



# SHARRI NATIONAL PARK: THE TARGET OF CRIME



**KOSID**

KOSOVO CIVIL SOCIETY CONSORTIUM FOR  
SUSTAINABLE DEVELOPMENT

KONSORCIUMI KOSOVAR I SHOQËRISE CIVILE PËR  
ZHVILLIM TË QËNDRUESHËM

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# TABLE OF CONTENTS

<b>ACRONYMS</b> .....	<b>5</b>
<b>Summary:</b> .....	<b>6</b>
<b>Introduction:</b> .....	<b>6</b>
<b>Objectives:</b> .....	<b>9</b>
<b>Questions:</b> .....	<b>9</b>
<b>Findings</b> .....	<b>9</b>
<b>◆Wildfires:</b> .....	<b>10</b>
<b>◆Illegal logging</b> .....	<b>13</b>
<b>◆Hunting and poaching</b> .....	<b>17</b>
<b>CONCLUSION</b> .....	<b>21</b>
<b>A.Natural aspects</b> .....	<b>21</b>
<b>B.Legal aspect</b> .....	<b>22</b>

## ACRONYMS

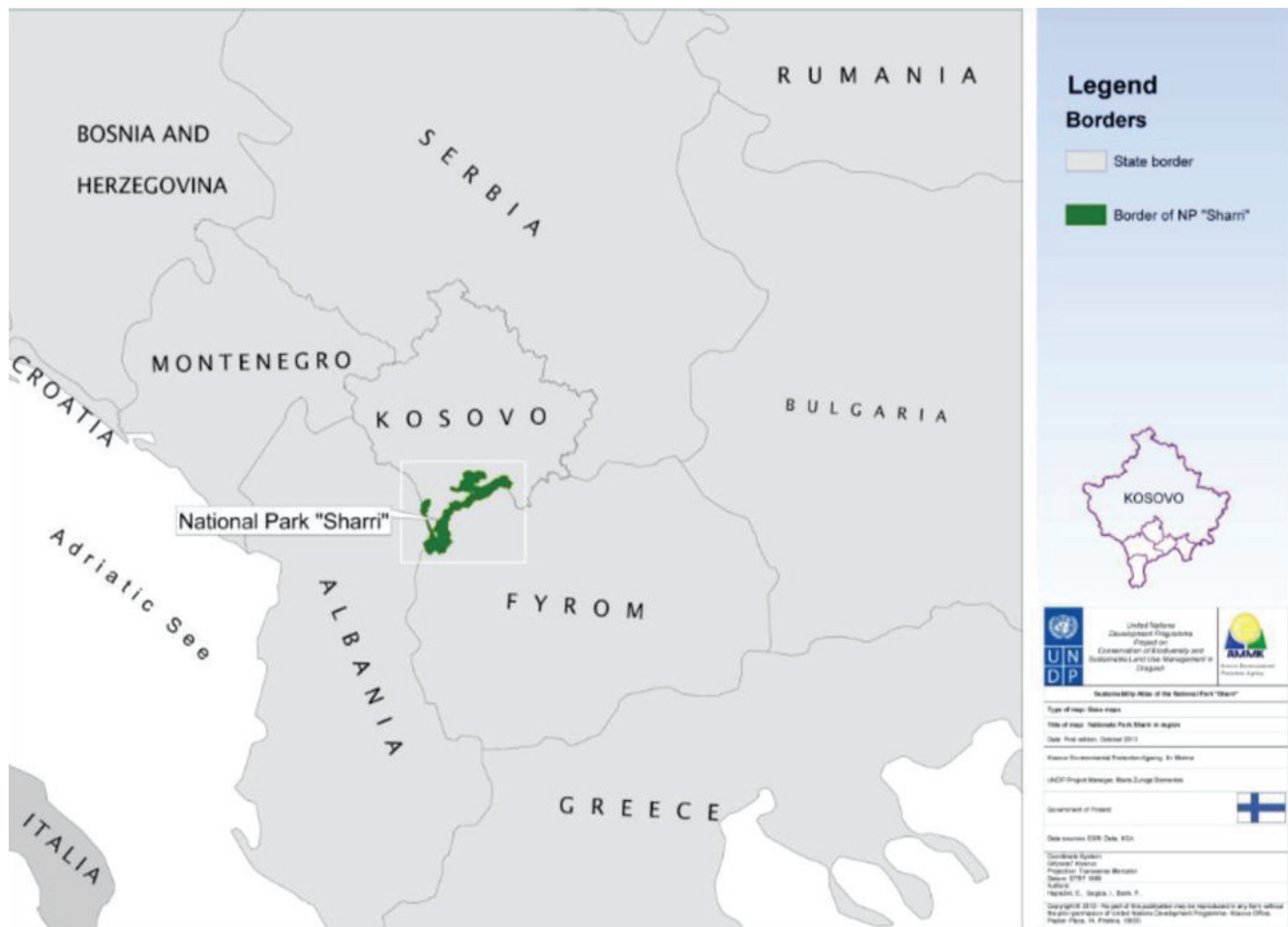
<b>DANP</b>	Directorate for the Administration of the Sharri National Park
<b>MESP</b>	Ministry of Environment and Spatial Planning
<b>KEPA</b>	Kosovo Environmental Protection Agency
<b>IEA</b>	Important Ecological Area
<b>SPZ</b>	Special Protective Zones
<b>MAFRD</b>	Ministry of Agriculture, Forestry and Rural Development



## SHARRI NATIONAL PARK: THE TARGET OF CRIME

**Summary:** This study aims to highlight issues facing the Sharri National Park, the most serious of which include: illegal logging, poaching, and wildfires. Meanwhile, understaffing at the DANP, organized crime, and failures to enforce legislation have led to the irrevocable degradation of flora in several parts of the Park, as well as a loss of fauna through poaching. Various animals, ecosystems and the ecological pyramid of the habitat are all being continually degraded.

**Introduction:** The Sharri National Park is Kosovo's oldest national park, first being recognised as such in 1986. The functioning of the Sharri National Park began in 1995, but was interrupted in 1999, only being reactivated in May 2002.<sup>1</sup>



*Location of Sharri National Park in Kosovo, and the region<sup>2</sup>*

The Sharri National Park is situated in southern Kosovo, with the Law on the Sharri National Park (2012) defining the park's territory as covering an area of 53,469 ha. The park falls under the designation of five municipalities: Kaçanik (4.1%), Shterpce (23.9%), Suhareka (4.7%), Prizren (22.2%) and Dragash (45.1%).<sup>3</sup>

1. See: <http://ammk-rks.net/?page=1,123>

2. See: [http://www.ammk-rks.net/repository/docs/Plani\\_i\\_menaxhimit\\_i\\_PK\\_Sharri\\_2015-2024.pdf](http://www.ammk-rks.net/repository/docs/Plani_i_menaxhimit_i_PK_Sharri_2015-2024.pdf)

3. See: [https://www.ammk-rks.net/repository/docs/Plani\\_i\\_menaxhimit\\_i\\_PK\\_Sharri\\_2015-2024.pdf](https://www.ammk-rks.net/repository/docs/Plani_i_menaxhimit_i_PK_Sharri_2015-2024.pdf), page 14.



