry. For state forests, forest management plans are done by the Public company Hrvatske šume (except for forests managed by other public legal subjects, such as Ministry of Defense). For private owners Forest Management Plans are

		<p>often done by registered experts. Forest management plans are done for 10 years, and for their implementation, Operational Annual plans are developed.</p> <p>All forest owners (including private) are thus obliged to register in the Forestry register, administrated by Ministry for Agriculture (lit 53, 54). They are obliged to have a Program for managing private forests (a Forest Management Plan) and Operational annual plans for implementation. For small and middle private forests all planning is done by the Croatian Agricultural and Forestry Service, which was in 2019 joined with the Ministry of Agriculture. There are also funds for small owners to assist them with the process. In case such Program for managing private forest is not developed the Ministry responsible for forestry issues a special permit called a '<i>Decision for the removal of trees</i>' (lit 10) when this is not contradicting the regular Forest laws (lit 10) and regulations.</p> <p>A part of the private owners (30%) does not have Forest Management Plans in place. If such owners want to harvest trees the Ministry responsible for forestry issues a '<i>Decision for the removal of trees</i>' (lit 10). This is a temporarily solution and not based on larger plans or detailed environmental impact studies. These documents are issued by local offices and it is assumed that there is a 'grey' interpretation area. And although local governmental 'experts' do visit the field to mark the trees that could be harvested we could not guarantee an equal quality of judgement.</p> <p>The marking and felling are prescribed by the '<i>Ordinance on the marking of trees, marking of wood assortments, compensations and forestry order</i>', which was amended in 2017 (lit 52). It prescribes the way and documentation for marking the trees for felling, marking and documentation for wood assortments, and, as well as necessary documentation for transport of wood and wood assortments (transport certificate).</p> <p>Based on the approved annual plans marking trees for harvest is possible. The marking of trees in forests and on forest land is done by a forestry contractor who possesses the corresponding license of the Forestry Chamber and based upon the Request for marking. State and big private forest owners are obliged to enter the data on trees marked for felling into an electronic Register of records, while for small and medium forest owners the registration is done by the Ministry for agriculture. In all forests, only the removal of marked trees is allowed. No further permits are needed because all harvesting should be in line with the annual plans and registered in the Register of records.</p> <p>There are amendments made to the Ordinance on the Marking of Trees, Marking of Wood Assortments, Compensations and Forestry Order from 2017 (lit 52) for the purpose of establishing traceability in accordance with the EU Timber Regulation (EUTR). This to guarantee properly labeled wood assortments (technical wood and spatial wood) for which a transport certificate is needed. Such document lists the load from the first storage location to the final processing site. When replacing on the market and transport, the owner of the wood assortments shall have copies of all accompanying documents and other relevant documentation (invoice, etc.) proving the origin of the purchased goods (lit 52). With private forest owners such transport certificates are to be issued by a forestry contractor who possesses the</p>		
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	<p>corresponding license of the Forestry Chamber. In case of State forests these are issued by Public company Hrvatske šume (lit 88).</p> <ol style="list-style-type: none"> 2. <u>Protective forests</u>. In these forests forest management activities are limited and production of wood assortments is a result of silvicultural work. Management of protective forests is done by the forest owner in accordance with forest management plans. The organization and procedure of harvesting the wood and wood assortments from protective forests is the same as described in productive forests above, but extra regulations about protection are to be complied with. 3. <u>Special purpose forests</u>. In the forests from the category of strict reserves Law on environmental protection (lit 19-21) forbids all economic activities, and in the category of national park economic use of natural goods is prohibited. For forests and forest land in the area of the national park and strict reserve, separate management units are developed and in charge for adopting a Forest protection program which contains measures for their protection. Forest operations are done in accordance with forest management plans for management unit which set out the conditions for fair use forests and forest land and interventions in this area, the required scope of forest breeding and protection, possible degree of utilization and conditions for the management of the animal world. In general, all strict reserves and national parks do not have forest management plans (lit 1), nor is this required. In other protected areas commercial and other activities are allowed under the condition that they do not endanger or alter significant characteristics of the protected area, according to the forest management plans (lit 1, lit 19-21). <p>Special notes about Management for Strict Reserves and National Parks: <i>Strict Reserve:</i> In a strict nature reserve economic and other activities are prohibited. <i>National Park:</i> In National Park economic activities are not allowed when it concerns forest management. Only some protective measures can be allowed meaning cutting the trees which present threats to visitors or trails or any other objects and it is done based on specific permit issued by the Park manager from the Ministry. Every National Park has a Management Plan and Program for protection and improvement of natural features approved by the responsible Ministry. These forests are not part of FSC process as they are excluded from management.</p> <p>In case timber is harvested in such sites the normal procedures take place with regards to marking, felling and the transport of timber (see above under production).</p> <p>The State Inspection service also includes the forestry and hunting inspection and is in charge with law enforcement on forests and forest land owned by the state and private. There are state inspectors and regional inspectors. The inspection service can also request the help of the Forestry Chamber to judge the technical quality of the work carried out in the field (lit 7). Inspections are taking place throughout the country.</p> <p><i>Summary of findings</i> Overall laws and regulations are aiming for sustainability, production and protection of HCVs. With regards to harvesting the regulations are strict. Maybe there is a doubtful role of the mentioned forestry contractors (who</p>		
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possesses the corresponding license of the Forestry Chamber). In theory they could develop the Forest Management Plans (FMP), design the annual plans, register the marked and harvested trees, do the harvesting and issue a transport document. And although the FMP, the annual plans and the online Register of records are evaluated by state, and inspections take place, there is a potential conflict of interest with private landowners. Nevertheless, such contractors need licenses for each of these jobs separately, need to pass an exam for each of them and have to follow update training courses at regular intervals. They can also lose their license when mistakes are made.

Nevertheless, the above seems to be a robust enough system to protect HCVs.

C) Law enforcement

Illegal harvesting. There are no publically available reports by the government about illegal harvesting, court cases or State inspection reports in the forestry sector. Such is also not reported in the annual reports of the Ministry of Agriculture (lit 7), Hrvatske šume Ltd (lit 8), the Croatian Agricultural and Forestry Advisory Service (lit 9), the Ministry for Environmental Protection and Energy (lit 15) or the Croatian Agency for Environment and Nature (lit 17).

International sources like FAO (global forest resources assessment 2015) (lit 65), Chatham House (Illegal Logging Portal) (lit 76), Global Forest Watch (lit 84) and Forest Europe (lit 86) are not reporting anything either. One older report by the UNECE ([Republic of Croatia illegal logging and trade of illegally-derived forest products](#) 2004), does not report anything significant and is too old anyway. There are no other official international reports or international messages about substantial illegal harvesting inside Croatia. The country is not associated with or designated as source of conflict timber according to latest available research.

Over the years the forest area shows an increase of 8% since 1986 or 0,24% per year. And although that doesn't say much about the quality of that forest, the lack of absence of any media news or data in international reports are further guarantees that things are under control. An alternative way to look at it is to look at the increase (or decrease) of the growing stock. When the growing stock is decreasing this is a signal that forests are overharvested with this will decrease the 'nature' values and thus biodiversity levels. When the growing stock is increasing it means forests are getting older, there is less disturbance and species and habitats have more time to recover from management. Overall this will increase biodiversity.

Growing stock assessment (lit 1,3,6,18).

The total growing stock in the forests of Croatia is 418 618 277 m³, based on management plans and estimated growing stock for the forest areas without management plans. With a total forest area of 2 496 928 ha this leads to 167 m³/ha. This means a very healthy forest in Europe.

In the period 2006 to 2016 growing stock increased by 5 % (20 658 m³). 80% of the growing stock is in the state forests, while 20% is in private forests. The annual increment is 10 146 149 m³, or 5,87 m³/ha. In the past ten years, a total allowable cut was realized on the surface of 783 4048 ha or 60% of the managed area and the cut was 56 160 375 m³ or 86% of the allowable cut. The realized cut in private forests for the same period was 2 392 543 m³ (34% of allowable cut). This means that the stock will keep on growing when the

	<p>Annual Allowable Cut is not actually harvested. That is also good news for species as forests in general become older, taller, more natural and left undisturbed for a longer period of time.</p> <p>D) Biodiversity level increase? By looking at the biodiversity level improvements over the last years we could decide if all implemented regulations and enforcement actually result in increased biodiversity levels. We realize that such levels only increase after some time, so a proper interpretation of results is needed (which we will do below). We also realize that, in most countries, it seems that climate change is having a bigger than average impact on the biodiversity. This means that species are replaced by other species because the country itself turns into a different climate (CBD lit 4).</p> <p>Croatia did not yet report anything on Natura2000, thus that source of information is not available. Systematic inventory activities for Natura2000 are scheduled and/or carried out and is concentrated on species and habitat types for which sites of Natura 2000 are designated (226 species and 74 habitat types). But no results are published yet.</p> <p>Besides this there is also little national monitoring done in the past in the country. Nevertheless, there are national monitoring programs for 53 species and 5 habitat types. Practice so far has been that monitoring programs were being developed by the local management authorities, NGOs, scientific institutions, or projects.</p> <p>Nevertheless, there are the CBD reports (lit 4). In the 5th CBD report the following conclusions are drawn:</p> <p>The main forest threats in the reporting period were pollution of air, soil, and water. The Fir (<i>Abies alba</i>) was being the most sensitive to air pollution; changes in water regime due to inappropriate water management activities; transport and other infrastructure corridors built through the large forest complexes; conversion of forest land into building and/or agricultural land; forest fires especially in the Mediterranean part of Croatia (see indicator 3.4 below) and land-title and forest management planning problems with private forests (lit 4, related to the absence of Forest Management Plans in some cases).</p> <p>In the CBD report there are 20 so called 'Aichi' targets identified, of which 2 are important for biodiversity. Target number 5 is about habitats, and is presented under indicator 3.3. And target number 12 reads: <i>By 2020 the extinction of known threatened species has been prevented and their conservation status, particularly of those most in decline, has been improved and sustained.</i></p> <p>The response to this by Croatia is the following:</p>		
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Threat assessments for 2954 species have been prepared. 1336 species have been categorized as threatened (IUCN categories CR, EN and VU). Population trends and changes of status of individual species are still not known but will be available upon revision of red lists, using recent IUCN methodology. According to EU directives, Croatia is obliged to monitor and report to the EC on conservation status of 506 species and 74 habitat types. A number of monitoring protocols have been prepared and implementation of some started.

Table: Number of threatened species over the years (CBD national reports 3,4 and 5).

Classification	2014 (5 th report)			2009 (4 th report)			2005 (3 rd report)		
	Total species	Endangered/Threatened	%	Total species	Threatened	%	Total species	Threatened	%
Mammals	116	8	8%	101	8	8%	101	19	19%
Birds	246	56	27%	230	95	24%	234	86	23%
Reptiles	39	6	15%	41	15	37%	38	10	26%
Amphibians	20	2	10%	20	4	20%	20	6	30%
Fish (freshwater)	153	61	40%	152	64	42%	150	76	51%
Average			20%			26%			30%

The table above shows the overall group of 'threatened and endangered species'. There is some fluctuation over the years but overall the measured group seem to be stable. 30% of all species were listed as threatened and endangered in 2005 and this was 20% in 2014. Most groups decreased, except for birds.

No further reports, online statistics, or databases are available.

The above picture confirms indeed that Nature is recovering but needs more time, even with all protection measures in place. We realize that such levels only increase after some time, thus conclusions based on this assessment will only act as guidance.

With regards to habitat (and species) improvements we have seen a similar conclusion in other EU countries. Even with everything implemented and a proper law enforcement the improvement levels are not yet convincing. We may conclude that CBD (and Natura 2000) is not effective enough. Recently the EU announced [15 new actions](#) to be carried out by 2019, this to improve the situation. We should also take the climate change into account which is resulting in a new mix of species in every country. Rare species will become abundant while common species will migrate to other regions. This makes future HCV assessments a challenge.

