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## THE ROLE OF NON-GOVERNMENTAL ORGANISATIONS IN ENVIRONMENTAL PROTECTION CASES IN THE REPUBLIC OF POLAND: A CASE STUDY OF THE BIAŁOWIEŻA FOREST

### | Abstract

- ▶ *Goal* – The purpose of this article is to examine what role non-governmental organisations play in the environmental issues occurring in the Republic of Poland.
- ▶ *Research methodology* – The used methods include: literature analysis, case law analysis, case study, and comparative analysis.
- ▶ *Score/results* – The article demonstrates that non-governmental organisations play a very important role in matters related to environmental protection occurring in the Republic of Poland, and that through their activities they are able to exert a real influence on the shape of the state's environmental policy and on socially significant issues.
- ▶ *Originality/value* – The research undertaken in this article makes it possible to assess the role that non-governmental organisations play in matters related to environmental protection occurring in the Republic of Poland, and whether they can exert a real influence on the shape of the state's environmental policy and on socially significant issues. This subject has not yet been subjected to an in-depth analysis.

| **Keywords:** non-governmental organisations, Białowieża Forest, environmental protection

### 1. Introduction

Environmental protection is one of the most significant challenges of the 21st century. We face many global crises in today's world, but the environmental crisis is becoming the most fundamental. It affects all aspects of our existence,

such as health, security, economy, quality of life and even the future of our planet [Lorey, 2003: XI]. In times of progressive climate change, degradation of ecosystems, massive extinction of species and increasing pollution, caring for nature is no longer just a choice, it is becoming a necessity. The current environmental problems require the active participation of civil society. Social organisations play an increasingly important role in mobilising public opinion monitoring the activities of the administration and enforcing national and EU laws. The 2016–2018 conflict over the Białowieża Forest was one of the best-known cases of the NGO involvement in the defence of the environment in Poland [Kula et al., 2024: 481–492].

The aim of this article is to examine whether the role of non-governmental organisations in environmental cases occurring in the Republic of Poland enables them to have a real impact on socially important issues. Due to the broadness of the proceedings that concern the examined scope, the considerations in this article are based on the example of the proceedings pending against the Republic of Poland in the Białowieża Primeval Forest case. The used methods included: the analysis of literature, jurisprudence, legal acts, position of doctrine, representatives of science and documents obtained from the European Commission through a request for public information. They take into account the legal status as of 12 June 2025.

## 2. Legal basis for non-governmental organisations participation in environmental matters

The activities of non-governmental organisations in the field of environmental protection in the Republic of Poland are based on solid legal foundations, both national and international.

It stems first and foremost from the Constitution of the Republic of Poland, which in Article 74(4) obliges public authorities to support the activities of citizens for the protection and improvement of the environment [The Constitution of the Republic of Poland, 1997: Article 74]. Whereas Article 86 of the Constitution of the Republic of Poland further specifies that “everyone is obliged to care for the state of the environment and bears responsibility for any deterioration caused by themselves” [The Constitution of the Republic of Poland, 1997: Article 86]. Other more specific provisions can be found, inter alia, in the Act of 27 April 2001 – Environmental Protection Law, in which Article 4(1)

indicates that “the general use of the environment shall be granted by law to everyone...” [Environmental Protection Law, 2001: Article 4, paragraph 1] and in Articles 44 and 45 of the Act of 3 October 2008 on the provision of information on the environment and its protection, public participation in environmental protection and environmental impact assessments, which confer on environmental organisations the right to participate in proceedings and lodge appeals and to cooperate in the field of environmental protection with administrative authorities [on Access to Environmental Information, Environmental Protection, Public Participation in Environmental Protection, and Environmental Impact Assessments, 2008: Articles 44 and 45]. In addition, the Act of 14 June 1960 – the Code of Administrative Procedure in Article 31 allows the participation of a social organisation in administrative proceedings [Code of Administrative Procedure, 1960: Article 31].