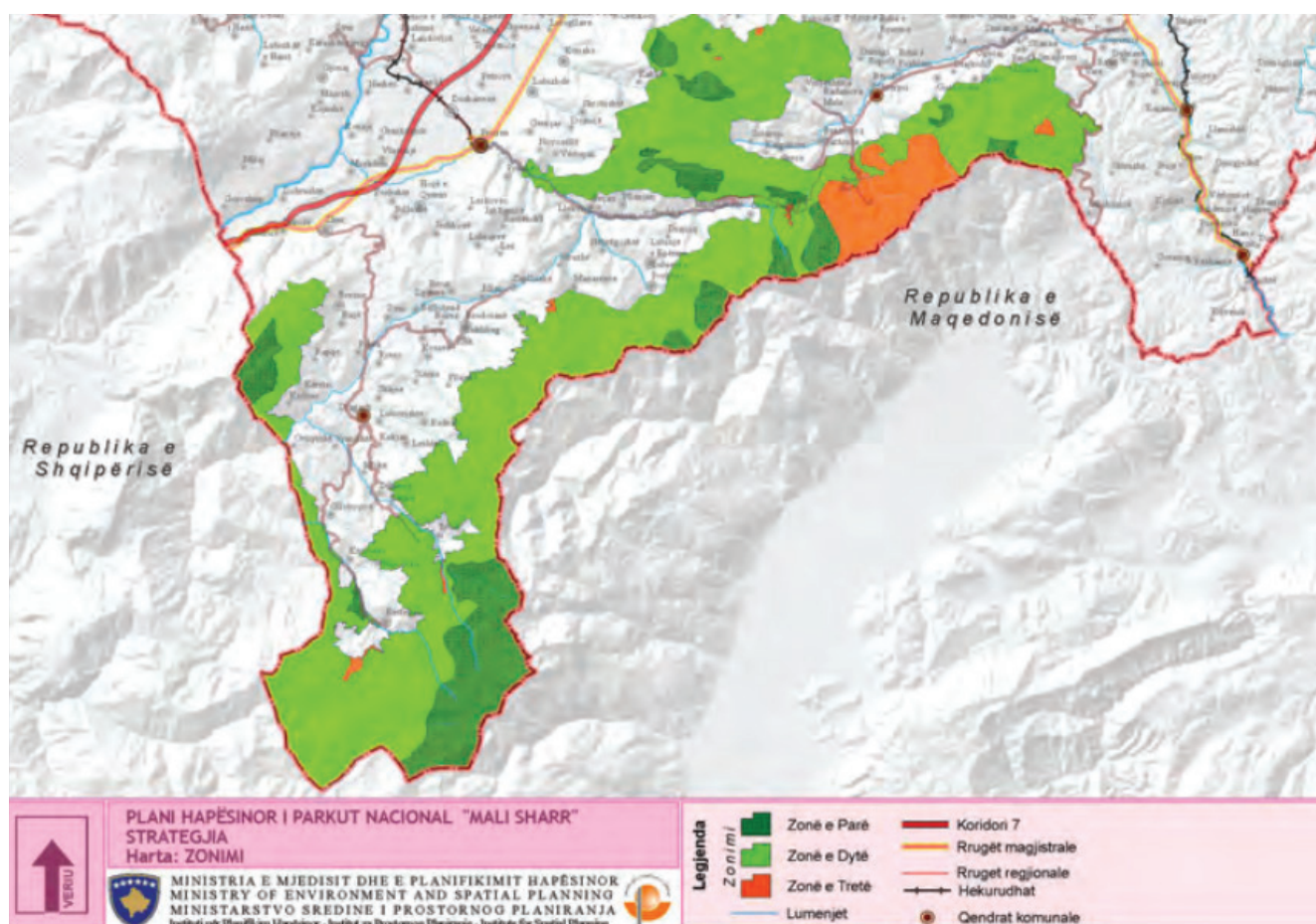
## SHARRI NATIONAL PARK: THE TARGET OF CRIME



The protection of the Sharri National Park and its natural environment is envisaged by three laws: Law No. 04/L – 087 on the Sharri National Park<sup>4</sup>, Law No. 03/L-233 on Nature Protection<sup>5</sup> and Law No. 03/L-025 on Environmental Protection.<sup>6</sup> In addition, the management of the Sharri National Park is regulated through the Spatial Plan for the Sharri National Park and the Management Plan of the Sharri National Park<sup>7</sup>

According to the Law on Nature Protection (2010) a National Park is a natural territory with the following functions:

- a) Protecting ecological ensembles of one or more ecosystems for today's and future generations;
- b) Excluding utilization or usurpation with the aim of changing and damaging nature;
- c) Providing bases for spiritual, scientific, educational, recreational, and cultural purposes and enabling visits in accordance with the principles of natural protection.<sup>8</sup>



Functional areas of the Sharri National Park<sup>9</sup>

4. See: <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2866>

5. See: <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2716>

6. See: <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2631>

7. See: [http://www.ammk-rks.net/repository/docs/PHPK\\_Sharri\\_shq.pdf](http://www.ammk-rks.net/repository/docs/PHPK_Sharri_shq.pdf)

8. See: [https://www.ammk-rks.net/repository/docs/Plani\\_i\\_menaxhimit\\_i\\_PK\\_Sharri\\_2015-2024.pdf](https://www.ammk-rks.net/repository/docs/Plani_i_menaxhimit_i_PK_Sharri_2015-2024.pdf)

9. See: [http://www.ammk-rks.net/repository/docs/Plani\\_i\\_menaxhimit\\_i\\_PK\\_Sharri\\_2015-2024.pdf](http://www.ammk-rks.net/repository/docs/Plani_i_menaxhimit_i_PK_Sharri_2015-2024.pdf)



Article 3 of the Law on the Sharri National Park provides the requirements for functional zones of the Park,<sup>10</sup> and, according to the Spatial Plan, the Park is divided into three zones, as follows:

1. **Strict Protection Zone (First Protection Zone):** Includes territory within the park that has exceptional natural features, rare species, endangered plants and animals, and types of habitats existing in the wild.<sup>11</sup>
2. **Active Management Zone (Second Protection Zone):** Includes territory within the Sharri National Park that is characterized by ecosystems, scenic landscapes and other natural values. In this zone, ecotourism, traditional agriculture and other activities can be developed which are not in breach of protective regulations.<sup>12</sup>
3. **Sustainable Use Zone (Third Protection Zone):** Includes territory within the Park that is designated for: construction, reconstruction, protection of traditional and recreational facilities, tourism and the needs of local residents. In this zone agricultural and economic activities are permitted along as they are in line with the Law on Protection of Nature and other relevant laws, and the Spatial Plan for the National Park.<sup>13</sup>

There is also a so-called **Buffer Zone:** An area of fifty (50) meters from the border of the Sharri National Park, where the second protection applies, to help prevent any adverse impacts on the park.<sup>14</sup>

Other laws supporting the management and protection of the Sharri National Park include Law No. 2003/3 on Forests in Kosovo<sup>15</sup>, Law No. 2004/29 Amending and Supplementing the Law No. 2003/3 on Forests on Kosovo,<sup>16</sup> and Law No. 03/L-153 Amending and Supplementing the Law No. 2003/3 on Forests in Kosovo<sup>17</sup>.