		<p>E) Conclusions and applicable to all source types?</p> <p>Any forest cannot be felled without following the strict local procedures, which are the same in all cases. That means that we do not need to make a distinction between private or state owners in this assessment when they have a Forest Management Plan in place. It also doesn't matter if we analyze the situation in production or protective or special purpose forests. This means that we draw a conclusion for all source types at once.</p> <p>Based on all of the above we may conclude that Croatia is well underway to protect species and biodiversity, from a legislation point of view. We may also assume that the daily practise in the field, with marking of trees and registering in an online system, and the online map systems with protected areas are good enough, and publically available, to guarantee a proper implementation of laws without much room for doubts and mistakes. We may also assume that law enforcement is in place, and equal for all ownership types. Although there are no publically available reports to back up this statement there are also no signals in the media or in international documents that illegal harvesting takes place. Besides this the amount of forests in increasing over the years and standing volume (stock) is increasing as well. This is further proof that no forest is lost, and there is no overharvesting.</p> <p>Biodiversity levels still need to improve, but regulations are in place. Almost all state forests managed by CF Ltd is FSC certified (96,6% of all state owned forests), which is a guarantee by itself because it means that most of the forest in Croatia is well managed.</p> <p>However, a part of the private owners (30%) does not have Forest Management Plans in place. Here we should take the precautionary approach because there is no strict guarantee that HCV's are not harmed.</p> <table border="1" data-bbox="443 775 1715 1002"> <thead> <tr> <th>A) CBD</th> <th>B) felling/harvesting licenses</th> <th>C) Law enforcement</th> <th>D) Species status</th> <th>E) Overall risk</th> </tr> </thead> <tbody> <tr> <td>Low risk</td> <td>Specified risk for private owners without Forest Management Plan. Low risk for all others.</td> <td>Low risk</td> <td>Low risk</td> <td>Specified risk for private forests without Forest Management Plan. Low risk for the rest of the country.</td> </tr> </tbody> </table> <p><i>Based on the above sub-assessments we conclude that, for HCV 1, all of Croatia is considered Low Risk, except for private forestss without Forest Management Plans.</i></p>	A) CBD	B) felling/harvesting licenses	C) Law enforcement	D) Species status	E) Overall risk	Low risk	Specified risk for private owners without Forest Management Plan. Low risk for all others.	Low risk	Low risk	Specified risk for private forests without Forest Management Plan. Low risk for the rest of the country.		
A) CBD	B) felling/harvesting licenses	C) Law enforcement	D) Species status	E) Overall risk										
Low risk	Specified risk for private owners without Forest Management Plan. Low risk for all others.	Low risk	Low risk	Specified risk for private forests without Forest Management Plan. Low risk for the rest of the country.										
3.2 HCV 2	Lit 4, 33-37, 75,79,83,	<p>Landscape-level ecosystems and mosaics</p> <p><i>Occurrence of HCV</i></p> <p>There are forest ecosystems in Croatia that meet the <u>national</u> definition for large, landscape-level ecosystems or ecosystem mosaics that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance. There are <u>no</u> landscape level forest ecosystems in Croatia identified that meet the <u>international</u> definition.</p>	<p><u>Geographical scale:</u> Country</p> <p><u>Functional Scale:</u> Type of forest area</p>	<p>The following thresholds are met:</p> <p>For private forestswithout Forest</p>										

	<p>International. The World Resource Institute does not show intact forest landscapes in Croatia in their 2017 'General Atlas of Forest and Landscape Restoration' (lit 79). Ramsar is showing some sites in the country, but these are not forest landscapes because they are protected for other purposes (all are wetlands and coastal areas without forest) (lit 75). The UNESCO Biosphere sites in the country are not including any large scale forest ecosystems either. The sites are aiming for karst landscape (Velebit) and floodplains of the Danube river (Mura). Two other sites are protected because of a lake (Plitvice) and as a geopark (Papuk)(lit 33-37).</p> <p>The Convention on Biological Diversity (CBD) is of course listing all forest types properly but is not declaring them landscape-level forest ecosystems (lit 4).</p> <p>The international Intact Forest Landscapes database does not show any landscape level ecosystems in the country (lit 83).</p> <p>From an international point of view landscape-level ecosystems and mosaics are thought to be extremely rare in Europe, with only forests such as Bialowieza in Poland, being in this category.</p> <p>National. Croatia has identified, registered and protected HCV 2 in their <i>Nature Parks, Regional Parks and Significant landscape</i> (see overview text). Croatia thus protect such sites because they declare that they are important, but they are not recognized as such on an international level with respect to <i>landscapes level ecosystems</i>.</p> <p>Management of these national selected sites: <i>Nature Park (11 parks in country)</i>: In the park, only economic and other activities that do not threaten its basic features and roles are permitted. The method of performing economic activities and use of natural resources in a nature park is determined by the nature protection conditions. Details of these parks can be found in lit 1 & 32 (maps). <i>Regional Park (2 parks)</i>: In the park economic activities are allowed but only if they do not threat its basic features and roles. The Regional park is in jurisdiction of local, regional government and is defined by the county or the City of Zagreb. Details of these parks can be found in lit 1 & 32 (maps). <i>Important landscape (13 site in forests)</i>: Landscape interventions and actions that violate the characteristics that has been identified are not allowed. Their details can be found online on the GIS portal (search under Zaštićena područja – poligoni) (lit 66) .</p> <p><i>Identification and assessment of threats and safeguards</i> From an international point of view landscape-level ecosystems and mosaics does not exist in Croatia. On national level Croatia identified some sites anyway. See above and the overview text for more information. Such sites are safeguarded by laws and regulations as explained in the overview. No further threat assessment is available or published by the national authorities.</p> <p>Any forest cannot be felled without following the strict local procedures, which are the same in all cases. See category 1 of this CNRA. That means that we do not need to make a distinction between private or state</p>	<ul style="list-style-type: none"> - Natural forest - Forest plantation <p>Protection scheme:</p> <ul style="list-style-type: none"> -Protected areas -Non-protected areas 	<p>Management Plan:</p> <p>Specified risk (12) HCV 2 is identified and/or its occurrence is likely in the area under assessment, and it is threatened by management activities.</p> <p>For the rest of the country:</p> <p>Low Risk (11) HCV 2 is identified and/or its occurrence is likely in the area under assessment, but it is effectively protected from threats caused by management activities.</p>
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		<p>owners in this assessment. It also doesn't matter if we analyze the situation in production or protective or special purpose forests. This means that we draw a conclusion for all source types at once.</p> <p><i>Risk Conclusion</i> National declared sites are protected according to the normal laws and regulations mentioned elsewhere in this CNRA. If it comes to a risk assessment for these sites the same applies as under indicator 3.1, because national laws and regulations are the same, also for these sites.</p> <p>Based on indicators 3.1 and 3.3 we may conclude that Croatia is well underway to protect landscape, from a legislation point of view. After all, when species and habitats are well protected it will also mean that landscapes are protected. If landscapes are fragmented it will also result in the loss of species and habitats. We may also assume that the daily practise in the field, with marking of trees and registering in an online system, and the online map systems (lit 32) with protected areas are good enough, and publically available, to guarantee a proper implementation of laws without much room for doubts and mistakes. With a neglectable illegal harvesting rate we may also assume that law enforcement is in place, and equal for all ownership types.</p> <p>A part of the private owners (30%) does not have Forest Management Plans in place. Here we should take the precautionary approach because there is no strict guarantee that HCVs are not harmed (see indicators 3.1 and 3.3 for further information).</p> <p><i>Based on the above, we conclude that for HCV 2, all of Croatia is considered low risk except for private forests without Forest Management Plan, which are specified risk.</i></p>		
3.3 HCV 3	<p>Lit 1,3,4,5,6,7,8, 9,10,15,17,18, 19,20,21,38, 39,40,47,52, 53,54,65,67, 76,83,85,86, 87,88</p>	<p>Ecosystems and habitats Forests in Croatia does contain HCV 3.</p> <p>Croatia has identified, registered and protected HCV 3 mostly in their <i>Special reserves</i> and <i>Natural monuments</i> (see Overview text). Thus, in principle it should be enough to check the situation in these protected areas, but we apply the precautionary approach and assess the situation on a wider scale. In theory it could of course happen that HCV 3 is also found in other areas. We therefore assume that HCV's can appear and occur anywhere in the country and in any type of forest (production (including plantation), protective and special purpose) and with any type of owner.</p> <p>Methodology used With regards to HCV 3, please see HCV 1 for the major sub-assessments (A-C), which are the same (and with the same conclusions) as for this indicator 3.3. The only difference in this indicator is the habitat improvement assessment (sub-assessment D). By looking at the habitat status trends over the last years we can decide if all implemented regulations and enforcement actually result in steady or increased habitat levels.</p>	<p><u>Geographical scale:</u> Country</p> <p><u>Functional Scale:</u> Type of forest area - Natural forest - Forest plantation</p> <p>Protection scheme:</p>	<p>The following thresholds are met:</p> <p>For private forests without Forest Management Plan:</p> <p>Specified risk (17) HCV 3 is identified and/or its occurrence is likely in the area under</p>

	<p>We realize that such levels only increase after some time, so a a proper interpretation of results is needed (which we will do below). For each of the 4 main sub-assessments the country can score a specified risk or a low risk indication. In section E this is summarized in one table, with the final conclusion for indicator 3.3.</p> <p>Priority habitats are included in the Natura2000 network (see overview text). But there is still no reporting done for Natura2000. Therefore, we could not use that list.</p> <p>In theory, the best remaining source of reporting about the status of habitats should be the CBD reports (lit 4).</p> <p>D) Habitat improvements following CBD Aichi targets (lit 4).</p> <p>Following the 5th CBD report the main forest threats in the reporting period were pollution of air, soil, and water. The Fir (<i>Abies alba</i>) was being the most sensitive to air pollution; changes in water regime due to inappropriate water management activities; transport and other infrastructure corridors built through the large forest complexes; conversion of forest land into building and/or agricultural land; forest fires especially in the Mediterranean part of Croatia and land-title and forest management planning problems with private forests (lit 4) (30% of private forests without FMP). In the CBD report there are 20 so called 'Aichi' targets identified, of which 2 are important for biodiversity.</p> <p>Aichi target number 5 reads: <i>'By 2020, the rate of loss of all natural habitats, including forests, is at least halved and where feasible brought close to zero, and degradation and fragmentation is significantly reduced'</i>. The situation in Croatia is the following:</p> <ul style="list-style-type: none"> • The most of natural habitats are decreasing: watercourses and adjacent wetlands due to regulation works; coastal habitats due to building and tourism related activities; grasslands overgrowing due to ceasing of traditional use (mowing and grazing). • Fragmentation of habitats was increased due to increased building of highways and other roads. <p>These are not directly related to forest management but do explain the main threats to habitats, which is important to understand.</p> <p>The CBD reports does not show a trend in habitat improvement or decline, as such is not yet published. They refer to the implementation of Natura2000 (which also didn't show any reporting yet). Nevertheless, there are actions listed what is, and has been, done this far with respect to habitat protection:</p> <ul style="list-style-type: none"> • Procedure of Appropriate Assessment for the ecological network for all plans, programs and projects that may have negative impact on target species and habitat types, has been established by national legislation including alignment and integration with procedures of the government already in place. 	<p>-Protected areas -Non-protected areas</p>	<p>assessment and it is threatened by forest management activities</p> <p>For the rest of the country:</p> <p>Low risk (15) HCV 3 is identified and/or its occurrence is likely in the area under assessment, but it is effectively protected from threats caused by management activities.</p>
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- Draft management plans for 6 Natura2000 sites have been prepared through a special project (2011-2013) with active stakeholders' involvement. Existing management plans of protected areas (which are also Natura2000 sites) adopted a revision, which is needed to adequately protect target species and habitat types.
- Through a special project intensive preparation of monitoring programs has started, and monitoring for some species is conducted. In the reporting period, 64 species and 3 habitat types are covered with the monitoring, which is about 11,7% of species and 4% of habitat types that are on the Habitats and Birds directives.

Other sources

Since several decades the number of hectares related to protected areas is growing (8% since 1986 or 0,24% per year) (Lit 1,3,65). This is of course a good signal for habitat protection.

The international **Intact Forest Landscape** (IFL) website (lit 83) does not list sites in Croatia. Although we are not discussing Intact Forest Landscapes here it does say something about large scale habitats and its potential fragmentation, if they were listed at IFL. But such landscapes does not appear thus we can also not make a judgement.

WWF (lit 85) listed a substantial part of Croatia in their [Mediterranean Ecoregion](#). WWF state that: *The Illyrian deciduous forests encompass coastal areas on the eastern coast of the Adriatic Sea. The region has a relatively high floral endemism rate with many relict and narrow range species. Faunal diversity is high, and a number of IBAs (Important Bird Areas) and threatened SPECs (Species of European Concern) are found within the region.*

Illegal logging, illegal hunting, and uncontrolled plant harvesting have destroyed extensive forest areas that have been relatively intact until recently (till before the war). The mountain ranges of this region have had low human populations, and tall forests still prevail widely throughout. A significant number of pristine large forest stands remained quite untouched until very recently. Rapid and intense forest degradation in the form of illegal logging, pollution, and fire took place during the recent Balkan conflicts that led to the division of the Former Yugoslavia into a number of independent republics.