In terms of the European Union law, non-governmental organisations are guaranteed access to information, participation in decision-making and the right to challenge decisions relating to the environment under the Convention ratified by the Republic of Poland in 2003, drawn up in Aarhus on 25 June 1998 on access to information, public participation in decision-making and access to justice in environmental matters (the so-called Aarhus Convention) [Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters, 1998]. Furthermore, the Treaty on the Functioning of the European Union itself requires the Republic of Poland, as a Member State of the European Union, to respect its provisions and to implement them in its legal order. From the point of view of environmental protection, Article 11 thereof is the most relevant; according to it “environmental protection requirements must be integrated into the definition and implementation of the Union policies and activities, in particular with a view to promoting sustainable development”. [Treaty on the Functioning of the European Union, 2016: Article 11] It also regards Articles 191, 192 and 193, which set out the objectives of environmental policy, the measures designed to achieve them and the possibility of maintaining or introducing more stringent protective measures, provided that they are compatible with the Treaties and have been notified to the Commission [Treaty on the Functioning of the European Union, 2016: Articles 191–193].

All of the provisions indicated above provide a legal framework for NGOs to take action to protect the environment.

### 3. The significance of the Białowieża Forest

The Białowieża Forest is one of the most valuable and oldest forest complexes in Europe. It is located on the border between Poland (in the Podlaskie Voivodeship) and Belarus (in the Brest Oblast). Its area covers about 1 500 km<sup>2</sup>, including about 62 000 ha on the Polish side, which is more than 42% of its total area. It is the last of its kind preserved fragment of the original lowland forest [Jalinik, 2024: 5]. For centuries, this area served as hunting grounds for Polish and Russian rulers, which ensured its protection from human interference. Since the 1920s, some parts of the forest have been granted formal protection – initially as nature reserves, and later also as the Białowieża National Park [Palowski, 2002: 93], which covers about one sixth of the Polish part of the primeval forest and it is divided into partial and strict protection zones. The remaining areas are managed by the State Forests through the Białowieża, Browsk and Hajnówka Forest Districts. The Forest Service conducts conservation activities in the primeval forest areas to preserve habitats and endangered species. It should be noted that almost a quarter of the areas managed by the forest inspectorates have the status of nature reserves [Jalinik, 2024: 6].

Due to such measures, a large part of the primeval forest has avoided traditional forest management and this has allowed the ongoing natural ecological processes since the end of the last glaciation to continue undisturbed. In addition, the Białowieża Forest was one of the first natural sites in the world to be included on the UNESCO World Heritage List, which underlines its exceptional importance for nature conservation. There is no other area in the Republic of Poland of such key importance for the preservation of biodiversity. Due to its values, it was also inscribed on the UNESCO list of biosphere reserves [Yarmashevich, Kozak, 2022: 174] as the Białowieża Biosphere Reserve [Kujawa et al., 2016: 303], task of which is not only to protect unique natural resources, but also to conduct research on the functioning of natural forest ecosystems and build public awareness of the links between ecological and cultural diversity [Jalinik, 2024: 6]. In addition, the Białowieża Forest is characterised by its exceptional natural uniqueness. It is home to rare and endangered plant and animal species. It is also of great importance to the world of science. For this reason, Białowieża Primeval Forest was included in the Natura 2000 network and protected as a Special Bird Protection Area (SPA) and Special Habitat Protection Area (SAC) [Olaczek, 2010: 33–42]. There is no doubt, therefore, that the Białowieża Forest is an extremely important area, not only for Poland, but also for the European Union and the whole world.

#### 4. The problem of the massive gradation of the European spruce bark beetle

The European spruce bark beetles are a common species in Poland and in other European countries, and have also been recorded in countries such as China, Korea and Japan, among others. Their main host plant is Norway spruce, so it feeds mainly in forests with only spruce trees and in mixed stands with a high or significant proportion of spruce trees. They are prone to mass reproduction, especially when spruce stands are weakened or damaged by a variety of biotic and abiotic factors [Grodzki, 2013: 20–22].