The overall vision for the Sharri National Park is as follows:

- A carefully managed Park for future generations that is biologically diverse and features unique landscapes, including settlements and traditional lifestyles that are appreciated, protected and developed. A Park in which economic benefits serve the interests of environmental protection and local communities, while also being accessible, and offering visitors enjoyment through recreation, sport, and cultural and scientific research opportunities.<sup>18</sup>

The natural values of the Sharri National Park include a range of ecosystems in good condition and including varying substrates, from high mountains to foothills. Flora and fauna are almost completely intact, and include many rare and endemic species,<sup>19</sup> while forest areas comprise around 35% (18,298.82 ha) of the total area of the Sharri National Park.<sup>20</sup>

10. See: <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2866>

11. See: [http://www.ammk-rks.net/repository/docs/Plani\\_i\\_menaxhimit\\_i\\_PK\\_Sharri\\_2015-2024.pdf](http://www.ammk-rks.net/repository/docs/Plani_i_menaxhimit_i_PK_Sharri_2015-2024.pdf), page 9

12. See: [http://www.ammk-rks.net/repository/docs/Plani\\_i\\_menaxhimit\\_i\\_PK\\_Sharri\\_2015-2024.pdf](http://www.ammk-rks.net/repository/docs/Plani_i_menaxhimit_i_PK_Sharri_2015-2024.pdf), page 9

13. See: [http://www.ammk-rks.net/repository/docs/Plani\\_i\\_menaxhimit\\_i\\_PK\\_Sharri\\_2015-2024.pdf](http://www.ammk-rks.net/repository/docs/Plani_i_menaxhimit_i_PK_Sharri_2015-2024.pdf), page 9

14. See: [http://www.ammk-rks.net/repository/docs/Plani\\_i\\_menaxhimit\\_i\\_PK\\_Sharri\\_2015-2024.pdf](http://www.ammk-rks.net/repository/docs/Plani_i_menaxhimit_i_PK_Sharri_2015-2024.pdf), page 9

15. See: <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2566>

16. See: <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2566>

17. See: <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2668>

18. See: [https://www.ammk-rks.net/repository/docs/Plani\\_i\\_menaxhimit\\_i\\_PK\\_Sharri\\_2015-2024.pdf](https://www.ammk-rks.net/repository/docs/Plani_i_menaxhimit_i_PK_Sharri_2015-2024.pdf)

19. See: [https://www.ammk-rks.net/repository/docs/Plani\\_i\\_menaxhimit\\_i\\_PK\\_Sharri\\_2015-2024.pdf](https://www.ammk-rks.net/repository/docs/Plani_i_menaxhimit_i_PK_Sharri_2015-2024.pdf)

20. See: [https://www.ammk-rks.net/repository/docs/Raporti\\_i\\_Natyres\\_2010-2014\\_web.pdf](https://www.ammk-rks.net/repository/docs/Raporti_i_Natyres_2010-2014_web.pdf), page 45.



The most challenging factors affecting forestry in Kosovo are poor management, degradation of forest land due to illegal logging, uncontrolled gravel extraction, the impacts of harmful animals or insects, such as the pine processionary (*Thaumetopoea pityocampa*), diseases, and forest fires.

Another challenge is the inadequate economic management of forest management areas in Koritnik, Dragash, Kaçanik and Shterpce. Meanwhile illegal logging is widespread, with logs often being used for firewood. Over 500 lawsuits have been filed against illegal loggers over the past 10 years.<sup>21</sup>

Illegal hunting is also a challenge. “Uncontrolled hunting and poaching endangers all species, particularly rare ones,” Sadri Hodaj from the Sharri Hunters Association in Prizren stated. “The most endangered wild animals in our area are bears and deer, and this is a result of uncontrolled hunting and poaching.” Hodaj believes this situation can only be fixed if the law is properly implemented.<sup>22</sup> “Hunting is prohibited in the Sharri National Park, but it is carried out in Dragash through hunting clubs,” he added.<sup>23</sup>

### Objective:

This analysis aims to identify problems and irregularities in the Sharri National Park that have led to the degradation of flora and fauna, the impact on biodiversity in the area, as well as the impact of humans on the ecosystem surrounding the Park. To summarise, the main threats to the values of the Sharri National Park are:

- a) Hunting and poaching
- b) Wildfires
- c) The degradation of forests through deforestation

### Questions:

This analysis addresses the following questions:

- 1) What is the extent of deforestation in the Sharri National Park?
- 2) What is the extent of hunting and poaching in the Sharri National Park?
- 3) How prevalent and frequent are wildfires in the Sharri National Park and what are the causes?

### Findings:

This analysis of the Sharri National Park, prepared by KOSID, is broken down into three sections: illegal logging, wildfires, and hunting and poaching. After research, interviews, and reviews of various reports, KOSID reached the following findings.

21. See: [https://www.ammk-rks.net/repository/docs/Plani\\_i\\_menaxhimit\\_i\\_PK\\_Sharri\\_2015-2024.pdf](https://www.ammk-rks.net/repository/docs/Plani_i_menaxhimit_i_PK_Sharri_2015-2024.pdf)

22. See: <https://kallxo.com/gjate/hulumtim/gjuetia-ilegale-po-rrezikon-faunen-e-kosoves/>

23. See: [https://www.ammk-rks.net/repository/docs/Raporti\\_i\\_Natyres\\_2010-2014\\_web.pdf](https://www.ammk-rks.net/repository/docs/Raporti_i_Natyres_2010-2014_web.pdf)



### ◆ Wildfires:

The most endangered plants are forest pines (*Pinetum heldreichii*), which have incurred significant damages from wildfires (in 2000, 2007 and 2012).<sup>24</sup> Pine forests in the areas of Oshllak, Koxha Ballkan and Pashallare, with an area of 10%, were damaged by wildfires in 2000 and the rapid development of pests that emerged in huge numbers after the fires (*Ips. Sp.* and *Blatophagus sp.*). A total of 4.5% of the area has been completely destroyed.<sup>25</sup>



*Forest pine community (Pinetum heldreichii)*<sup>26</sup>

In 2012, on Mount Koritnik in the Prizren region, there were low-intensity fires across 1.5 hectares of the park, which were eventually brought under control and extinguished by Forestry officials. The occurrence of wildfires intensified especially during the month of August, more specifically on August 22, 2012. The fires were localized and brought under control on August 28, 2012, but large areas of high quality of forests with coniferous crops were affected.<sup>27</sup>

According to Bajram Kafexholli, director of the DANP, “the fire of 2012 was deliberate, as it was the year the Sharri National Park was expanded.” Kafexholli believes that starting the fire was an attempt to keep logs from the area available for use in the construction industry. “When the park was expanded, it stopped the legal use of the forest logging for the industry, which resulted with the fire as a form of protest.”<sup>28</sup>

24. See: [https://www.ammk-rks.net/repository/docs/Raporti\\_i\\_Natyres\\_2010-2014\\_web.pdf](https://www.ammk-rks.net/repository/docs/Raporti_i_Natyres_2010-2014_web.pdf)

25. See: [https://www.ammk-rks.net/repository/docs/Raporti\\_i\\_Natyres\\_2010-2014\\_web.pdf](https://www.ammk-rks.net/repository/docs/Raporti_i_Natyres_2010-2014_web.pdf)

26. See: [https://www.ammk-rks.net/repository/docs/Raporti\\_i\\_Natyres\\_2010-2014\\_web.pdf](https://www.ammk-rks.net/repository/docs/Raporti_i_Natyres_2010-2014_web.pdf)

27. See: [https://www.ammk-rks.net/repository/docs/Raporti\\_i\\_Natyres\\_2010-2014\\_web.pdf](https://www.ammk-rks.net/repository/docs/Raporti_i_Natyres_2010-2014_web.pdf)