In the '[Handbook for definition of land habitats in Croatia](#) (lit 67) a very good description is given about all habitats in Croatia. It also lists the major threats to each habitat. But no further statements are made about their status or a trend in history.

In [Biodiversity of Croatia](#) (lit 5, 2006) a good summary is given about forest habitats (page 31). This publication state that *'the conservation status of Croatian forests is very good compared to the European level. As high as 95% of forest components show a natural composition, this is rare and highly valuable in global proportions. The main causes of threats to forests in Croatia include: pollution of air, soil and water (fir is the most affected species), change in water regimes due to water management activities in lowland forests*

(common oak forests are threatened) as well as construction of roads through large forest complexes'. These are not caused by forest activities, however.

Growing stock assessment (lit 1,3,6,18). A low growing stock points to overharvesting or degraded forests and non-sustainable forest management in general. Such management will automatically lead to loss of habitat.

The total growing stock in the forests of Croatia is 418 618 277 m³, based on management plans and estimated growing stock for the forest areas without management plans. With a total forest area of 2 496 928 ha this leads to 167 m³/ha. This means a very healthy forest in Europe.

In the period 2006 to 2016 growing stock increased by 5 % (20 658 m³). 80% of the growing stock is in the state forests, while 20% is in private forests. The annual increment is 10 146 149 m³, or 5,87 m³/ha. In the past ten years, a total allowable cut was realized on the surface of 783 4048 ha or 60% of the managed area and the cut was 56 160 375 m³ or 86% of the allowable cut. The realized cut in private forests for the same period was 2 392 543 m³ (34% of allowable cut). This means that the stock will keep growing as not every m³ that maybe harvested is actually harvested. That is also good news for habitats as forests in general become older, taller, more natural and left undisturbed for a longer period of time.

Conclusions

It is not possible find data about improved, or declined, habitats. Measurement results are not yet available. However, we may conclude that Croatia properly implemented the regulations that were needed to protect habitats, from a legislation point of view. For each Natura2000 habitat type, the State Institute for Nature Protection has created a distribution map with all known localities. Basic input for these maps was data derived from the Red Books in combination with habitat type maps ([online available](#), lit 66). The government is now in the process of measurements and setting the baseline, and revising Forest Management Plans with habitat protection instructions. Further progress reports on the last issue still have to be published.

We may also assume that the daily practise in the field, with strict procedures for harvesting for all forests, and the online map system are good enough, and publicly available.

This guarantees a proper implementation of laws without much room for doubts. There is no further evidence, in national or international sources, that forest management causes habitat loss (climate change and fragmentation in general are).

A part of the private owners (30%) does not have Forest Management Plans in place. Here we should take the precautionary approach because there is no strict guarantee that HCV's are not harmed.

(see for assessment A) to C) under indicator 3.1 above.

A) CBD	B) felling/harvesting licenses	C) Law enforcement	D) Habitat status	E) Overall risk
Low risk	Specified risk for private owners without Forest Management Plan. Low risk for all others.	Low risk	Low risk	Specified risk for private forests without Forest Management Plan. Low risk for the rest of the country.

		<p>Based on the above sub-assessments we conclude that, for HCV 3, all of Croatia is considered Low Risk, except for private forests without Forest Management Plans.</p>		
3.4 HCV 4		<p>Critical ecosystem services. Under HCV 4 we assess if there are forests present and classified as important for erosion control, preventing of flooding, barriers from destructive fire and clean water catchments. We also assess if forest management activities are threatening these areas.</p> <p>Forests in Croatia does contain HCV 4.</p> <p>The government of Croatia have identified, registered and protected HCV 4 mainly in their <i>Protective forests</i>. This means that, when HCV 4 is identified, an area becomes a protective forests and special rules and regulations will be stipulated in the FMP. Protective forests are managed by state or private owners as forests with the main role to protect land, water and infrastructure. Those forests are part of productive forests but they are excluded from normal management due to its importance to protect watersheds or soil from erosion, infrastructure from strong winds etc. Forest management plans are needed and these should be accepted my MA and MEPE and have additional nature protection conditions incorporated, besides normal forest management plan conditions. The following classes are used in Forest Management Plans in Croatia: protection, protection of waterflows, erosion protection, settlement and facilities protection.</p> <p>Forests acting as protection against erosion and flooding. In the Global forest resources assessment 2015 (FAO, lit 65) Croatia shows 73 000 ha for protection of soil and water (this was 53 000 in 1990 and is fluctuating over the years). This is of course a 'global' assessment and mainly based on satellite images. In the case of Croatia (with hardly any erosion problems) the work mainly focused on waterbodies, and its bufferzones.</p> <p>The official national amount of Protective forests in Croatia stands at this moment at 710 137 ha (29% of all forests) (lit 1). This is much more than the FAO global assessment mentioned above and says something about the quality of forest management planning in Croatia. Of course, this is also a result of the the fact that 82% of all forests are already FSC certified and FSC also demands that suchs sites are identified and protected.</p> <p>Forests acting as protection against erosion and flooding are included under the Protective forests class. All such forests are identified in Forest Management Plans as forests on 'sensitive habitats' (slopes more than 50%, on shallow skeletal soil, riverine islands, etc.) and have the function of 'hydrological' or "erosion" protection. These can also be found on the GIS portal (lit 32). Those forests are under special management</p>	<p><u>Geographical scale:</u> Country</p> <p><u>Functional Scale:</u> Type of forest area - Natural forest - Forest plantation</p> <p>Protection scheme: -Protected areas -Non-protected areas</p>	<p>The following thresholds are met:</p> <p>For private forests without Forest Management Plan:</p> <p>Specified risk (22) HCV 4 is identified and/or its occurrence is likely in the area under assessment and it is threatened by management activities.</p> <p>For the rest of the country:</p> <p>Low risk (21) HCV 4 is identified and its occurrence is likely in the area under assessment, but it is effectively protected from threats caused by management activities.</p>

regime and can even have prolonged rotation due to these conditions. Steep slopes or other mentioned areas are just avoided in any forestry works (mandatory, Rulebook of forest management (lit 41). Generally, all forests on steep slopes defined as protective serve to protect against erosion, but there is also wind erosion where forests are not on steep slopes. Protection about flooding is often the case with forests along rivers. Such is also explained in the local FMP when applicable.

In the various annual reports (lit 3,7,8,9) there are no further cases of calamities like soil erosion or flooding caused by forest management activities, nor are there any cases found in international sources (65,76,84,86) or in CBD reports (lit 4). FSC annual audit reports over the last decade are not indicating any problems either (lit 61, 68).

With regards to the presence of forests acting as protection against flooding and erosion, and if these are potentially threatened by forest management activities, the conclusion is that their occurrence is clear in the area under assessment, and it is effectively protected from threats caused by management activities.

Forests acting as barriers for destructive fire.

Officially there are no special forests classified as acting as barriers for destructive fire, and they are also not identified as such. Croatia also does not see the need to set aside such forests as they have another approach to cover the wild fire problem. Thus we need to assess if there is a potential problem with forest fires and if there is a risk of forest management contributing to this problem.

Forest fires in hectares over the years are the following (lit 3 page 269 and lit 65 page 70):

2017	2016	2015	2014	2013	2007	2003
48 543	6 733	6 064	191	1 999	5 219	8 267

The averages over the last decades are stable (average 5 000 ha 0,2% of all forests), till the large fires of 2017 came in. Already in 2014 The State company Hrvatske šume developed a Forest protection plan in accordance with the 'Ordinance on fire protection' (lit 60).

Forest fire danger, length of the fire season, and fire frequency and severity are very likely to increase in the Mediterranean, and will lead to increased dominance of shrubs over trees.

Dry weather and damaged ecosystems with accumulation of dead biomass increase the risk of forest fires and therefore increased climate variability will augment the risk of forest fires. Such damaged ecosystem are caused by droughts and insect plagues, and are also caused by climate change. In the long run we should argue if this, in turn, is also caused by forest management because in the past monocultures were planted throughout Europe and these are more vulnerable to all such problems than mixes with native broadleaves. In addition, forest fires are expected to encourage the spread of invasive species which in turn, have been shown to fuel more frequent and more intense forest fires. An indication of the forest fire risk under the future climate scenarios has been calculated (lit 92). Climate change are usually predicted by experts in various

	<p>scenarios of impact, depending on how the world will react to the current problems. Under different scenarios, fire risk is shown to increase nearly everywhere in the Mediterranean region, especially in inland locations. The southern Mediterranean is at risk of forest fire all year round. In the Iberian Peninsula, northern Italy and over the Balkans, the period of extreme fire risk lengthens substantially.</p> <p>Since 1982 the Croatian forest fire protection programme using the Canadian Forest Fire Weather Index System (CFFWIS, Van Wagner and Pickett, 1985) has been running along the Croatian coastal region by the Croatian Meteorological and Hydrological Service (DHMZ) as part of the Government Programme of Open-Air Fire Prevention (Bertović et al., 1987). The Canadian model is applied to the fire weather indices (FWI) once a day, from April to October, based on real-time meteorological data from 40 synoptic stations using the SYNOP report and predicted for the following day using the products of the ALADIN/HR limited area numerical weather prediction model. Both actual and predicted fire weather indices are sent automatically to the Fire Department each day during the fire season. The actual fire weather indices are also publicly available on the DHMZ website (http://www.meteo.hr). A recent study confirmed the higher fire risks in the last decade.</p> <p>After the 2017 large fires many actions were taken. Existing Forest and fire roads have been cleared, and substantial resources have been invested in early detection of wildfires. The most important technical measure was the establishment of the Firefighting Operational Centre at Divulje near Split, which monitors all the potential crisis situations in the Adriatic parts of the country. Orders are no longer arriving directly from Zagreb. The centre receives all the necessary information in real time. Thanks to cameras placed at the positions which offer the best views of the most vulnerable areas – such as Učka, Lička Plješivica, Srđ, and Korčula – information about wildfires are immediately transmitted to the centre. These cameras can recognize a fire on the basis of changes in the image: as soon as the slightest smoke or fire is detected, the system sends an alarm message. Their range is about ten kilometres, and they cover a 360-degree view. In order to detect fires as soon as possible, the armed forces have also deployed unmanned aerial vehicles in the areas of Šibenik-Knin, Zadar and Split-Dalmatia Counties.</p> <p>In the various annual reports (lit 3,7,8,9) there are no further cases of fires reported that are caused by forest management, or fires happening because required barriers are missing. There are no cases found in international sources either (65,76,84,86) or in CBD reports (lit 4).</p> <p>All together the annual amount of forests lost to forest fires is in normal years small (5 000 ha, 0,2%), except for 2017 (48 543 ha).</p> <p>The local expert consulted declared that there are no reported cases of fires caused by forest management, or happening because required barriers are missing (source: local expert).</p> <p>The aim of the Croatian government is to prevent <u>any</u> large fire. And fires are not happening because of forest management. To be able to do so large investments were made in recent years. There is no evidence that any forest management will contribute to any further increase of forest fires.</p>		
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	<p>Forests acting as clean drinking water catchments and protection of water quality.</p> <p>Forests provide numerous traditional water supplies to individual houses. Forests that include water catchments are generally smaller and are predominantly in agricultural landscape, mostly in private property.</p> <p>The Law on forest (lit 10) regulates that such areas can become protective forests, both on State and private lands. There is a special procedure in place to discuss and agree such with private owners, including a compensation system. The online mapping system (lit 32) shows the protective forests in the country, it also gives some details why such areas are protective forests. However, for all details the underlying FMPs should be consulted. These are publically available at the local forest offices.</p> <p>Water related issued are further organised through the 'Water management act' (1995 & 2005). This Act regulates the legal status of water and water estate, the methods and conditions of water management (water use, water protection, regulation of watercourses and other water bodies, and protection from adverse effects of water), the method of organizing and performing water management tasks and functions, basic conditions for carrying out of water management activities; powers and duties of Government administration and other Government bodies, local authorities and other legal subjects.</p> <p>There are many other smaller laws and regulations. This includes the Regulation establishing the boundaries of water basins. (1996) and the Regulation on the establishment of water catchment areas (1996). The last source actually list all water catchment areas. Many other laws and regulations handle about water quality, and this is in line with EU regulations.</p> <p>An additional amendment came in 1998/1999 with the 'Regulation amending the Regulation on the establishment of water catchment areas'. This Regulation changes some technical issues, adding new names and concrete borders related to the water catchment areas on the Croatian territory.</p> <p>Such water catchment areas are included in FM planning and there are special management requirements, like the use of biodegradable oils in the forest (enforced since several years). There is also cooperation required with 'Croatian Waters Public company' when forestry works take place.</p> <p>All such sites can be found in the Forest Management Plans and also on the GIS portal (lit 32). Those forests are under special management regimes.</p> <p>In the various annual reports (lit 3,7,8,9) there are no further cases of calamities like no access to clean drinking water catchments or problems with the protection of water quality, nor are there any such cases found in international sources (65,76,84,86) or in CBD reports (lit 4). FSC annual audit reports over the last decade are not indicating any problems either (lit 61, 68).</p> <p>The local expert declared that such threats do not exist or are very low. In addition, forests areas defined as protective for this purpose are quite big. The local expert is not aware of any case that forest management caused some damage or threat to water catchments or water quality (source: local expert).</p>		
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		<p>With regards to the presence of forests acting as clean drinking water catchments and protection of water quality, and if these are potentially threatened by forest management activities, the conclusion is that they are present in the area under assessment, and they are effectively protected from threats caused by management activities. We found no further evidence or data that prove otherwise.</p> <p>Conclusion for indicator 3.4 For forest owners with FMP's there is no danger that forest management creates a risk for erosion control, preventing of flooding, barriers from destructive fire and clean water catchments. A part of the private owners (30%) does not have Forest Management Plans in place. It means that there is a risk that forest management regulations (and limitations) relevant to this indicator are not strictly followed because these are normally listed in the FMP. Here we should take the pre-cautionary approach because there is no strict guarantee that HCVs are not harmed.</p> <p><i>Based on the above 3 sub-assessments we conclude that, for HCV 4, for private forests without FMP there is specified risk. For the rest of the country, the indicator is considered as low risk.</i></p>		
3.5 HCV 5	Lit 10, Local experts and CNRA cat 1 (1.13 & 1.15) and cat 2 (2.3).	<p>Community needs</p> <p><i>Occurrence of HCV</i> This HCV does not appear to occur in the Croatia context. No forest areas were identified that are fundamental to meeting the basic needs of local communities or indigenous people. There are no cases in literature, press or international reports to be found where this is stated differently (see sources below). There are also no special laws or regulations that regulate such things, which is another indication that there are no fundamental problems in meeting such basic needs.</p> <p>Besides this, no sources mention indigenous people (IP) presence in Croatia, neither the sources that give overviews, such as The Indigenous World, nor could any report or website be found mentioning or claiming IP presence or a discussion or debate about such a presence (local expert).</p> <p>According to the 2011 census (lit 93), the most prominent national minority in Croatia are the Serbs (11.5% in 1981, 4.5% in 2001, 4.4% in 2011). There were less than 1% Bosniaks (0.5% in 2001, 0.7% in 2011), and in 2011, Italians (0.42%), Albanians (0.41%), Roma (0.40%), Hungarians (0.33%), Slovenians (0.25%), Czechs (0.22%), and others (Slovaks, Montenegrins, Macedonians, Germans, Ruthenians, Ukrainians, Bulgarians, Turks, Russians, Poles, Jews, etc). These are not considered IP or TP in the country legislation.</p> <p>Thus, all people are equal in Croatia. There are no special laws about different groups of people in relation to forests and Indigenous peoples' rights.</p>	<p><u>Geographical scale:</u> Country</p> <p><u>Functional Scale:</u> Type of forest area - Natural forest - Forest plantation</p> <p>Protection scheme: -Protected areas -Non-protected areas</p>	<p>Low risk</p> <p>The following threshold is met: (23) There is no HCV 5 identified and its occurrence is unlikely in the area under assessment.</p>