When the normal ecological balance is maintained, this species serves as a natural selective agent, removing weakened trees from the stands. Regardless of the causes of the trees' weakening or the length of the chain of events leading to this condition, the spruce bark beetle usually represents the final stage, contributing to the death of the infested tree. In properly functioning ecosystems, its role is therefore entirely secondary, since the presence of the beetle (in all developmental stages) on living trees is always associated with reduced vitality and, in particular, with diminished resistance. The problem with the spruce bark beetle arises when it changes its role and shifts from being a secondary selective agent to a primary one, resulting in the elimination of trees that still show relatively high vitality. This shift occurs when the resistance of trees in a given stand rapidly decreases or when the beetle population suddenly increases – sometimes both phenomena happen simultaneously, mutually reinforcing their effects [Grodzki, 2022: 475–476].

There are several methods of protecting the forest against the bark beetle attacking healthy trees. These include measures such as the use of trap trees, pheromone traps, debarking, spraying felled trees or the use of insecticidal nets, but these only play a supporting or intervention role. The most effective method is to systematically search for and remove bark beetle-infested trees from the forest, before a new generation of insects has emerged. The key role in this method is to remove trees under the bark of which the larval stages of the bark beetle develop in good time to prevent them from transforming and leaving the tree. This action is an example of sanitary pruning, which is selective in nature – only trees actually controlled by the pest are eliminated. Failure to take such action, especially during a period of increasing infestation, encourages a rapid increase in the bark beetle population. A similar effect is achieved by leaving bark beetle-infested, fallen or broken trees in the forest, which provide an ideal breeding ground for them [Grodzki, 2016: 328].

## 5. The dispute over the method of protecting the Białowieża Forest

### 5.1. The position of the Ministry of the Environment and the State Forests

The Ministry of the Environment and the State Forests has played a key role in the dispute over the future and protection of the Białowieża Forest. Faced with a massive bark beetle gradation in the Białowieża Forest, the Polish authorities decided on 25 March 2016 to approve an annex to the forest management plan for the Białowieża Forest District. As a result, timber harvesting was tripled – from about 63 000 m<sup>3</sup> to 188 000 m<sup>3</sup> in the period 2012–2021 and forest management, including sanitary cutting, afforestation and deforestation, was allowed, also in the areas that had previously been completely excluded from human interference [Letter of Formal Notice – Infringement No. 2016/2072, 2016: 2]. The decision to approve an annex to the forest management plan for the Białowieża Forest District was not taken by chance and without any forethought; it made a certain sense from the point of view of the State Forests. The annex in question was prepared by the State Forests, namely by the Bureau for Forest Management and Geodesy, while the Minister of the Environment decided to sign it. Actions were taken on the basis of the provisions of the Forest Act [Act on Forests, 1991] and implementing regulations, and, in particular, on the basis of Article 10(1)(1) of the Forest Act, which indicates that “in the event of the occurrence of harmful organisms to the extent that the sustainability of the forests is threatened, the forest district manager (...) shall carry out eradication and protection measures”, and according to paragraph 3 of that article, “in the event of the need to carry out eradication and protection measures on the area of two or more forest districts, the implementation of the measures referred to in paragraph 1(1) shall be ordered by the director of the regional directorate of the State Forests” [Act on Forests, 1991: Article 10]. The Polish authorities, in approving the annex to the forest management plan for the Białowieża Forest District, were therefore convinced that they were acting in the public interest and in a lawful manner.

The Ministry of the Environment and the State Forests indicated as reasons for taking such action mainly the huge gradation of the spruce bark beetle (*Ips typographus*), which, in their view, led to the mass death of spruce trees and posed a threat to the sustainability of the forest ecosystem. These institutions indicated that failure to intervene could lead to irreversible degradation of forest habitats and to a decline in biodiversity. Therefore, the Polish authorities promoted the model of “active nature conservation” as a form of nature management, i.e. a form