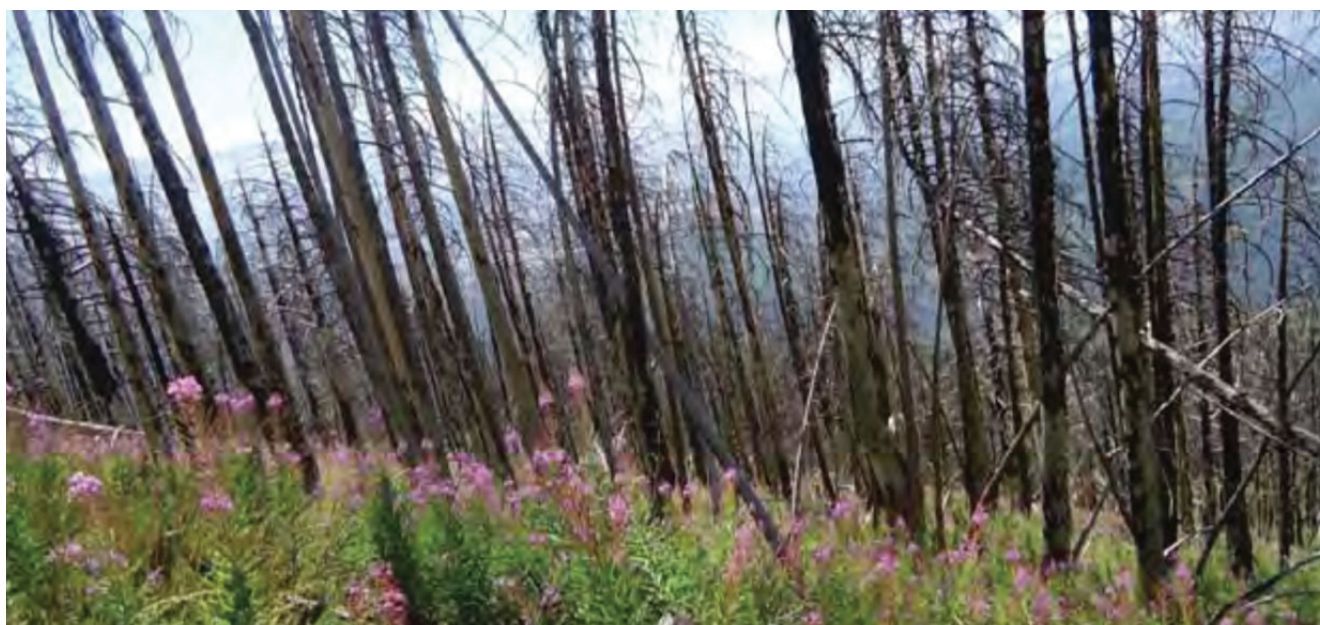
28. Interview with the Director of the Directorate for the Administration of the Sharri National Park on 06.10.2020



*Fire in the Sharri National Park between 22.08.2020-28.08.2020 and its consequences<sup>29</sup>*

The 2015-2017 Environmental Report provides a particularly challenging situation with pine forests (*Pinetum heldreichii*) in the areas of Koritnik and Pisha e Madhe, as a result of the fires of 2000, 2007, 2012 and 2015, and the emergence of pests such as the bark beetle (*Scolytidae*). About 1,000 hectares of forests on Mount Koritnik and about 100 hectares of pine forests in the area of Pisha e Madhe were damaged.<sup>30</sup>

The fires were mainly caused by humans discarding unextinguished cigarette butts and holding picnics in which fires were lit to help prepare the food. Efforts to clean the area burned in the fires of 2012 have been made over the last two years (2018-2020), including the removal of burnt trees.<sup>31</sup>



*Forest damages from fires in pine forests in Koritnik<sup>32</sup>*

29. See: [https://www.ammk-rks.net/repository/docs/Raporti\\_i\\_Natyres\\_2010-2014\\_web.pdf](https://www.ammk-rks.net/repository/docs/Raporti_i_Natyres_2010-2014_web.pdf)

30. See: [https://www.ammk-rks.net/repository/docs/Raporti\\_per\\_gjendjen\\_e\\_natyres\\_2015-2017.pdf](https://www.ammk-rks.net/repository/docs/Raporti_per_gjendjen_e_natyres_2015-2017.pdf)

31. Interview with the Director of the Directorate for the Administration of the Sharri National Park on 06.10.2020

32. See: [https://www.ammk-rks.net/repository/docs/Raporti\\_i\\_Natyres\\_2010-2014\\_web.pdf](https://www.ammk-rks.net/repository/docs/Raporti_i_Natyres_2010-2014_web.pdf)



Over the years, fires have been more prevalent in pasture areas with grass surfaces, and these areas appear to be more flammable.

### *A list of fires in the Sharri National Park between 2017 and 2020*

•**In 2017**, there were six fires in the mountainous areas of Koritnik, Kabashi Mountain, Oshlak, Konjushka, Kobolicë and Vërtop. Damage was caused to herbaceous vegetation across an area of around three hectares.

•**In 2018**, there were five fires in the mountainous areas of Delloci Mountain, Kobilica, Konjushka, Koxha Ballkan and Gotovusha. Damage extended to herbaceous vegetation across an area of about two hectares.

•**In 2019**, there were eight bigger fires; five fires in the mountainous areas of Brod and Firaja (in the municipality of Shterpce) and three fires in the regions surrounding the villages of Brod, Restelica and Krusheve (in Dragash municipality). Damage extended to herbaceous vegetation (mainly pastures) across an area of about 100 hectares.

•**In 2020**, there were no major fires, with the COVID-19 pandemic being a major contributing factor to the reduction. However, one notable fire occurred in the region of the village of Manasterica, causing damage to around two hectares of grasslands and shrubs.<sup>33</sup>

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33. Data sent by the Directorate for the Administration of the “Sharri” National Park



## ◆ Illegal logging

According to an MESP cover the period 2010-2014, the state of natural resources in the Sharri National Park was unsustainable, due to the adverse effects of biotic factors (humans, insects, diseases) and abiotic factors (fires, natural disasters: wind, snow, etc.).<sup>34</sup> Abiotic factors can lead to impacts including a reduction in rainfall and higher temperatures, but the factor with the most adverse impact is the anthropogenic factor, also known as the human factor.

Forest vegetation is most at risk, as it covers about 35% (18,298 hectares) of the area of the Sharri National Park. Beech forests are more widespread in the Sharri National Park, predominantly the Fagetum Montanum and Fagetum Subalpinum species,<sup>35</sup> which are subjected to the risk of illegal logging.

This negative phenomenon is particularly prevalent in the region close to the villages of Delloc and Maçiteve in the municipality of Suhareka, as well as in Manastirica and Koritnik 1 in the municipality of Prizren, and in various regions in the municipality of Shterpce that have remained outside the governance of the MESP and the DANP.<sup>36</sup>



*Illegal logging of forests in National Park” Sharri”<sup>37</sup>*

The 2015-2017 report by the MESP<sup>38</sup> also indicates a wide spread of this activity in other municipalities.

34. See: [https://www.ammk-rks.net/repository/docs/Raporti\\_per\\_gjendjen\\_e\\_natyres\\_2015-2017.pdf](https://www.ammk-rks.net/repository/docs/Raporti_per_gjendjen_e_natyres_2015-2017.pdf), page 45.