		<p>The Forest Act is the only applicable law that says something about people and the use of the forest and it allows all people free access to the state forest, for recreational purposes (Lit 10, Forest Act article 21). It is also permitted to non-owners to collect Non-Timber Forest Products (NTFPs) for trade purposes. But for this a permit is required from the local forest authorities. Individual picking of forest fruits and mushrooms and other NTFPs can be done without a permit when it is not for commercial purposes. Statistics for the collection of NTFPs are not available, but in general NTFP's are harvested by local citizens using it for their own consumption. They are mostly related to mushrooms, aromatics and maybe nuts. Picking NTFPs is not considered fundamental for basic needs in Croatia (source: local expert).</p> <p><i>Identification and assessment of threats and safeguards</i> No forest areas are identified officially that are fundamental to meeting the basic needs of local communities or indigenous people (lit 10, local expert). An identification of threats is therefore not applicable.</p> <p><i>Conclusion</i> This HCV does not appear to occur in the Croatia context. No forest areas were identified that are fundamental to meeting the basic needs of local communities or indigenous people.</p> <p><i>See also the CNRA cat 1 (indicators 1.13 & 1.15) and cat 2 (indicator 2.3) assessment (see above) where risks are also identified as low. Indicator 1.13 addresses the Customary rights and there is some overlap with this indicator. Indicator 1.15 explains the situation with Indigenous peoples rights (which are N/A in Croatia) and indicator 2.3 The rights of Indigenous and Traditional Peoples.</i></p> <p><i>For HCV 5, all of Croatia is considered Low Risk.</i></p>		
3.6 HCV 6	Lit 37,42,43	<p>Cultural values and Cultural Heritage Sites.</p> <p><i>Occurrence of HCV</i> HCV 6 is present in the area under assessment and all significant cultural features created intentionally by humans are identified. Examples of cultural sites found in forests (such as archaeological sites, monuments, etc.) are rarely considered critical to local community's traditional cultural identity. But nevertheless, these sites are important (see sources below).</p> <p>The 'Web search engine for cultural goods of the Republic of Croatia', or the Register of Cultural Heritage (lit 42,43), is an official collection of data on immovable cultural heritage in the territory of the Republic of Croatia. Archaeological sites are included. The Register is managed by the Ministry of Culture. There are 6 5277 sites listed and there is a search option (in Croatian only) behind where you can look for name, type etc. In principle only the sites located in forested areas are applicable to the CNRA assessment. Such can be found when looking, for example, under Culturel landscape (which leads to 14 sites). The regular search for public consultation would be by place (city, municipality etc) or name (name of forest, park etc). This quickly result in a list of located cultural heritage sites in the searched area.</p>	<p><u>Geographical scale:</u> Country</p> <p><u>Functional Scale:</u> Type of forest area - Natural forest - Forest plantation</p> <p>Protection scheme: -Protected areas</p>	<p>Low risk</p> <p>The following threshold is met: (29) HCV 6 is identified and/or its occurrence is likely in the area under assessment, but it is effectively protected from threats caused by management activities.</p>

	<p>There is also the Croatian Conservation Institute. The main activities of the Institute include researching, documenting, valorising, interpreting, designing, planning as well as supervising and conducting work on the material structure by conserving and/or restoring archaeological, immovable and movable cultural goods of the Republic of Croatia. All such sites are also located in the same register as mentioned above but the active projects (where research of restorations taking place) could also be found on their website.</p> <p>Cultural heritage is identified (lit 42,43) and included in FMP's when required. But even when there is no FMP such sites are identified and strictly protected. Limitations or restricted management is prescribed for these sites in all cases. Management on these sites is subject to authorisation of the Ministry of Culture. The Ministry of Culture sets the protection measures and limitations to Cultural Heritage areas, buildings, etc. So if any of this is inside the forest areas the forest manager is informed about the special limitations or conditions of preservation or conservation. Those areas are noted in the FMPs and management is adjusted to special conditions. There is no data on existing threats of forest management to cultural heritage (source: local expert).</p> <p><i>Identification and assessment of threats and safeguards</i></p> <p>In Croatia the Croatian Commission for UNESCO (Ministry of Culture) is responsible for all UNESCO matters. As can be seen in the overview text there are 4 UNESCO sites related to forests (these sites are also in the Register of Cultural Heritage). None of these are at the UNESCO 'danger' list of 'World Heritage sites in Danger'. Croatia itself did not report any major problems with protection in their official 'cycle 1 or 2' report to UNESCO (lit 37).</p> <p>There are no other cases in literature, press or international reports (source; Google search) to be found where cultural values or heritage sites in general seems to be threatened by forest management. There are also no economic incentives that would lead to, and no well-known cases of, forest managers causing damage or disturbing sites or features of national cultural significance (source: local expert).</p> <p><i>Conclusion</i> For HCV 6, all of Croatia is considered Low Risk.</p>	-Non-protected areas	
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Recommended control measures

The recommended control measures here are only indicative in nature, and are not mandatory. Recommended control measures might not have been provided for all the risks that have been identified in this risk assessment. Organizations shall evaluate and devise appropriate control measures to mitigate the risks identified in this risk assessment as applicable.

Indicator	Recommended control measures
3.0	N/A
3.1 HCV 1	<p>A part of the private owners (30%) does not have Forest Management Plans in place. Here we should take the pre-cautionary approach because there is no strict guarantee that HCV's are not harmed.</p> <p>When buying from private forests: Ask for valid FMP + annual operating plan. If these are not available there are two solutions:</p>

	<p>a) Do not buy from these private forests.</p> <p>b) Request the harvesting permit. And request an independent environmental impact assessment from the owner. This is not required by law (only in Natura2000 sites such should be available anyway) but gives you a complete picture of the risks. Such an assessment should take into account all 6 HCV categories. If this document shows that there are no risks to HCV you can buy from this forests. Store this document in your files.</p>
3.2 HCV 2	See indicator 3.1
3.3 HCV 3	See indicator 3.1
3.4 HCV 4	See indicator 3.1
3.5 HCV 5	N/A
3.6 HCV 6	N/A

Information sources

No	Type	Source of information	Relevant HCV category
1	FMP	Forest Management Plan of the Republic of Croatia valid for the period 1.1.2016-31.12.2025, Ministry of Agriculture, , 2017 https://poljoprivreda.gov.hr/istaknute-teme/sume-112/sumarstvo/sumskogospodarska-osnova-2016-2025/250	All
2	History	State Enterprise Croatian Forests. History of forests. Hrvatske šume website. 2019 https://www.hrsume.hr	All
3	Stats	Statistical Yearbook of the Republic of Croatia 2018, Croatian Bureau of Statistics, 2019. https://www.dzs.hr/Hrv_Eng/ljetopis/2018/sljh2018.pdf	All
4	CBD	<p>Convention on Biological Diversity, CBD, 2014 https://www.cbd.int/information/parties.shtml</p> <p>Convention on Biological Diversity, Country profile, CBD, 2019 https://www.cbd.int/countries/default.shtml?country=hr</p> <p>National website http://www.bioportal.hr/</p> <p>Direct link to 5th National report https://www.cbd.int/doc/world/hr/hr-nr-05-en.pdf</p> <p>Direct link to National Biodiversity Strategy and action plan https://www.cbd.int/doc/world/hr/hr-nbsap-v3-en.pdf</p>	1 and 3