that allows actions such as removing dead trees or carrying out sanitary pruning. Another very important argument raised to justify the need to cut down trees in the Białowieża Forest was the preservation of public safety. The Ministry of the Environment and the State Forests pointed out that the mass die-off of spruce trees caused by the bark beetle infestation leads to numerous dead and weakened trees, which can fall over onto forest roads, hiking trails and areas used by the local community. In this context, it was stressed that maintaining the safety of forest users, including tourists and forest workers, is an obligation of the land manager under national law, in particular the Civil Code [Civil Code, 1964:] and the Forest Act [Act on Forests, 1991]. In addition, it was pointed out that leaving dead trees on a large scale risks not only collapsing stands, but also blocking fire roads and posing a threat to emergency services and possible firefighting operations. In the view of the Ministry of the Environment, these actions were “to protect human life and health” and, therefore, in accordance with Article 6(3) of the Habitats Directive [Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora, 1992] – did not require a prior environmental impact assessment as long as they were proportionate and justified. The Polish authorities also emphasised that restricting access to the Forest or closing off whole sections of it was not possible due to its social importance and its status as a recreational and tourist area. In their view, the rational removal of endangered trees was intended to serve both nature conservation and human protection [Reasoned Opinion addressed to the Republic of Poland – Infringement, No. 2016/2072, 2016: 6].

## 5.2. The position of non-governmental organisations

The problem occurring in the Białowieża Primeval Forest and the decisions taken on this issue have been recognised by NGOs such as, for example, the Greenpeace Polska Foundation, WWF (World Wide Fund for Nature), Dzika Polska Foundation, Strefa Zieleni Foundation, Greenmind, Klub Przyrodników, Pracownia na rzecz Wszystkich Istot, Polskie Towarzystwo Ochrony Przyrody “Salamandra” and Stowarzyszenie dla Natury “Wilk”. Their position was strongly opposed to the increased felling of trees, and as a result, the decision by the Polish authorities to allow this was severely criticised by environmental organisations. They considered it incompatible with the opinions of the key scientific bodies in Poland, as well as a violation of Poland’s international obligations, and advocated the preservation of the Forest as a natural forest [Wesolowski et al., 2016: 85]. They argued that

felling trees as a means of controlling the bark beetle is not a good solution. They pointed out that cutting down diseased trees could only be effective if the majority (at least 80%) of the spruce trees infested by the bark beetle could be removed from the entire forest complex in a short period of time, which is impossible in a place such as the Białowieża Forest, which includes extensive reserves and a national park. Therefore, invoking the need to “fight the bark beetle” to justify logging has no scientific justification, according to them. Furthermore, the NGOs argued that the Białowieża Forest was naturally created and should remain so. In their view, the problem is not the extinction of the forest, but the interference with its natural processes. According to NGOs, dead spruce trees attacked by the bark beetle have an important role in the forest – as they decompose they enrich the soil and provide shelter for many animal species. Cutting down and removing these trees does not help but actually harms the ecosystem and leads to its depletion. Without human interference, new trees will grow on their own in place of the dead ones, and the Białowieża Forest will only survive and retain all its values if it is allowed to function in accordance with natural processes [Wesolowski et al., 2016: 88–92].

In order to save the Białowieża Forest, seven NGOs (ClientEarth, Greenpeace Polska, Dzika Polska, WWF Polska, Greenmind, Ogólnopolskie Towarzystwo Ochrony Ptaków and Pracownia na rzecz Wszystkich Istot) filed a complaint with the European Commission reporting a breach of EU law by the decision to approve an annex to the forest management plan for the Białowieża Forest District. In this complaint, they pointed out, among other things, that the increased felling of trees does not protect the Forest and is ineffective in combating the bark beetle, which is a natural part of the Forest’s ecosystem. In addition, they stressed that there had been no proper assessment, as required by European Union law, of the impact of the signed annex on protected habitats and species, that the annex was in breach of EU directives and that, under national law, there were no legal remedies which could change the decision taken by the Polish authorities [www 1].