35. See: [https://www.ammk-rks.net/repository/docs/Raporti\\_i\\_Natyres\\_2010-2014\\_web.pdf](https://www.ammk-rks.net/repository/docs/Raporti_i_Natyres_2010-2014_web.pdf)

36. See: [https://www.ammk-rks.net/repository/docs/Raporti\\_i\\_Natyres\\_2010-2014\\_web.pdf](https://www.ammk-rks.net/repository/docs/Raporti_i_Natyres_2010-2014_web.pdf)

37. See: [https://www.ammk-rks.net/repository/docs/Raporti\\_i\\_Natyres\\_2010-2014\\_web.pdf](https://www.ammk-rks.net/repository/docs/Raporti_i_Natyres_2010-2014_web.pdf)

38. See: [https://www.ammk-rks.net/repository/docs/Raporti\\_per\\_gjendjen\\_e\\_natyres\\_2015-2017.pdf](https://www.ammk-rks.net/repository/docs/Raporti_per_gjendjen_e_natyres_2015-2017.pdf)



## SHARRI NATIONAL PARK: THE TARGET OF CRIME

Damages to forests from illegal logging have been more pronounced in the regions of Brod and Firaje in the municipality of Shterpce and in the Jasika region of Luboten in the municipality of Kaçanik.

In the municipalities of Kaçanik and Shterpce activities of illegal logging date back to much earlier. A 2011-2012 report by the MESP states that there was considerable damage to beech forests in the territory of the National Park located in the municipalities of Shterpce and Kaçanik.<sup>39</sup> This is in part due to a lack of managerial oversight by the DANP and MESP in the municipality of Shterpce, which used to be overseen by Serbian parallel institutions.<sup>40</sup> In 2013, these Serbian parallel institutions were removed and the Sharri National Park is now managed by the institutions of the Republic of Kosovo in the territory of Shterpce.<sup>41</sup>

Regions with the most pronounced problems with illegal logging are the region of Jasika in the Kacanik municipality, and areas of Shterpce, including Brod and Firajë. Between 2016-2020, a large number of lawsuits were filed at the Basic Courts of Prizren and Ferizaj for illegal logging and forest theft in the protected area of the Sharri National Park. These lawsuits were filed by the DANP and legal officers at the Kosovo Environmental Protection Agency in the municipality where the illegal loggers were caught.

- In **2016-2017**, at least **12,014.12 m<sup>3</sup>** of forests were damaged as a result of illegal logging, mainly in the municipalities of Kaçanik and Shterpce, where the DANP had no forest guards employed. **111 criminal lawsuits** were filed at the Basic Courts of Prizren and Ferizaj in 2017, involving **297.12 m<sup>3</sup>** of timber.
- In **2018**, **4,436.03 m<sup>3</sup>** of forest damages were recorded in the Sharri National Park as a result of illegal logging, with the damage most emphasized in the regions of Brod and Firaje in the municipality of Shterpce, and in the region of Jasika in the municipality of Kaçanik. **188 lawsuits** were filed at the Basic Courts of Prizren and Ferizaj for forest theft in the protected area of the Sharri National Park, involving a total of **643.85 m<sup>3</sup>** of timber.
- In **2019**, **2,500 m<sup>3</sup>** of forest damaged by illegal logging were recorded in the Sharri National Park. Illegal logging was most notable in the regions of Brod and Firaje in the municipality of Shterpce, and in the Jasika region of Luboten in the municipality of Kaçanik. **162 lawsuits** were filed for forest theft in the protected area of the Sharri National Park involving a total of **347.02 m<sup>3</sup>** of timber.
- In **2020**, to date, over **1000 m<sup>3</sup>** of timber damage has been registered. The final report on forest damages will be published by the end of November.<sup>42</sup>

KOSID reached out to officials involved in forest protection who are convinced that there is an organized crime network operating in part of Kaçanik focusing on illegal logging. The officials state that a group of people follow the guards and monitor the police, and that their identities and names have been submitted to the regional police in Kaçanik, which has issued dozens of court summonses.<sup>43</sup>

39. See: [https://www.ammk-rks.net/repository/docs/Raporti\\_Gjendja\\_e\\_Mjedisit\\_Web\\_Shqip.pdf](https://www.ammk-rks.net/repository/docs/Raporti_Gjendja_e_Mjedisit_Web_Shqip.pdf)

40. See: [https://www.ammk-rks.net/repository/docs/Raporti\\_Gjendja\\_e\\_Mjedisit\\_Web\\_Shqip.pdf](https://www.ammk-rks.net/repository/docs/Raporti_Gjendja_e_Mjedisit_Web_Shqip.pdf)

41. Interview with the Director of the Administration of the Sharri National Park Bajram Kafexholli on 06.10.2020

42. Data sent by the Directorate for the Administration of the Sharri National Park

43. Interview with an employee of the Directorate for the Administration of the Sharri National Park on 06.10.2020





*Confiscated timber that has been located in the yard of the Directorate for the Administration of the Sharri National Park for several years <sup>44</sup>*



*Confiscated vehicles that has been located in the yard of the Directorate for the Administration of the Sharri National Park for several years <sup>45</sup>*

The process is such that if someone is caught with wood resulting from illegal logging, his/her vehicle and the amount of timber logged will be immediately confiscated. The DANP will then file a criminal report and send it to KEPA, who lodge the report with the relevant court.

According to Bajram Kafexholli, most of the perpetrators are punished, but those with political connections can escape justice.<sup>46</sup> The main cause of illegal logging is the difficult socio-economic situation of the rural population, which uses beech wood as their main source of heating. This is coupled with a failure to successfully deal with the lawsuits filed by the DANP and KEPA at the relevant courts.<sup>47</sup>

Confiscated timber, which was stored at the DANP, was donated to families in need following a decision from the Head of the Environmental Protection Agency, whereas owners of confiscated vehicles must obtain permission from the court in order to reclaim them.

44. Photos taken from the yard of the Directorate of Administration of the Sharri National Park

45. Photos taken from the yard of the Directorate of Administration of the Sharri National Park

46. Interview with the Director of the Administration of the Sharri National Park Bajram Kafexholli on 06.10.2020

47. See: [https://www.ammk-rks.net/repository/docs/Raporti\\_i\\_Natyres\\_2010-2014\\_web.pdf](https://www.ammk-rks.net/repository/docs/Raporti_i_Natyres_2010-2014_web.pdf), page 47.



Logging in the Sharri National Park is prohibited by the law on Nature Protection. “Damages to nature as a result of illegal logging are severe, and lead to Sharri National Park losing its value as a nature reserve, and the area will lose the protected zone status and can be used for different purposes.”<sup>48</sup>

Logging is only allowed for sanitary cleaning, with the timber mass created intended to meet the needs of the local community for firewood. This has led to a lower demand for firewood in the rural areas of the Sharri National Park, the prevention of illegal logging, and better relations between the DANP and the local community, which is a group of special importance for the Sharri National Park.