5	Biodiv.	Biodiversity of Croatia, State Institute For Nature Protection Ministry Of Culture, Republic Of Croatia, 2006 https://www.vusz.hr/Cms_Data/Contents/VSZ/Folders/dokumenti/javanustanovazaupravljanjezasticenimprirodnimvrijednostima/arhiva/~contents/E7X2RXYGCTUYPPPN/2011-3-21-58011335-biodiversityofcroatia.pdf	1 and 3
6	Ecosys	Natural Scientific Identification And Classification Of Forest Ecosystem Of Croatian Karst Areas, J. Martinovic, A. Vrankovic, A. Kutle, Agronomski Glasnik 4-5/2010,. 2010 https://hrcak.srce.hr/index.php?show=clanak&id_clanak_jezik=101637	3
7	Web	Official website of the Ministry of Agriculture, Ministry of Agriculture, 2019 https://poljoprivreda.gov.hr/o-ministarstvu/9_2019 <i>Annual reports</i> https://poljoprivreda.gov.hr/istaknute-teme/poljoprivreda-173/poljoprivredna-politika/agroekonomske-analize/zeleno-izvjesce/189	All
8	Web	Official website of Hrvatske šume, Hrvatske šume, 2019 https://www.hrsume.hr <i>Annual reports:</i> https://www.hrsume.hr/index.php/en/annual-statements	All
9	Web	Official website of Croatian Agricultural and Forestry Advisory Service , Croatian Agricultural and Forestry Advisory Service, 2019 www.savjetodavna.hr <i>Annual reports</i> https://www.savjetodavna.hr/product/godisnje-izvjesce-za-2017-i-plan-rada-za-2018/	All
10	Law	Forest Law, Official Gazzette 68/2018, 115/18 (Zakon o šumama, 2018, NN 68/2018, 115/18) 2018 https://narodne-novine.nn.hr/clanci/sluzbeni/2018_07_68_1392.html	1 and 3
11	Law	Law on Croatian Agricultural And Forestry Advisory Service, 2018, Official Gazzette 15/2018 (Zakon o Hrvatskoj poljoprivredno-šumarskoj savjetodavnoj službi, NN15/2018). 2018 https://narodne-novine.nn.hr/clanci/sluzbeni/2018_02_15_312.html	1 and 3
12	Law	Law on Termination of the Law on the Croatian Agricultural and Forestry Advisory Service, Official gazzete 111/2018 (Zakon o prestanku važenja Zakona o Hrvatskoj poljoprivredno-šumarskoj savjetodavnoj službi, 2018, NN111/2018). 2018 https://narodne-novine.nn.hr/clanci/sluzbeni/2018_12_111_2144.html	1 and 3
13	Web	Official website of Croatian Forest Research Institute, Croatian Forest Research Institute, 2019 http://www.sumins.hr/	All
14	Web	Official website of Faculty of Forestry, Faculty of Forestry, 2019 http://www.sumfak.unizg.hr	All
15	Web	Official website of the Ministry for Environmental Protection and Energy (MEPE), Now the Ministry of Environment and Energy, 2019 https://mzoe.gov.hr/default.aspx <i>Annual reports:</i> https://mzoe.gov.hr/pristup-informacijama/strategije-planovi-i-ostali-dokumenti/godisnje-izvjesce-o-radu-ministarstva/1072	All

16	Stats	Protected areas, , Ministry of Environment and Energy, 2019 https://mzoe.gov.hr/rezultati-pretrazivanja/49?pojam=protected+area	1 and 3
17	Web	Website of the Croatian Agency for Environment and Nature (HAOP), now part of MEPE, 2019 http://www.haop.hr Annual reports: http://www.haop.hr/hr/godisnja-izvjesca-o-pracenju-emisija-oneciscujucih-tvari-u-zrak-iz-nepokretnih-izvora-na-teritoriju	All
18	Stats	The Forests of Croatia – Country Report, Matic, S. in Dijaci, J.(eds.) Virgin Forests and Forest Reserves in Central and East European Countries - proceedings of the invited lecturers' reports presented at the COST E4 Management Committee and Working Groups. 1999 http://www.natura2000.gov.si/uploads/tx_library/Diaci_Virgin_forests_and_forest_reserves_Cost_E4_.pdf	All
19	Law	Law on Environmental protection , 2013, Official Gazette 80/2013 (Zakon o zaštiti prirode, 2013, NN 80/2013) – amendments lit 20, 21 https://narodne-novine.nn.hr/clanci/sluzbeni/2013_06_80_1658.html	All
20	Law	Law on Amendments to the Law on environmental protection , 2018 Official Gazette 15/2018 (Zakon o izmjenama I promenama Zakona o zaštiti prirode, 2018, NN 15/2018) https://narodne-novine.nn.hr/clanci/sluzbeni/2018_02_15_316.html	All
21	Law	Law on Amendments to the Law on environmental protection , 2019, Official Gazette 14/2019 (Zakon o izmjenama Zakona o zaštiti prirode, 2019, NN 14/2019) https://narodne-novine.nn.hr/clanci/sluzbeni/2019_02_14_276.html	All
22	site	National Park Northern Velebit (Nacionalni Park Sjeverni Velebit), National Park authorities, 2019 http://www.np-sjeverni-velebit.hr/park/ https://www.parkovihrvatske.hr/nacionalni-park-sjeverni-velebit	1 and 3
23	site	Plitvice Lakes National Park (Nacionalni Park Plitvička jezera), National Park authorities, 2019 https://np-plitvicka-jezera.hr/en/about-the-park/general-information/	1 and 3
24	site	Public agency Priroda (Javna ustanova za upravljanje zaštićenim područjima Priroda, National Park authorities, 2019 http://ju-priroda.hr/zasticena-podrucja-pgz/ 2019	1 and 3
25	site	Paklenica National Park (Nacionalni park Paklenica) , National Park authorities, 2019 https://np-paklenica.hr/en/index.php/park/about-park https://np-paklenica.hr/en/index.php/park/park-authority	1 and 3
26	site	Risnjak National Park (Nacionalni park Risnjak) , National Park authorities, 2019 http://np-risnjak.hr/en/general-infomations/ http://np-risnjak.hr/en/dokumenti-3/administration/	1 and 3
27	site	Mljet National Park (Nacionalni park Mljet) , National Park authorities, 2019 http://np-mljet.hr/en/about-the-park/	1 and 3
28	site	Kornati National Park (Nacionalni park Kornati) , National Park authorities, 2019 https://en.wikipedia.org/wiki/Kornati http://www.np-kornati.hr/en/	1 and 3
29	site	Brijuni National Park (Nacionalni park Brijuni) , National Park authorities, 2019 http://www.np-brijuni.hr/en/	1 and 3
30	site	Krka National Park (Nacionalni park Krka) , National Park authorities, 2019 http://www.np-krka.hr/	1 and 3

31	site	Northern Velebit National Park (Nacionalni park Sjeverni Velebit) , National Park authorities, 2019 http://www.np-sjeverni-velebit.hr/	1 and 3
32	Maps	Biportal Nature Information System, Croatian Agency for Environment and Nature, 2019 http://www.biportal.hr/gis/?lang=en&theme=neptune Geoportal information system (CF-ltd), Hrvatske šume, 2019 http://geoportal.nipp.hr/	All
33	site	UNESCO Biosphere reserve Velebit, UNESCO, 2019 http://www.unesco.org/new/en/natural-sciences/environment/ecological-sciences/biosphere-reserves/europe-north-america/croatia/velebit-mountain/	1 and 3
34	site	UNESCO Biosphere reserve Mura - Drava – Dunav, UNESCO, 2019 http://www.unesco.org/new/en/natural-sciences/environment/ecological-sciences/biosphere-reserves/europe-north-america/croatiahunary/mura-drava-danube/	1 and 3
35	site	UNESCO Heritage Plitvice Lake National Park, UNESCO, 2019 http://whc.unesco.org/en/list/98	1,2,3
36	site	UNESCO Papuk Global Geopark, UNESCO, 2019 http://www.unesco.org/new/en/natural-sciences/environment/earth-sciences/unesco-global-geoparks/list-of-unesco-global-geoparks/croatia/papuk/	1,2,3
37	Stats	UNESCO, State of conservation of properties inscribed on the World Heritage List, UNESCO, 2019 https://whc.unesco.org/archive/2018/whc18-42com-7B-en.pdf 2018 Cycle 1 report: http://whc.unesco.org/en/periodicreporting/	1,2,3
38	Natura 2000	Natura 20000 Barometer, European Environmental Agency, 2018, https://www.eea.europa.eu/data-and-maps/dashboards/natura-2000-barometer 2019 Croatia did not yet report anything under Natura2000 Natura 2000, EU website with maps and data of all sites, 2019 http://ec.europa.eu/environment/nature/natura2000/data/index_en.htm EU Habitats Directive, country reporting, Article 17 report to the EU (2007-2013) https://bd.eionet.europa.eu/activities/Reporting/Article_17/Reports_2013 EU Birds Directive, country reporting, Article 12 report to the EU (2008-2012) http://ec.europa.eu/environment/nature/knowledge/rep_birds/index_en.htm New action plans towards 2019: http://europa.eu/rapid/press-release_IP-17-1112_en.htm	1,2,3

39	Law	Regulation on Ecological Network, Official Gazette 124/2013 (Uredba o ekološkoj mreži, 2013, NN 124/2013) https://narodne-novine.nn.hr/clanci/sluzbeni/2013_10_124_2664.html	All
40	Law	Amendments to Regulation on Ecological Network, 2015, Official Gazette 105/2015 (Uredba o izmjenama Uredbe o ekološkoj mreži, NN 105/2015) https://narodne-novine.nn.hr/clanci/sluzbeni/2015_10_105_2052.html	All
41	Guide	Rulebook of forest management. Pravilnik o uređivanju šuma, NN 79/2015, 91/2018, 2018 https://narodne-novine.nn.hr/clanci/sluzbeni/2018_11_97_1875.html https://narodne-novine.nn.hr/clanci/sluzbeni/2015_07_79_1532.html	All
42	Stats	Web search engine for cultural goods of the Republic of Croatia, Ministry of Culture, 2019 https://www.min-kulture.hr/default.aspx?id=6212	4,5,6
43	Law	About the form, content and method of registering the cultural goods of the Republic Of Croatia, Official Gazette 89/2011, 130/2013 (Pravilnik o obliku, sadržaju i načinu vođenja registra kulturnih dobara Republike Hrvatske NN 89/2011, 130/2013) https://narodne-novine.nn.hr/clanci/sluzbeni/2011_07_89_1905.html https://narodne-novine.nn.hr/clanci/sluzbeni/2013_10_130_2838.html	4,5,6
44	Law	Forestry laws and regulations; a summary, Ministry of Agriculture, 2018 https://poljoprivreda.gov.hr/pristup-informacijama/zakoni-i-propisi/sumarstvo-297/297	All
45	Signat.	Regulations and international treaties. Ministry of Environment and Energy, 2019 https://mzoe.gov.hr/regulations-and-international-treaties-ratified-or-signed-by-the-republic-of-croatia/environmental-protection/1429	All
46	Strateg	Strategy and Action Plan for the Protection of Biological and Landscape Diversity of the Republic of Croatia, 2008, Official Gazette 143/08 (Strategija i akcijski plan zaštite biološke i krajobrazne raznolikosti Republike Hrvatske, NN 143/2008) https://narodne-novine.nn.hr/clanci/sluzbeni/2008_12_143_3962.html 2	2
47	Strateg	The Strategy and Action Plan for Nature Protection of the Republic of Croatia for the period 2017-2025, Official Gazette 72/2017 Strategija i akcijski plan zaštite prirode Republike Hrvatske za razdoblje od. do 2025. godine, NN72/2017 https://narodne-novine.nn.hr/clanci/sluzbeni/2017_07_72_1712.html	All
48	CBD	Convention on Biological Diversity – Croatia, CBD, 2019 https://www.cbd.int/countries/default.shtml?country=hr	1 and 3
50	Biodiv	World Database of Key Biodiversity Areas, Bird Life International, 2019 http://www.keybiodiversityareas.org/site/results?reg=0&cty=52&snm=	1 and 3
51	Red list	Valid Red Lists in the Republic of Croatia,) , Croatian Agency for Environment and Nature (HAOP) 2017 http://www.haop.hr/hr/tematska-podrucja/prirodne-vrijednosti-stanje-i-ocuvanje/ugrozenost-vrsta-i-stanista/crveni-1	1 and 3
52	Law	Ordinance on the Marking of Trees, Marking of Wood Assortments, Compensations and Forestry Order, Official Gazette 17/2015, 57/2015 (Pravilnik o doznaci stabala, obilježavanju drvnih sortimenata, popratnici i šumskom redu NN 17/2015, 57/2015) https://narodne-novine.nn.hr/clanci/sluzbeni/2015_02_17_332.html https://narodne-novine.nn.hr/clanci/sluzbeni/2017_06_57_1270.html	All
53	Stats	Registry of private forest owners , Ministry of Agriculture, 2019 https://poljoprivreda.gov.hr/istaknute-teme/sume-112/sume-privatnih-sumoposjednika/upisnik-sumoposjednika-1351/1351	All
54	Law	Ordinance on registration of forest owners, Official Gazette NN137/2014 (Pravilnik o upisniku šumoposjednika, 2014, NN 137/2014)	All

