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**MINISTER OF THE ENVIRONMENT
REPUBLIC OF POLAND**

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**Mr. Harald Egerer
Head
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Secretariat of the Carpathian Convention**

In reply to the notification No. 2016-4 – *Invitation to consider possible finalization of the Carpathian Red List of Forest Habitats and the Red List of Vascular Plants of the Carpathians* I would like to thank you and all experts involved in the development of those documents for extensive work that has been put into preparing this proposal. At the same time let me inform you about Polish concerns regarding both lists.

The analysis of the Red List of Forest Habitats from the perspective of actual threats for particular types of habitats is difficult to conduct, as the list is based on EUNIS habitats classification that is very inconsistent and differentiated as to the scope of units. The existing level of identification of Carpathian forest habitats enables us to choose, as the basis for the Red List, other classification units that are defined in a more precise manner. It would even be possible to reach for phytosociological approach that operates with biocoenotic units that are very precisely defined.

In this form the list does not seem to be very useful for the nature conservation on the whole area of Carpathians. It does not include some forest biotopes that are rare and at the same time – very important from the point of view of protection of habitats, e.g. alder swamp forests of lower forest zone and some other, that do not fit into any listed category.

In addition the publication “*Carpathian Red List of Forest Habitats and Species. Carpathian List of Invasive Alien Species (draft)*” by The State Nature Conservancy of the Slovak Republic, 2014, Table 3, page 42 presents short description of habitats, including conversion between EUNIS habitat classification and other classification. There are differences in the scopes of different classifications in relation to the syntaxons singled out in the phytosociological classification and Polish experts have noticed some inaccuracies. As this publication is a source document, it is essential for the

interpretation of the list. Therefore it should be completed and the elements that are subject to comments mentioned below should be clarified.

In particular table 3 does not indicate mesotrophic firs (*Galio – Abietenion*) as the Natura 2000 Habitat 9110, although according to Polish experts this should be the case. There is also no information provided whether the association *Abieti – Piceetum* is included in the scope of any of EUNIS habitats. Additionally, sycamores from the alliance *Tilio – Acerenion* belong to the Natura 2000 Habitat 9180* that is listed in relation to thermophilic forests with silver lime, although this alliance is not described and not indicated on maps. It can also be presumed that since the habitats mentioned above have not been included in the table, they are not part of individual types of habitats based on EUNIS classification.

In different Parties to the Carpathian Convention various types of natural habitats are presented in different ways, which leads to some misunderstandings - certain habitat can be considered as not occurring in a Party only because it is named differently or is classified differently. Therefore it is of utmost importance to ensure that this sort of classification is consistent for all the countries concerned.

The above comments lead to the conclusion that the whole proposal of the Red List of Forest Habitats requires deeper analysis and additional work before being recognized as ready for adoption.

Also the draft Red List of Vascular Plants of the Carpathians needs to be subject to further work before submitting it for adoption.

There are some species missing in the list that should have been included in it because of scarceness, danger to the habitats and because of their local endemic character. *Cochlearia tatrae*, *Cochlearia pyreneica*, some species of *Alchemilla* are the examples of such cases.

Some doubts are arising from the fact that the list relating to this particular mountainous area includes archaeophytical species of weed, especially in the light of lack of some rare and endangered native vascular plants. Irrespective of that, some information is slightly misleading, e.g. category “RE” means species that are regionally extinct – it is a misunderstanding if “regionally” is meant as Carpathian as the whole, because in that sense all other categories are also related to the Carpathian region. In addition, this group includes both species that are extinct in their whole areal extent and not just in Carpathians, e.g. *Camelina alyssum* – both subspecies, and those that are extinct only in the Carpathian region, e.g. *Dryopteris villari*. From the point of view of nature conservation it is at the same time important, whether there is a population of the species that has survived ex situ or not. In cases like this we usually differentiate (for practical reasons) species that are completely extinct from those that are extinct at natural sites but their populations from those sites have been preserved ex situ and as a result they can be reintroduced any time (e.g. *Dryopteris villari* that has been mentioned above).

Including in the list species that are described by “marginal occurrence in the assessed territory” also raises several doubts. This group requires clear definition that cannot be found in the proposal at the moment.

In the opinion of Polish experts some species should not have been included into the list at all, and they might have been put there as a result of not sufficient insight as to their occurrence. *Glyceria declinata* for example is a species that is quite common or at least – not rare and additionally it spreads easily in anthropogenic habitats. *Dryopteris boreri* is an example of species that is not endangered and that has been placed in one group (VU) with *Dryopteris cristata* that in fact is rare and endangered in Carpathians. The list includes – as “marginal” - *Melilotus latissimus*, although there are no clear reasons for that, and *Camelina sativa ssp. sativa* under category “Regionally Extinct” although this

species occurs in the area covered by the list. Another problematic example is *Poa nemoralis* ssp. *Carpathica* – if it is to be considered endangered species, the group should include also some others. On the other hand there are some species that are rare, with relatively small populations and that are certainly more endangered, like e.g. *Pulsatilla vernalis* and *Saussurea pygmaea*. There are more examples like those two. In this context it is also difficult to understand why *Ligularia sibirica*, being a priority species in Europe, has not been included in the list.

Finally it is rather not the best solution to organize this list in accordance with EuroMed terminology, because e.g. it mentions *Barbarea vulgaris*, a common species, and it is only the second column which contains information that the author means subspecies *Barbarea vulgaris lepusnica*. Similar situation concerns *Delphinium elatum*, *Pulsatilla pratensis*, *Soldanella pseudomontana*.

Summarizing, in our opinion the draft Red List of Vascular Plants also requires review and additional expert work before it would be adopted by the COP.


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