Sanitary cleaning is done in forests when the trees are diseased, rotten, distorted or preventing access to roads, and the DANP issues permits for sanitary logging to the residential households in the Sharri National Park. A household is permitted 12 cubic meters of timber. The benefits of the sanitation process are comprehensive, in ecological, social and economic terms.<sup>49</sup>

### *Sanitary cleaning of forests, between 2017-2020*

- **In 2017**, sanitary cleaning of damaged and infected wood totalled 4,444.89 m<sup>3</sup>, mostly beech wood (2,998.09 m<sup>3</sup> in public forests and 1,444.80 m<sup>3</sup> in private forests). Revenues of €47,371.78 were recouped from the sale of the timber resulting from sanitary cleaning (€45,201.59 from public forests and €2,170.20 from private forests).
- **In 2018**, sanitary cleaning of damaged and infected wood totalled 5,638.53 m<sup>3</sup>, mostly beech wood (4,608.43 m<sup>3</sup> in public forests and 1,030.10 m<sup>3</sup> in private forests). Revenues of €58,110.19 were recouped from the sale of the timber from sanitary cleaning (€56,565.04 from public forests and €1,545.15 from private forests).
- **In 2019**, sanitary cleaning of damaged and infected wood totalled 6,688.10 m<sup>3</sup>, mostly beech wood (5,024.04 m<sup>3</sup> in public forests and 1,688.10 m<sup>3</sup> in private forests). The timber mass from sanitary cleaning was dedicated to meeting the needs for firewood of the local community. Revenues of €59,181.54 were recouped from the sale of the timber resulting from sanitary cleaning (€56,685.45 from public forests and €2,496.09 from private forests).
- **In 2020**, sanitary cleaning started in mid-August and, according to the plan, should be completed by November 15, 2020. It is estimated that the amount of timber in this year’s sanitary cleaning will be close to that from 2019.

The timber from sanitary cleaning is dedicated to meeting the firewood needs of the local community.<sup>50</sup>

48. Interview with Behxhet Mustafa, Professor at the Faculty of Mathematical and Natural Sciences, University of Prishtina, Department of Ecology

49. See: [https://www.ammk-rks.net/repository/docs/Raporti\\_per\\_gjendjen\\_e\\_natyres\\_2015-2017.pdf](https://www.ammk-rks.net/repository/docs/Raporti_per_gjendjen_e_natyres_2015-2017.pdf)

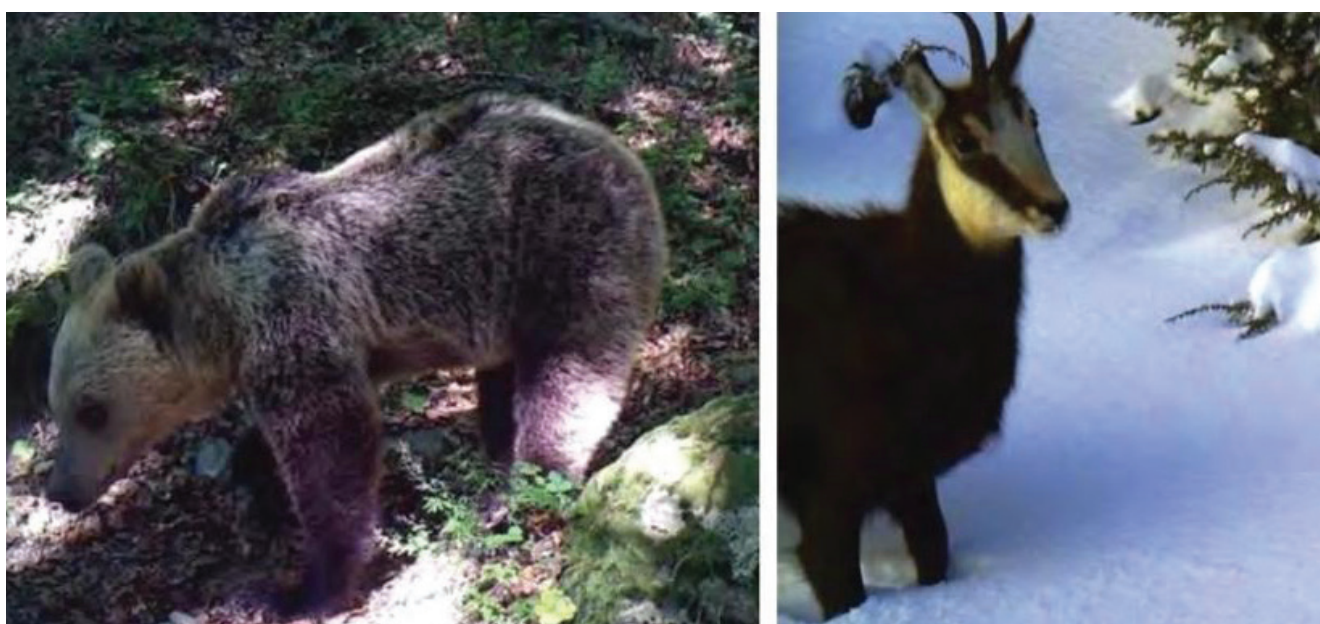
50. Data sent by the Directorate for the Administration of the “Sharri” National Park



## ◆ Hunting and poaching

The fauna in the Sharri National Park is very diverse, with numerous species of wildlife including species that are endangered at the European level. This group includes large mammals such as the brown bear, wolves, wildcats, and the golden jackal. This is particularly significant due to the presence of similar ecosystems and populations in the neighboring countries of Albania and North Macedonia.<sup>51</sup>

Species which constitute the primary prey of larger carnivores are also important, particularly deer, which have unfortunately become a target for hunters and poachers. A 2010-2014 MESP report on the state of nature indicates that hunting and poaching puts deer and wild goats most at risk, while the brown bear and wolves have seen a positive development in this regard.<sup>52</sup>



*Brown bears and wild goats in NP “Sharri”<sup>53</sup>*

These species will continue to be endangered in the years to follow according to the MESP’s report for 2015-17, which states: “The condition of the fauna is relatively good, but a permanent danger for some species of animals (roe and wild goats) is posed by illegal hunting which appears from time to time (especially at the weekend) in some areas of the Sharri National Park, including: Shutman, Oshlak, Bistra, Koxha Ballkani, Rusenica and Jazhince Lake.”<sup>54</sup>

“The destination of animals killed by illegal hunting are restaurants in the area of Zhupa and beyond, so stopping the sale of banned meat, requires more serious involvement by relevant municipal and central inspectorates,” the report adds.<sup>55</sup>

The risk of illegal hunting does not come only from inhabitants of the Republic of Kosovo, as there have been cases when residents of countries like North Macedonia or Albania cross into the territory of Kosovo and illegally hunt fauna, under the pretext that their cattle entered the pastures on the territory of

51. See: [https://www.ammk-rks.net/repository/docs/Raporti\\_per\\_gjendjen\\_e\\_natyres\\_2015-2017.pdf](https://www.ammk-rks.net/repository/docs/Raporti_per_gjendjen_e_natyres_2015-2017.pdf)

52. See: [https://www.ammk-rks.net/repository/docs/Raporti\\_i\\_Natyres\\_2010-2014\\_web.pdf](https://www.ammk-rks.net/repository/docs/Raporti_i_Natyres_2010-2014_web.pdf)

53. See: [https://www.ammk-rks.net/repository/docs/Raporti\\_per\\_gjendjen\\_e\\_natyres\\_2015-2017.pdf](https://www.ammk-rks.net/repository/docs/Raporti_per_gjendjen_e_natyres_2015-2017.pdf)

54. See: [https://www.ammk-rks.net/repository/docs/Raporti\\_per\\_gjendjen\\_e\\_natyres\\_2015-2017.pdf](https://www.ammk-rks.net/repository/docs/Raporti_per_gjendjen_e_natyres_2015-2017.pdf), page 55

55. See: [https://www.ammk-rks.net/repository/docs/Raporti\\_per\\_gjendjen\\_e\\_natyres\\_2015-2017.pdf](https://www.ammk-rks.net/repository/docs/Raporti_per_gjendjen_e_natyres_2015-2017.pdf)



the Sharri National Park.<sup>56</sup> This is illegal, because hunting is not allowed 500 meters outside the border of the Republic of Kosovo.