		https://narodne-novine.nn.hr/clanci/sluzbeni/2014_11_137_2605.html	
55	Web	With HRK 2.1 billion, the share of Croatian Forests d.o.o. in total forestry revenue is 78%). Fina, 2018. https://www.fina.hr/-/s-2-1-milijardi-kuna-udio-hrvatskih-suma-d-o-o-u-ukupnim-prihodima-sumarstva-je-78-	All
56	Web	Website, Financial Agency -Fina (Financijska agencija – Fina), 2019 https://www.fina.hr/tko-smo	All
57	Law	Ordinance on the collection of native wild species, Official Gazette 114/2017 (Pravilnik o sakupljanju zavičajnih divljih vrsta, NN 114/2017) https://narodne-novine.nn.hr/clanci/sluzbeni/2017_11_114_2663.html	5
58	Law	Professional foundation for collecting native wild species 2nd amended version, HAOP (Stručna podloga za sakupljanje zavičajnih divljih vrsta - 2., izmijenjena i dopunjena verzija, 2018, HAOP https://www.mzoe.hr/doc/strucna_podloga_za_sakupljanje_zavicajnih_divljih_vrsta_2_izmijenjena_i_dopunjena_verzija.pdf	5
59	Law	Republic of Croatia - illegal logging and trade of illegally-derived forest products http://www.unece.org/fileadmin/DAM/timber/docs/sem/2004-1/full_reports/Croatia.pdf	All
60	Law	Ordinance on fire protection, Official Gazette 33/2014 Pravilnik o zaštiti šuma od požara, 2014, NN 33/2014 https://narodne-novine.nn.hr/clanci/sluzbeni/2014_03_33_599.html	4
61	FSC	Hrvatske šume FSC certificate landing page at website of the company, Hrvatske šume, 2019 https://www.hrsume.hr/index.php/hr/ume/certsuma	All
62	PEFC	PEFC certification in Croatia, PEFC, 2019. List of certificates in Croatia. http://pefc.sumins.hr/o-projektu/ https://www.pefc.org/projects/forest/balkan-region	All
63	Biodiv	Primeval forests and forest reserves in Croatia, Ministry of Agriculture, 2018 https://arhiva.savjetodavna.hr/vijesti/46/5405/prasume-i-sumski-rezervati-u-hrvatskoj/	1 and 3
64	Biodiv	Primeval forests and their significance for forest management, Antić, I., Plant protection Journal 27/6 (Prašume i njihovo značenje za gospodarenje šumama u Hrvatskoj, Antić, I. Glasnik zaštite bilja 27/6), 2004 https://hrcak.srce.hr/164399	1 and 3
65	FAO	Global forest resources assessment 2015 country report Croatia. FAO. 2015. http://www.fao.org/3/a-az193e.pdf	All
66	Map	Register of protected areas and interactive map of Natura 2000, Croatian Agency for Environment and Nature, 2019 http://www.haop.hr/hr/baze-i-portali/ekoloska-mreza-natura-2000 http://www.bioportal.hr/gis/?lang=en&theme=neptune	All
67	Ecosys	Handbook for definition of land habitats in Croatia according to EU Habitat Directive, J., Topić & Vuketić, J., 2009 (http://www.haop.hr/sites/default/files/uploads/publications/2018-01/Topic%20-%20Vukelic%20-%20Prirucnik%20za%20kopnena%20stanista.pdf	3
68	FSC	Group Scheme for FSC forest certification: HCVF (High Conservation Value Forests). Material given by main FSC Coordinator of Hrvatske šume, 2019 General FSC website and audit reports: https://fsc.org/en .	All
69	FSC	Development version of Croatian generic standards and control rules, Soil asassociation woodmark, 2001 http://portal.hrsume.hr/images/dok/consult/gen%20standard%20hrv.pdf http://www.fao.org/forestry/climatechange/53459/en/	All

		http://www.wno.org/forest-climate https://us.fsc.org/mission-and-vision.187.htm	
70	Law	Act on forest reproductive material, 2009, Amended in 2011, 2013 and 2014. (Zakon o šumskom reprodukcijском materijalu - OG 75/09, 61/11, 56/13 i 14/14) https://poljoprivreda.gov.hr/pristup-informacijama/zakoni-i-propisi/sumarstvo-297/297	All
71	Guide	Rulebook on shape, content and way of administrating of forest seed productive objects, 2011, (Pravilnik o obliku, sadržaju i načinu vođenja registra šumskih sjemenskih objekata)(OG 4/11) https://poljoprivreda.gov.hr/pristup-informacijama/zakoni-i-propisi/sumarstvo-297/297	All
72	Guide	Rulebook on development and content of Management programs for seed productive forest objects in category "Qualified" and "Tested", 2011, (Pravilnik o načinu izrade i sadržaju Programa gospodarenja šumskim sjemenskim objektom u kategoriji "kvalificiran" ili "testiran") (OG 4/11) https://poljoprivreda.gov.hr/pristup-informacijama/zakoni-i-propisi/sumarstvo-297/297	All
73	Red list	Red book of vascular flora of croatia, Categories EX, RE, CR, EN and VU, Nikolić, T., Topić, J. ur. ,2005 . www.haop.hr/hr/publikacije/crvena-knjiga-vaskularne-flore-hrvatske	1 and 3
74	Guide	Rulebook on strictly protected species, OG 144/13, 73/16. https://narodne-novine.nn.hr/clanci/sluzbeni/2013_12_144_3086.html	1 and 3
75	Stats	Ramsar, Ramsar sites, 2019 http://www.ramsar.org/wetland/croatia	1 and 3
76	News	Chatham House Illegal Logging Indicators Country Report Card, Chatham House, 2019 http://www.illegal-logging.info/regions/croatia (no news about Croatia)	All
77	Ecosys	Intact Natural Forest Landscapes, Greenpeace , 2019 http://www.intactforests.org/world.map.html	2
78	Red list	IUCN Red List, Country info, IUCN, 2019 http://www.iucnredlist.org/about/summary-statistics#Tables_5_6	3
79	Ecosys	General Atlas of Forest and Landscape Restoration, World Resource Inst., 2019 http://www.wri.org/resources/maps/atlas-forest-and-landscape-restoration-opportunities	2
80	Guide	Website, HCV network, 2019 https://www.hcvnetwork.org/resources/global-hcv-toolkits	All
81	Guide	The use of the 'Common guidance for the identification of High Conservation Values' for the assessment of HCV presence is recommended. Also use this for interpretation of 'Significant values', High Conservation network, 2019. https://www.hcvnetwork.org/resources/folder.2006-09-29.6584228415/2013_commonguidancev5	All
82	Guide	HCV Toolkit, Proforest,2003 http://www.proforest.net/en/publications/high-conservation-value-forest-toolkit	All
83	Ecosys	Country profile (NA), Intact Forest Landscapes, 2019 http://www.intactforests.org/data.ifl.html Online map with losses and gain: http://www.globalforestwatch.org/map/7/5.98/99.69/ALL/grayscale/loss,forestgain/607?tab=basemaps-tab&begin=2001-01-01&end=2017-01-01&threshold=30&dont_analyze=true and	2

Controlled wood category 4: Wood from forests being converted to plantations or non-forest use

Risk assessment

Indicator	Source of information	Functional scale	Risk designation and determination
4.1	<p>Legislation</p> <p>Croatia's Constitution of 1991 with Amendments through 2014. Specific article 3 and 52. https://www.constituteproject.org/constitution/Croatia_2010.pdf?lang=en</p> <p>Forest law 2019 Zakon o šumama (OG 140/05, 82/06, 129/08, 80/10, 124/10, 25/12, 68/12, 148/13, 94/14, 68/18, 14/19) Specific article 2,3 and 9. https://narodne-novine.nn.hr/clanci/sluzbeni/2018_07_68_1392.html</p> <p>Law on Environmental protection 2018 Zakon o zaštiti prirode (OG 80/13, OG 15/18, 14/19) Zakon o zaštiti prirode Specific article 4. https://www.zakon.hr/z/403/Zakon-o-za%C5%A1titi-prirode</p> <p>Directive on process and measures for establishment of easement rights on forests and forest land in state ownership for purposes of exploitation of minerals, 2007 Uredba o postupku i mjerilima za osnivanje prava služnosti na šumi i/ili šumskom zemljištu u vlasništvu Republike Hrvatske u svrhu eksploatacije mineralnih sirovina (OG 13/07, Amended in 2011(OG 9/11) () https://narodne-novine.nn.hr/clanci/sluzbeni/2007_12_133_3780.html</p> <p>Directive on establishment of development rights on forests and forests land in state ownership, 2016 Uredba o osnivanju prava građenja na šumama i šumskom zemljištu u vlasništvu Republike Hrvatske (OG 61/2016) () https://narodne-novine.nn.hr/clanci/sluzbeni/2016_07_61_1526.html</p>	Country	<p>Assessment based on legality</p> <p>Content of the law</p> <p>Forests and woodlands are of specific interest to the Republic of Croatia and as such are under national protection by: The Constitution (Art. 3, 52), the Law on forest (Art. 2); and the Law on Environmental protection.</p> <p>The Law on forest prescribes procedures for forest conversion (temporary or permanent) and requires paid compensation due to the loss of environmental function of forest (Art. 61). The exact fee consists of various parts (forest fee, a forest land fee and a fee for the reduction of general forest functions) and the calculation method is explained in article 62 of the Forest law. No other compensation besides financial is possible (no land exchange or similar). Any conversion which is not prescribed by Law on forest is illegal. If it is allowed under special conditions a specific plan needs to be developed and if such a plan is not implemented within 2 years forests need to be replanted within 1 year.</p> <p>The conversion of forests can only be done for development purposes which are of national importance, see below. There are 3 exceptions possible:</p> <ol style="list-style-type: none"> 1. An exception is when a forest is declared as a special purpose forest with the function of forests for golf and camping. Such cases are arranged by the 'Directive on establishment of development rights on forests and forests land in state ownership, 2016' and the 'Action plan of development of Golf tourism in Croatia'. And such can only take place in State forests. <p>In such a case the development rights can be assigned to a private person or a company for golf or camping site development which can lead to conversion of a small part of natural forests to non-forest purposes, in this case constructing. Limitations to construction are given</p>