In addition, NGOs carried out various educational activities, protests and information campaigns to raise public awareness of the natural values of the Białowieża Forest and of the dangers of mass logging. They created petitions in defence of the Białowieża Forest, which gathered very large numbers of signatures and publicised the issue not only in Poland, but also internationally. They created reports that were submitted to the European Commission. On a social initiative, a “Camp for the Forest” was set up in which activists, scientists and volunteers conducted field patrols where they documented logging in the Forest, including

the felling of trees in Natura 2000 protection zones and UNESCO areas. The camp also organised logging blockades, such as chaining themselves to equipment and machinery to prevent further work. It also conducted educational activities, workshops and media campaigns to inform the public about the effects of logging on biodiversity and the integrity of forest ecosystems [www 2; www 3].

The efforts of non-governmental and civil society organisations have led to the widespread public support for the protection of the Forest, and have also attracted the attention of the European Commission, which, on the basis of the received information, has initiated proceedings against the Republic of Poland under Article 258 of the Treaty on the Functioning of the European Union [Treaty on the Functioning of the European Union, 2016: Article 258]. Information provided by NGOs about the progressive logging and its irreversible effects on the Forest led the Court of Justice of the European Union to issue proceedings on 20 November 2017 for an interim measure – an order to immediately halt forestry work in the Forest [Order of the Court of Justice of the European Union of 20 November 2017 in case C-441/17 R], and on 17 April 2018, a judgment was handed down in this case stating that Poland's actions were incompatible with the European Union law [Judgment of the Court of Justice of the European Union of 17 April 2018 in case C-441/17].

## 6. Conclusions

The approach to the problem of protecting the Białowieża Forest by NGOs and by the state authorities represented by the Ministry of the Environment and the State Forests is quite different. NGOs are in favour of minimal human interference and advocate leaving nature alone, even if this means natural transformations resulting in the disappearance of some habitats and species. State authorities, on the other hand, recognise that without human support, complex ecological processes could be disrupted, resulting in a decline in biodiversity and degradation of this unique ecosystem [Jalinik, 2024: 5–6]. On the surface, it might seem that nothing can be done about the decision taken by the state authorities to approve an annex to the forest management plan for the Białowieża Forest District, but the example of this situation shows how powerful NGOs are.

The carried out analysis showed that although environmental protection is today one of the key responsibilities of public authorities [Kiedrzynek, 2017: 105], NGOs play an important and influential role in this field.

The case study of the dispute over the Białowieża Forest showed that the activities of NGOs are not limited to educational or informational activities, but also enable them to have a real impact on the decisions of those in power. Although the approach to the problem of protection of the Białowieża Forest by NGOs and the state authorities represented by the Ministry of the Environment and the State Forests was quite different. NGOs were in favour of minimal human interference and advocated leaving nature alone, even if this meant natural transformations resulting in the disappearance of some habitats and species. State authorities, on the other hand, recognised that without human support, complex ecological processes could be disrupted, which could result in a decline in biodiversity and in degradation of this unique ecosystem [Jalinik, 2024: 5–6]. Although the decision approving the annex to the forest management plan for the Białowieża Forest District had already been made – and it might have seemed that it could no longer be changed – this situation demonstrates the tremendous power of non-governmental organisations. Due to their involvement, it was possible not only to draw public attention to the illegal logging, but also to actively participate in the proceedings before the Court of Justice of the European Union by initiating the case and providing information and evidence crucial to the matter. This contributed to the Court of Justice of the European Union issuing a judgment confirming that Poland had violated EU law. The actions of non-governmental organisations led to the suspension of the destructive practices taking place in the Białowieża Forest and drew public attention to the need to preserve it as one of Europe's most valuable natural areas.

This case highlights that contemporary challenges related to the natural environment are not the exclusive domain of state institutions but require the active involvement of various non-governmental organisations. The example of the Białowieża Forest demonstrates that these organisations, through their impact on environmental protection, can act as guardians of the public interest, and that their actions have a real influence on the shape of a country's environmental policy and on socially important issues. Moreover, this case shows that a strong civil society, represented by non-governmental organisations, is an essential element of the environmental protection system, and that the role of these organisations in enforcing regulations and shaping environmental policy should be strengthened both in national and European law.

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