*Roe deer, an endangered species according to the Red Book of Fauna<sup>57</sup>*

“Between 2017 and 2020, illegal hunting occurred occasionally in some mountainous areas such as: Koritnik, Shutman Oshlak, Koxha Ballkani, Jazhince Lake, Konjushka etc,” Kafexholli from the DANP states. “A special problem in the municipality of Dragash is illegal hunters from Albania, who operate on the border area from Koritnik to Rudoka. Occasionally, hunters from North Macedonia also illegally enter the mountainous areas of Konjushka and Dupnica. The most endangered animals from illegal hunting are wild goats and deer, but there was a drop in illegal hunting from 2018-2020.”<sup>58</sup>

According to the DANP, residents of different parts of the Sharri National Park are more aware and are reporting the sound of gunshots to the police, in which case the Directorate is notified.

Hunting is largely prohibited in the Sharri National Park, with hunters only permitted to hunt during hunting season, which is determined by the MAFRD. “According to the Ministry, only the Minister of Agriculture may open and set the duration of the hunting season according to the Law, through a decision, not any other body or institution.”<sup>59</sup>

The opening of the hunting season depends on the MAFRD calendar and the information gathered. One of the main issues is ensuring that hunting is prohibited during mating season, or when animals are likely to be pregnant. Hunters’ associations obtain permits and each association has their own area in which hunting is allowed, all of which fall outside the territory of the Sharri National Park.

56. Interview with the Director of the Directorate for the Administration of the Sharri National Park on 06.10.2020

57. Look: [https://www.ammk-rks.net/repository/docs/v2Red\\_Book\\_-\\_6\\_Shtator\\_1\\_\(1\).pdf](https://www.ammk-rks.net/repository/docs/v2Red_Book_-_6_Shtator_1_(1).pdf), page 82

58. Interview with the Director of the Directorate for the Administration of the Sharri National Park on 06.10.2020

59. See: <https://www.koha.net/arberi/242935/gjuetia-ilegale-rrezikon-zhdukjen-e-shume-kafsheve/>



One of the oldest hunting associations in Prizren is the Sharri Hunters' Association. "Our association has the people in the field in Prizren that monitor the situation on that side in terms of illegal hunting," Sedat Krasniqi, secretary of the association, said. "The total number of guards monitoring illegal hunting from the association is 52, while the association also has trap cameras for monitoring animals in the area. Our guards cooperate closely with the guards from the DANP."<sup>60</sup>

According to Fatos Lajci from the ERA Group NGO: "Illegal hunting taking place in the Sharri National Park has various consequences, including harming wildlife habitats, as the animals are disturbed by the gunshots of the hunters. Many hunters use their hunting permits obtained by joining a hunting association to acquire a rifle and then use it to hunt in prohibited areas, including the National Park."<sup>61</sup>

In 2020, hunting season opened on November 1st. However, in the previous year, hunting season was cancelled by a decision of Minister Besian Mustafa, on the grounds that there was a reduction in the number of wild animals.<sup>62</sup>

According to a DANP employee, hunting is practiced in two ways, using a rifle and using a hunting dog, both of which are equally harmful. In the case of hunting with a gun, the hunter has three bullets with which to hunt, while in the case of hunting with a dog, the hunter lets the dogs approach the prey close making it easier to ambush. There have also been cases where senior Kosovo officials have practiced illegal hunting in this park, near Suhareka and Prizren.<sup>63</sup>

The DANP operates with two heads of sections, field staff, administrative and professional staff. There are 18 officers, while every year, 10-12 security guards are hired based on a six-month service contract. This is due to the insufficient budget allocated to this directorate which makes it impossible to hire guards for longer periods.

The management plan of the Sharri National Park envisages that the number of staff at the DANP should reach 50 employees, while currently there are only 28-30. One of the challenges faced is the lack of a Fauna Officer, as the former officer retired and the relevant institutions claim that there is no budget to hire another person for this position. This hinders the battle against illegal hunting, as there is no one to deal with this problem directly.

After the expiration of the guards' service contract, a vacancy is published for two months. Applicants have to take two tests, oral and written, before being admitted. Finding satisfactory applicants is a big challenge, especially in the regions of Kaçanik and Shterpece, where residents have to be asked to apply.

The lack of interest can be attributed to a number of reasons, including the feeling of insecurity on the ground and the risk of experiencing problems with the perpetrators of criminal acts. Guards in Prizren have regular contracts as the region has been part of the Sharri National Park since 1986, while guards covering other regions have special service contracts.

In 2007 and 2008, there were problems in the Dragash area when employees of Serbian parallel structures did not agree to enter the new management structures of the park when the park was expanded. However, in 2013, these parallel structures were removed and since then, territory of the park in Dragash has been managed by the DANP.

60. Interview with Sedat Krasniqi from the "Sharri" Hunters Association of Prizren on 16.11.2020

61. Interview with Fatos Lajqi from ERA NGO on 07.11.2020

62. See: <https://www.koha.net/arberi/242935/gjuetia-ilegale-rrezikon-zhdukjen-e-shume-kafsheve/>

63. Interview with a worker of the Directorate for the Administration of the "Sharri" National Park



## SHARRI NATIONAL PARK: THE TARGET OF CRIME

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Territory of the park in Kaçanik, Shterpce and Dragash, however, is not covered by DANP guards, but by security guards with special service contracts. The distribution of guards is done depending on the size of the ground to cover, as, for example, the park covers a larger territory in Prizren, necessitating more guards in that region.

There are forested areas in the regions of Prizren, Suhareka, Shterpce and Kaçanik, while the area of Dragash is covered mainly by pastures. The regions of Kaçanik, Shterpce, Dragash, Suhareka have two DANP guards each while Prizren has six guards, meaning 60-70% of the territory is uncovered by security guards.



## CONCLUSION

### A. Natural aspects

#### ● **Illegal logging:**

According to the findings and interviews, one of the issues faced by the DANP is the small budget it is allocated, which results in a reduction in the number of guards with regular contracts, as well as a lack of staff, falling short of the number set in the Management Plan of the Sharri National Park.

Another serious issue is posed by organized crime groups involved in illegal logging in the Park. Continued logging will risk certain areas losing the values for which they were assigned as “protected zones”, and, if a zone loses these values and becomes degraded, it will be removed from the list of zones protected by law in Kosovo.

The failure to take into consideration ongoing judicial processes when recruiting staff indicates the fragility of the judicial system and law enforcement in Kosovo – people who degrade nature must be sentenced, which is currently not the case. On the contrary, many are even employed by the state, and incentivized to generate income and invest in equipment that can further damage the environment.

#### ● **Hunting and poaching:**

Kosovo is yet to produce comprehensive research on fauna in the Park, and the lack of a fauna officer at the DANP limits the availability of high quality information on the Park’s fauna, including population levels of species in specific locations.

Meanwhile, hunting and poaching in the Sharri National Park may lead to a significant decrease in the population of an animal species in the habitat, and even risk its extinction. The given excuse that hunting reduces the number of dangerous wild animals is a weak argument – humans are encroaching on a foreign territory, a space which is a habitat for another species.