<p>Action plan of development of golf tourism in Croatia, 2018, Akcijski plan razvoja golf ponude , https://mint.gov.hr/UserDocsImages/AA_2018_c-dokumenti/180125_akcijski_golf.pdf</p> <p>Law on the Organization and Scope of Ministries and Other Central Bodies of Public Administration 2016 Zakon o ustrojstvu i djelokrugu ministarstava i drugih središnjih tijela državne uprave (OG 93/16, 104/16) https://www.mingo.hr/page/kategorija/rudarstvo https://www.zakon.hr/z/410/Zakon-o-ustrojstvu-i-djelokrugu-ministarstava-i-drugih-sredi%C5%A1njih-tijela-dr%C5%BEavne-uprave</p> <p>Act on mining 2013 Zakon o rudarstvu (OG 56/13) https://www.mingo.hr/page/kategorija/rudarstvo https://www.zakon.hr/z/390/Zakon-o-rudarstvu</p> <p>Forest management plan of the republic of Croatia (FMAP) valid for the period 1.1.2016-31.12.2025. 2017 Šumskogospodarska Osnova Šumskogospodarskog područja Republike Hrvatske–vrijedi od 1.1.2016. do 31.12. 2025. Godine. https://poljoprivreda.gov.hr/istaknute-teme/sume-112/sumarstvo/sumskogospodarska-osnova-2016-2025/250</p> <p>Other sources of information Web page of Ministry of Environment Protection and Energy comprise all data on nature, environment, pollution, land use. https://mzoe.gov.hr/ and www.bioportal.hr and webpage of Croatian Agency for Environment and Nature which is part of Ministry of Environment Protection and Energy. www.haop.hr</p> <p>National reports on Land use and Land use change, 2019 UNFCC https://unfccc.int/documents/194759</p> <p>Corruption Perceptions Index (CPI), 2018, Transparency International https://www.transparency.org/cpi2019</p>		<p>in a sense that only 4% of all designated areas for golf & campground can be assigned for construction. The construction rights which the user can get are set at maximum 99 years. All golf areas need to be defined by general spatial development plans made by the local county and municipality and such forests should be within the borders of the designated areas appointed by the Ministry of Agriculture. The same ministry should also issue the final permit. During the permit process they also ask Hrvatske šume (HS)(Croatian forests Ltd) (which manages all state owned forests) for their opinion on management of those forests and if something special (HCVs) are in place that need to be protected. If the plan for development of the Golf or campground is accepted, those forests will get a new Forest Management Plan with all nature protection conditions incorporated and forests will remain state owned, only the use rights will be given to investors.</p> <p>At this moment in Croatia there are 6 Golf courses and there is an action plan for the development of 98 new Golf courses, with different sizes (from 20 to 200 ha). All of them will need to pass through the procedure as explained above. And for all of them investors need to be found, which proofs to be very difficult and at the moment it doesn't seem realistic that all of them will ever be build (source; local expert, 2019).</p> <p>Existing golf areas are: GC Zagreb (27 holes); GC Adriatic, Savudrija (18); GC NP Brijuni (18); GC Dolina Kardinala, Krašić (18); GC St Martin (9); Krasica, Bakar (9).</p> <p>Also, there are four Golf centres: Split, Stobreč (6); GC Zmajevac, Kneževi vinogradi (6); GC Ban Jelačić, Zaprešić (3); GC Principovac, Ilok (3) and some practicing grounds: Umag, Tar, Poreč, Rovinj, Pula, Medulin and Samobor.</p> <p>At this moment there are 1 429 ha converted to golf courses.</p> <p>Campgrounds are also build, but on a neglectable scale and these are 'nature' campgrounds, the forest remains.</p> <p>2. Conversion of natural forests to plantations or non-forest use is also possible based on established easement rights for minerals exploitation (infrastructure needed for mineral exploitation). After the mining intervention plantations should be established. Rules are the</p>
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<p>Worldwide Governance Indicators - the WGIs report aggregate and individual governance, 2019, World Bank http://info.worldbank.org/governance/wgi/index.aspx#home http://info.worldbank.org/governance/wgi/index.aspx#reports Statistical Yearbook of the Republic of Croatia 2018, Croatian Bureau of Statistics. https://www.dzs.hr/Hrv_Eng/ljetopis/2018/sljh2018.pdf</p> <p>Global forest resources assessment 2015 country report Croatia. FAO. http://www.fao.org/3/a-az193e.pdf</p> <p>Country profile 2019, Global Forest Watch https://www.globalforestwatch.org/dashboards/country/HRV</p> <p>The Forests of Croatia – Country Report, 1999, Matic, S. in Dijaci, J.(eds.) http://www.natura2000.gov.si/uploads/tx_library/Diaci_Virgin_forests_and_forest_reserves_Cost_E4_.pdf</p> <p>Local expert: Dijana Vuletić, Croatian Forest Research Institute</p>		<p>same for state and private forest owners but if a private owner refuses mining activity it will not happen on his lands. If the owner agrees he will be compensated.</p> <p>Those rights can be given for 10 years with possibility of prolongation. The maximum area is 20 ha and it should be reforested after exploitation. The overall land use remains forests, it is thus seen as a temporarily shift in purpose. The use of mineral raw material is under the Ministry of Economy, Entrepreneurship and Crafts and regulated by the Act on mining. Croatian forests Ltd have a daughter company for mineral exploitation “Quarry Krašić Ltd” which manages, for example, a mine area of 12,5 ha (open pit, stone, gravel). At the moment (2019) there are 27 of such mines, with in total 73 ha of forest converted (source: local expert).</p> <p>Before any minerals exploitation can start an Environmental Impact Assessment is needed. The procedure is not simple and several ministries are involved, as well as Hrvatske šume. The process is regulated by the Law on mining (OG 52/18). The law also states that there are areas dedicated as possible mining areas. Based on that the local administration, with coordination from the Ministry of Economy, publish a public call for investigating the mining possibilities or exploitation. But at least 30 days before this call, it needs to consult National and local administrations, public bodies responsible for some resources (as HS or Croatian waters) on existing special conditions for exploitation. Those conditions should be incorporated into the public call. The Ministry of Environment Protection and Energy and other relevant Ministries as well as local authorities will be consulted before publishing the call and all limitations and conditions will be incorporated into the call. Such is all needed for the environment impact assessment. On all steps during the issuing of a permit for exploitation, the Ministry of Environment Protection and Energy needs to be informed. In addition, if the exploitation field is in the water protection areas, the Water administration and public bodies need to be additionally consulted and involved in the whole process (source: local expert).</p> <p>3. Forest converted to settlements. These are considered ‘national importance’. And thus conversion is possible. Those cases are</p>
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			<p>happening when a local administration needs space for expansion of the city. Such is arranged in the Forests law (OG 52/18) Article 51 (1) a, b, c. The Ministry of Agriculture, responsible for forestry, is responsible in coordination with local authorities. In such a case a strategic document is needed and such requires coordination of several ministries. Conversion cannot happen if such a forest is protected or declared for special purposes. There cannot be any other restrictions on the land either (because of nature or environment protection). For data and figures see below (source: local expert).</p> <p>There is no conversion of present forests to agricultural lands possible (Forest law); it is only possible to use forest land for establishing olive tree orchards or plantation of short rotation species. Such is considered as not permanent and can be approved only for degraded forests and forests land which is not overgrown with high forests.</p> <p>However, the Forest law (OG 52/18) Article 52 (1 -8) defines situations when the forests land is in the cadastre actually defined as, 'some type of agricultural land' (meadow, olive orchard, vineyard etc.). These are thus 'forest lands' that were cleared of trees, this was mostly happening during and shortly after the war. Such lands were cleared of trees and used as agricultural lands for a long time now.</p> <p>Such lands can be excluded from General Forest Management Plan (GFMP) and be used as agricultural land, the process is led by Ministry of Agriculture. When the area is excluded from the GFMP it should be used for agriculture and it should start no later than 2 years after the decision. If there is private land the process is the same but then the private owner initiates the process.</p> <p>The opposite process is also possible. This is the case when forest overgrows agricultural land, and such can happen on low quality or abandoned agricultural land. Such lands can often be found far away in the backcountry near empty villages. Either the landowner can declare them as forest lands, or, in many cases after the war, the owners could not be found. Then the lands fall back to the state and will be declared as forest land.</p> <p>Protected areas, protective forests as well as forest of special purposes are excluded from any conversion. Conversion can only take place in production</p>
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		<p>forest areas. Under the category 3 of this CNRA it is explained that all HCV's are protected under protective forests and special purpose forest. In general, 'productive' forests are of low value (from an environmental point of view) and the presence of HCV's in such areas is unlikely.</p> <p>Land use and land use change data are part of the obligation to UN FCC reporting and can be found on the corresponding report "National reports on Land use and Land use change". See below for the data.</p> <p>Regulations based on the Ecological network</p> <p>There are also some additional measures set in the various regulations about the Ecological network (Natura 2000). See indicator 1.9 for more information and the sources. But these laws have resulted in additional topics in the FMP's (example given by topic number in the FMP):</p> <p>129: Where site conditions allow, perform afforestation and reforestation with "close-to-nature" methods and with autochthonous tree species and in a mixture which represents natural development. The afforestation of non-forest areas should be done only where it does not jeopardize rare or endangered non-forest habitat types.</p> <p>Is the law enforced?</p> <p>There are no direct incentives for conversion of forest to agricultural, or any other, land. Agricultural land is mapped by the Ministry for Agriculture. Sometimes these agricultural lands are abandoned for a longer time and overgrown. They might be brought into cultivation again and thus converted back to their original status of agricultural land. But this does not count for conversion by national regulations (source: local expert).</p> <p>Illegal deforestation cannot be assessed in detail because such things are not reported in Croatia but the number of hectares of forest is growing and the growing stock per ha is also increasing (see below).</p> <p>In the period 2006 to 2016 growing stock increased by 5 % (20 658 m3). 80% of the growing stock is in the state forests, while 20% is in private forests. The annual increment is 10 146 149 m3, or 5,87 m3/ha. In the past ten years, a total allowable cut was realized on the surface of 783 4048 ha or 60% of the managed area and the cut was 56 160 375 m3 or 86% of the allowable cut. The realized cut in private forests for the same period was 2</p>
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		<p>392 543 m3 (34% of allowable cut). This means that the stock will keep on growing when the Annual Allowable Cut is not actually harvested. That is also good news for species and habitats as forests in general become older, taller, more natural and left undisturbed for a longer period of time. With these figures in place the amount of illegal harvesting will be low (Sources: FMAP, Statistical yearbook of the republic of Croatia 2018, The forests of Croatia – country report).</p> <p>The CPI index for Croatia in 2019 stands at 47 (where 1 is most corrupt). According to FSC directive (FSC-DIR-40-005) we have to take extra care when the Corruption Perception Index (CPI) for the given country is equal to or below 50. This is the case for Croatia and on top of that there is a downwards trend for the last year which is not good news.</p> <p>Croatia scores 63 (2017) at the "Rule of law" index by the World Bank. World Banks' 'control of corruption' indicator stands at 61 (2017).</p> <p>Its means that in general we will be careful with relying on governmental sources only and we will look at other, independent, sources for confirmations of data and statements where possible.</p> <p>According to the consulted local expert and national media (Google search) there are no cases to be found where forest is converted in an illegal way.</p> <p>Other international sources, like FAO or Global Forest Watch, do not state any problems with Forest law enforcement in Croatia.</p> <p>See also CNRA category 1 for full assessment about illegal harvesting and the status in Croatia.</p> <p><u>Assessment based on spatial data</u></p> <p>Is it possible to conclude that the spatial threshold (0.02% or 5000 ha) is met? I.e. Does the law prohibit conversion to the outcomes in the indicator? Yes or No?</p>
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In summary of the above there are 2 things happening in Croatia:

1. Official forest lands are converted to agriculture and settlements. Most, if not all, of these lands were already without forest cover since the war. Nevertheless, in the cadastre they read forest land (but with a note what is really growing, which is mostly not forest). This is declared as a ' forest loss'.

2. Abandoned agricultural lands and empty forest lands are growing back forest cover. Some of these agricultural lands are also changed in the cadastre to forest lands.

Thus, conversion is possible, to certain limits (see above) and taking into account the regulations.

The applicable legislation does not include regulations regarding spatial thresholds for deforestation, except for a threshold of 4% of buildings in such sites as mentioned in the previous section. Croatia has relevant legislation and strict regulations in order to restrain the conversions. And these regulations are monitored. The majority of land conversions is due to settlements.

Parallel to the process of deforestation, forests are increasing in inaccessible rural areas. The current economic environment is not particularly favorable to land conversion, as explained above (the economic gains from forest management are larger than gains from conversion) (source: local expert).

Table 1: Change use of forests and forest land (comparison between 1986 and 2016) (General Forest Management plan for RH 2015-2026, Statistical Yearbook of the Republic of Croatia 2018, FAO 2015.)

Time	Forest land with forest present
1986	2 061 509
1996	2 078 289
2006	2 402 782
2015	2 416 107
2019	2 496 928

As can be observed in table, there is an increasing forest cover growth. Between 2006 and 2019 the hectares of forests increased with around 94 146 ha. This is around 7 242 ha per year.

Table 2: Forest converted (mining data from CF ltd through local expert. Golf course data, FMP 2017-2025, other data UNFCCC National report (Croatia) 2019). Forest land converted to cropland means lands that are excluded from the General Forest Management Plan (GFMP) because they are actually listed in the cadaster as 'some type of agricultural land' (meadow, olive orchard, vineyard etc.) and there was never forest growing.

Year	Forest land converted to mining (CF ltd data)	Forest land converted to cropland	Forest land converted to settlements	Forest converted to golf courses	Total
1990	NO	NO	225		225
1991	NO	NO	214		214
1992	NO	NO	202		202
1993	NO	NO	190		190
1994	NO	NO	237		237
1995	NO	NO	228		228
1996	NO	NO	217		217
1997	NO	NO	283		283
1998	NO	NO	376		376
1999	NO	NO	397		397
2000	NO	NO	553		553
2001	NO	NO	895		895
2002	NO	NO	1111		1111
2003	NO	NO	1195		1195
2004	NO	84	1488		1572
2005	NO	144	1811		1955
2006	NO	200	2124		2324

2007	NO	494	2190		2684
2008	NO	756	2456	1439	4651
2009	3	1730	2564		4294
2010	21	1072	2742		3814
2011	NO	2406	2767		5173
2012	NO	2614	2908		5522
2013	37	2764	2999		5763
2014	NO	2808	2962		5770
2015	3	3152	3029		6181
2016	7	3182	3048		6230
2017	2	3182	2977		7598
Sum 2008-2017	73	23666	28452	1439	54996
Average/yr	7	2367	2845	144	5500

The table shows that for the period 2008-2017 every year around 5 500 ha are converted to other uses (ex-forest lands (already without forest cover) now declared agricultural lands or lands for settlements). At the same time 7 242 ha per year (2006-2019) is added to the total because of overgrown grass- and agricultural lands or forest lands that are re-stocked. There is thus no annual netto loss of forest when calculating the averages over the last 10 years.

FAO figures (additional check).

FAO published the 'Global Forest Resources Assessment' report for Croatia in 2015.

All figures are also showing an increase in forest area (table 1a in the report).

If we assess the figures for forest plantations (to check conversion, table 2a) we can find that the amount of 'planted forests' in 2015 was 75 000 ha and 76 000 in 2005. It means this is stable over time.

With regards to primary forests converted to plantations the figure is zero for all years (table 2b in the report).

			<p><u>Risk designation</u> Low risk.</p> <p>The following 'low risk' thresholds are met:</p> <p>(1) Thresholds provided in the indicator are not exceeded', AND (3) Other available evidences do not challenge a 'low risk' designation.</p>
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Recommended control measures

Indicator		Recommended control measures
4.1	N/A	

Controlled wood category 5: Wood from forests in which genetically modified trees are planted

Risk assessment

Indicator	Sources of information	Functional scale	Risk designation and determination
<p>5.1</p> <p>There is no commercial use of genetically modified trees.</p>	<p>Croatia's Constitution of 1991 with Amendments through 2014. Specific article 3. https://www.constituteproject.org/constitution/Croatia_2010.pdf?lang=en</p> <p>Forest law 2019 Zakon o šumama (OG 140/05, 82/06, 129/08, 80/10, 124/10, 25/12, 68/12, 148/13, 94/14, 68/18, 14/19) Specific articles 2,3 and 9. https://narodne-novine.nn.hr/clanci/sluzbeni/2018_07_68_1392.html</p> <p>Law on environmental protection 2018 Zakon o zaštiti prirode (OG 80/13, OG 15/18, 14/19) Specific article 4. https://www.zakon.hr/z/403/Zakon-o-za%C5%A1titi-prirode</p> <p>Act on genetically modified organisms, 2005, Zakon o genetički modificiranim organizmima (OG 70/05, Amended 2009, 2013, 2014 and 2018 OG 137/09, 28/13, 47/14, 15/18, 115/18) https://poljoprivreda.gov.hr/pristup-informacijama/zakoni-i-propisi/sumarstvo-297/297 and https://mzoe.gov.hr/o-ministarstvu-1065/djelokrug-4925/zastita-prirode/genetska-raznolikost-1263/namjerno-uvodjenje-gmo-a-u-okolis/1268</p> <p>Act on implementation of EU Directive No 1946/2003 on cross border transport of genetically modified organisms, 2013 Zakon o provedbi Uredbe (EZ) br. 1946/2003 o prekograničnom prijenosu genetski modificiranih organizama (OG 81/13). () https://poljoprivreda.gov.hr/pristup-informacijama/zakoni-i-</p>	<p>Country</p>	<p>Forests and woodlands are of specific interest to the Republic of Croatia and as such are under national protection under the following laws: Constitution, (Art. 3, 52), Forest law (Art 2), the Law on Environmental protection, and the Act on genetically modified organisms. Such is also in line with the Act on implementation of EU Directive No 1946/2003 on cross border transport of genetically modified organisms (about transport of GMOs).</p> <p>In Croatia the potential use of GMO can only take place with a special permit (and in principle only for research purposes or in the agricultural sector). Such is thus explained in the Act on genetically modified organisms.</p> <p>GMO bio material (genetically changed part of plant, animal, microorganism, fungi or virus containing hereditary information) can be put in the environment only based on a permit issued by Ministry of Health (MH) and the Ministry of Agriculture (MA). There is a Council for GMO (established by Ministry of Health) but because the MA is also deciding on food issues the MA is also responsible. The Council for GMO is deciding on every request for use of GMO in research, trials or production in closed or open systems (for agricultural purposes) and can ask for additional documentation to be able to reach a decision. A permit will always come with special conditions and requirements to follow. The Council can thus issue a permit and they produce reports on their activities. All the annual reports since 2009 show that there were no examples or requests to use GMO in forestry (see web page of Ministry of Health, in left column).</p> <p>Regulations based on the Ecological network</p> <p>GMO are not allowed to be put in the area of Natura 2000, any protected areas or areas for ecological protection. Permits for these sites can also not be requested (source: Forest law and Law on Environmental protection).</p> <p>There are also some additional measures set in the various regulations about the Ecological network (Natura 2000). See indicator 1.9 for more information and the sources. But these laws have resulted in additional topics in the FMP's (example given by topic number in the FMP):</p>

<p>propisi/sumarstvo-297/297</p> <p>Fifth National Report to the CDB, 2014. Convention on Biological Diversity, (CBD), https://www.cbd.int/doc/world/hr/hr-nr-05-en.pdf</p> <p>Web page of Ministry of Health , 2019. Reports from Council for GMO (for years 2009, 2010, 2014, 2016 and 2018) https://zdravstvo.gov.hr/djelokrug-1297/sanitarna-inspekcija/gmo/vijece-za-gmo-sjednice-i-priopcenja/4-sjednica-vijeca/3128</p> <p>Rulebook on content and implementation of measures for controlling of no authorised spreading of GMOs in environment 2007, Namjerno uvođenje GMO-a u okoliš (OG 5/07).</p> <p>https://mzoe.gov.hr/o-ministarstvu-1065/djelokrug-4925/zastita-priode/genetska-raznolikost-1263/namjerno-uvodjenje-gmo-a-u-okolis/1268</p> <p>Rulebook on risk assessment for deliberately introducing of GMO in environment, 2006, Namjerno uvođenje GMO-a u okoliš(OG 136/06).</p> <p>https://mzoe.gov.hr/o-ministarstvu-1065/djelokrug-4925/zastita-priode/genetska-raznolikost-1263/namjerno-uvodjenje-gmo-a-u-okolis/1268</p> <p>List of legal entities authorised for administrating of professional risk assessment activities of introducing of GMO in environment, 2010, Namjerno uvođenje GMO-a u okoliš (OG 133/10) https://mzoe.gov.hr/o-ministarstvu-1065/djelokrug-4925/zastita-priode/genetska-raznolikost-1263/namjerno-uvodjenje-gmo-a-u-okolis/1268</p> <p>Study on possible use of GMO in different sectors, forestry included (no examples from Croatia and no plans</p>		<p>126: Preserve biological species significant for the respective habitat types; not to introduce autochthonous and genetically modified organisms.</p> <p>The different procedures for permits and uses are explained in the Rulebook on content and implementation of measures for controlling of no authorised spreading of GMOs in environment, and the Rulebook on risk assessment for deliberately introducing of GMO in environment.</p> <p>The entities and experts involved and to be consulted in such cases are presented in the List of legal entities authorised for administrating of professional risk assessment activities of introducing of GMO in environment.</p> <p>In a special study on GMO the Council for GMO studied the possible use of GMO in different sectors, forestry included. But the conclusion is that there are no examples in Croatia with regards to GM trees and there are no plans for future use.</p> <p>Croatia reported the following to the CBD in the 5th national report (page 83):</p> <p><i>“Use of genetically modified organisms (GMOs). Genetically modified organisms (GMOs) potentially pose a threat to native biodiversity. There was no registered deliberate release of GMOs into environment in Croatia. No GMO crops have been registered either. All 21 counties in Croatia adopted decisions to be GMO-free, the last three of them in the reporting period (2009-2010). Contained use of GMOs in laboratories is implemented under prescribed conditions that include biosafety.”</i></p> <p>The local expert, national media (Google search) or international sources (Google search) do not state anything about the use of GMO trees in Croatia.</p> <p>Risk designation</p> <p>This indicator is considered as low risk. The following ‘low risk’ thresholds are met:</p> <p>(2) There is no commercial use of GMO (tree) species in the area under assessment,</p> <p>AND</p> <p>(3) Other available evidence does not challenge a ‘low risk’ designation.</p>
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	<p>for future use), Council of GMO, 2013 https://zdravstvo.gov.hr/UserDocsImages//dokumenti/Tekstovi%20razni//STUDIJA%20O%20GMO%20VIJE%C4%86E%20ZA%20GMO%202013%20(2).pdf</p> <p>Local expert: Dijana Vuletić, Croatian Forest Research Institute</p> <p>Legal Authority</p> <p>Ministry of Health (MH) and the Ministry of Agriculture (MA) throughout the Council for GMO.</p>		
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GMO Context Question	Answer	Sources of information
<p>1. Is there any legislation covering GMO (trees)?</p>	<p>Yes, not specially only for tree species, but for all GMO's. Forests and woodlands are of specific interest to the Republic of Croatia and as such are under national protection under the laws mentioned in the right column.</p>	<p>Croatia's Constitution of 1991 with Amendments through 2014. Specific article 3. https://www.constituteproject.org/constitution/Croatia_2010.pdf?lang=en</p> <p>Forest law 2019 Zakon o šumama (OG 140/05, 82/06, 129/08, 80/10, 124/10, 25/12, 68/12, 148/13, 94/14, 68/18, 14/19) Specific articles 2,3 and 9. https://narodne-novine.nn.hr/clanci/sluzbeni/2018_07_68_1392.html</p> <p>Law on environmental protection 2018 Zakon o zaštiti prirode (OG 80/13, OG 15/18, 14/19) Specific article 4. https://www.zakon.hr/z/403/Zakon-o-za%C5%A1titi-prirode</p> <p>Act on genetically modified organisms, 2005, Zakon o genetički modificiranim organizmima (OG 70/05, Amended 2009, 2013, 2014 and 2018 OG 137/09, 28/13, 47/14, 15/18, 115/18) https://poljoprivreda.gov.hr/pristup-informacijama/zakoni-i-propisi/sumarstvo-297/297 and https://mzoe.gov.hr/o-ministarstvu-1065/djelokrug-4925/zastita-prirode/genetska-raznolikost-1263/namjerno-uvodjenje-gmo-a-u-okolis/1268</p>

		Act on implementation of EU Directive No 1946/2003 on cross border transport of genetically modified organisms, 2013 Zakon o provedbi Uredbe (EZ) br. 1946/2003 o prekograničnom prijenosu genetski modificiranih organizama (OG 81/13). () https://poljoprivreda.gov.hr/pristup-informacijama/zakoni-i-propisi/sumarstvo-297/297
2. Does applicable legislation for the area under assessment include a ban for commercial use of GMO (trees)?	No.	Same laws as above.
3. Is there evidence of unauthorized use of GM trees?	No.	Web page of Ministry of Health , 2019. Reports from Council for GMO (for years 2009, 2010, 2014, 2016 and 2018) https://zdravstvo.gov.hr/djelokrug-1297/sanitarna-inspekcija/gmo/vijece-za-gmo-sjednice-i-priopcenja/4-sjednica-vijeca/3128 The local expert, national media (Google search) or international sources (Google search) do not state anything about the use of GMO trees in Croatia.
4. Is there any commercial use of GM trees in the country or region?	No.	Web page of Ministry of Health , 2019. Reports from Council for GMO (for years 2009, 2010, 2014, 2016 and 2018) https://zdravstvo.gov.hr/djelokrug-1297/sanitarna-inspekcija/gmo/vijece-za-gmo-sjednice-i-priopcenja/4-sjednica-vijeca/3128 Fifth National Report to the CDB, 2014 Convention on Biological Diversity, (CBD), https://www.cbd.int/doc/world/hr/hr-nr-05-en.pdf
5. Are there any trials of GM trees in the country or region?	No.	Web page of Ministry of Health , 2019. Reports from Council for GMO (for years 2009, 2010, 2014, 2016 and 2018) https://zdravstvo.gov.hr/djelokrug-1297/sanitarna-inspekcija/gmo/vijece-za-gmo-sjednice-i-priopcenja/4-sjednica-vijeca/3128 Fifth National Report to the CDB, 2014. Convention on Biological Diversity, (CBD), https://www.cbd.int/doc/world/hr/hr-nr-05-en.pdf

6. Are licenses required for commercial use of GM trees?	Yes.	See mentioned laws in first row above.
7. Are there any licenses issued for GM trees relevant for the area under assessment? (If so, in what regions, for what species and to which entities?)	No.	Web page of Ministry of Health , 2019. Reports from Council for GMO (for years 2009, 2010, 2014, 2016 and 2018) https://zdravstvo.gov.hr/djelokrug-1297/sanitarna-inspekcija/gmo/vijece-za-gmo-sjednice-i-priopcenja/4-sjednica-vijeca/3128 Fifth National Report to the CDB, 2014 Convention on Biological Diversity, (CBD), https://www.cbd.int/doc/world/hr/hr-nr-05-en.pdf
8. What GM 'species' are used?	N/A	
9. Can it be clearly determined in which MUs the GM trees are used?	N/A	

Recommended control measures

Indicator	Recommended control measures
5.1	N/A