Hunting with dogs is also deeply disruptive, as animals are forced to leave their natural habitats and enter others, disrupting the ecological balance of the park. Hunting, perhaps more than any other issue, throws into sharp relief the damage caused by the “anthropogenic effect” on the natural world.

However, on a positive note, the residents of the Sharri National Park area are now more aware of the dangers of hunting and promptly call the police whenever they hear gunshots.



### ● Wildfires:

Some habitats can no longer be revitalised naturally as the nutritional values of the soil have been lost, including in Koritnik, which was burned years ago. However, human intervention can mitigate the losses, if not restore them completely, and other fires caused by picnics or hikes by residents are minor and manageable.

However, with the lack of staff, these fires can escalate into larger ones, as many areas are not patrolled by guards, and the season in which fires are most prevalent is the summer, when the Park also receives the highest number of visitors.

### B. Legal aspect

The legal framework for the protection of Sharri National Park and the prohibition of illegal acts, including deforestation, hunting and poaching, and wildfires consists of a number of legal acts:

1. **Law No. 04 / L - 087 on the Sharri National Park**, in addition to having defined protected areas within the national park on three levels, also affords special protection to the Buffer Zone which includes an area of fifty (50) meters from the border of the Sharri National Park which serves to prevent adverse impacts in the National Park.<sup>64</sup>
2. **Law No. 03 / L-233 of Nature Protection** stipulates that nature degradation includes all human activities that change natural processes to such an extent that the natural balance is disturbed, or the values of nature are destroyed.<sup>65</sup>

According to this law, the **protected nature value**, as determined and defined under this Law and registered in the Register of protected nature values, includes: strict nature reserves, national parks, special areas, nature parks, nature monuments, protection landscapes and monuments of park architecture - protected plant species, mushrooms and animals including samples of carrion of protected wild species based on this Law and international legal acts, their parts and derivatives as well as minerals, fossils, and protected exfoliations.<sup>66</sup>

According to national legislation, the territory of the Sharri National Park is **an important ecological area - IEA** (territory which significantly contributes to the conservation of biological diversity in the Republic of Kosovo)<sup>67</sup>, as well as a **Special Preserved Zone - SPZ** (an area important to the Community and declared as such by legal, administrative and/or contractual acts, where the necessary conservation measures have been implemented for maintenance, or restoration to a favorable conservation status of the natural habitat and/or population of the species for which the area has been declared).<sup>68</sup>

Consequently, the protected nature values according to this law are: Protected areas, including the Sharri National Park, where all activities associated with the economic exploitation of natural

64. Article 3, Paragraph 1, Sub-paragraph 4 of the Law No. 04/L - 087 on the National Par;

65. Article 7, Paragraph 1, Sub-paragraph 2 of the Law No. 03/L-233 on Nature Protection;

66. Article 7, Paragraph 1, Sub-paragraph 57 of the Law No. 03/L-233 on Nature Protection;

67. Article 7, Paragraph 1, Sub-paragraph 60 of the Law No. 03/L-233 on Nature Protection;

68. Article 7, Sub-paragraph 1.63 of the Law No. 03/L-233 on Nature Protection;





resources<sup>69</sup> are prohibited.<sup>70</sup> In this regard, the use of natural resources in a way that leads to the **impoverishment of the natural world of plants, fungi and animals is prohibited**<sup>71</sup> except for works and activities which do not endanger natural resources.<sup>72</sup> Disturbing illegal activities taking place in the park are prohibited by law, and such activities (illegal logging/deforestation, hunting and poaching, fires) are punishable under the applicable law.

- ▶ Regarding **FIRES**: In the strict reservation, the **national park, the special area**, the nature park, the protected landscape and park architecture sites, **lighting fires** outside settlements and/or places that are marked and designated for such purpose is prohibited.<sup>73</sup>
  - ▶ Regarding **HUNTING AND POACHING**: Any disturbance to wild animals, including capture, harm, or reduction of the population of their species, as well as killing, elimination, destruction or damage to their habitats and changes to their living conditions to the extent that threatens their existence is prohibited without justified reasons.<sup>74</sup> In addition any capture or killing of animals falling in the category of protected wild species is prohibited, unless the hunting is done for the purpose of processing, trade or another purpose, in which case a written permit is required to be issued from the Ministry, or with the consent of the owner of the holder of the rights of the natural goods.<sup>75</sup>
  - ▶ Regarding the **DEGRADATION OF FORESTS THROUGH DEFORESTATION**: Collection of plants, fungi and their parts which belong to the category of protected wild species is prohibited, except for the purpose of processing, trade and other purposes, with the permission of the Ministry.<sup>76</sup>
3. **Law No. 03/L-025 on Environmental Protection** determines that activities which threaten environmental capacity, natural balance, biodiversity, hydrographic, geomorphologic, geological, cultural and landscape values or which in any way degrade the quality and properties of the natural good shall not be allowed within protected natural values.<sup>77</sup>
4. **Law No. 2003/3 on Forests in Kosovo, Law No. 2004/29 amending the Law No. 2003/3 on Forests in Kosovo, and Law No. 03/L-153 amending the Law No. 2003/3 on Kosovo Forests** stipulates that any unauthorized person is prohibited from carrying logging tools in public forests. No person may log wood in public forests unless the person has a valid license issued under these laws. The license to log wood in a public forest is only valid if the logging is in accordance with the valid operational management plan covering that forest. For this purpose, the Forest Agency issues licenses and marks trees in public forests in accordance with this article.<sup>78</sup>

All illegal activities such as arson, poaching, as well as degradation of forests through deforestation are punishable under the applicable national legislation and are criminal offenses against the environment, animals, plants and cultural objects under **Criminal Code No. 06/L-074 of the Republic of Kosovo**.<sup>79</sup>

69. Article 11, Paragraph 4, of the Law No. 03/L-233 on Nature Protection;

70. Article 8, Paragraph 1, of the Law No. 03/L-233 on Nature Protection;

71. Article 123, Paragraph 2, Sub-paragraph 3 of the Law No. 03/L-233 on Nature Protection;

72. Article 11, Paragraph 3, of the Law No. 03/L-233 on Nature Protection;

73. Article 75, Paragraph 1, Sub-paragraph 5 of the Law No. 03/L-233 on Nature Protection;

74. Article 86, Paragraph 2 of the Law No. 03/L-233 on Nature Protection;

75. Article 90 of the Law No. 03/L-233 on Nature Protection;

76. Article 90, Paragraph 1. of the Law No. 03/L-233 on Nature Protection;

77. Article 12, Paragraph 2 of Law No. 03/L-025 on Environmental Protection.

78. Article 20, para 1,2,3 & 4 of the Law No. 2003/3 on Forests in Kosovo.

79. See: <https://md.rks-gov.net/desk/inc/media/6A2D4377-6AE1-4530-909F-3FB2680CD1EC.pdf>



## SHARRI NATIONAL PARK: THE TARGET OF CRIME

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These activities constitute criminal offenses under **Article 338 - Pollution, degradation or destruction of the environment**, **Article 348 - Destruction of forests**, **Article 349 - Theft of forests**, **Article 350 - Poaching (Illegal hunting)**. Depending on the level of damages caused, the perpetrators of these offenses are criminal offenders, punishable with imprisonment, and/or minor offenders (fines).



