



LOGGING DOWN OUR FUTURE: MODELS AND FORMS OF ORGANIZED CRIMINAL ILLEGAL LOGGING IN NORTH MACEDONIA



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List of Abbreviations

BP	Border Police
BPS	Bureau for Public Safety
FFSLAEE	Faculty of Forest Sciences, Landscape Architecture and Environmental Engineering
FP	Forest Police
MAFWE	Ministry of Agriculture, Forestry and Water Economy
MEPP	Ministry of Environment and Physical Planning
MOI	Ministry of Interior
NAPFO	National Association of Private Forest Owners
PE	Public Enterprise
PENF	Public Enterprise “National Forests”
PPO	Public Prosecutor’s Office
PRO	Public Revenue Office
SIEN	State Inspectorate for Environment and Nature
SIFH	State Inspectorate for Forestry and Hunting
SLI	State Labor Inspectorate
SMI	State Market Inspectorate
SSO	State Statistical Office

EXECUTIVE SUMMARY

Illegal logging consists of deforestation, which violates the rules and regulations of forest management authorities and related national legislation, i.e., any activities that reduce the fertility of the forest fund, thus endangering or preventing the continuity of forest reproduction and cultivation of that land or endangering the survival of the forest on a larger scale. The research has shown two forms of existing crime currently related to illegal logging in North Macedonia:

1. Petty illegal logging driven by poverty, involving harvesting firewood for personal use.
2. Illegal logging conducted by organized crime groups on different scales, involving general black-market sale for profit, usually accompanied with a vast array of associated crimes.

This report provides an insight into the forms and models of organized crime related to illegal logging, detecting, and identifying its patterns of organization, cooperation and including but not limited to the involvement of public institutions, political factors, and members of local communities.

The report has produced several recommendations. Primarily, a functional reorganization of the Forest Police's (FP) structure and dependence is crucially needed. Currently, the FP falls within the structure and jurisdiction of the Ministry of Agriculture, Forestry and Water Economy (MAFWE). Transferring the employees to the Bureau for Public Safety (BPS) will add on to relevance, but it will also strengthen their role, position, and resources. The current employee body is inadequate in both numbers and readiness, to successfully protect the forest fund of North Macedonia. Strengthening the internal procedures will minimize the risks for external influence, resulting in a decrease of corruption in the FP. Another necessity is the strengthening of the internal procedures in the Public Enterprise National Forests (PENF), including its subsidiaries, which will have two-folded value. The possibilities for intra-institutional mismanagement of resources and corruption are substantial. The FP should promptly increase its transparency and openness to the public, especially in terms of visibility in the local communities. A special hotline number for reporting illegal logging and other devastation of forests needs to be visible and made public. Illegal logging and deforestation are serious problems that affect all aspects of social life. Therefore, to tackle this issue, a comprehensive and coherent approach is needed, encompassing full engagement of the government, state and non-governmental institutions, and local population, to suppress these forms of environmental crime.

INTRODUCTION

Illegal logging has various forms: from illegal logging in public forests and prohibited areas, through false declarations regarding harvested wood, by obtaining logging authorization through bribes. Funds embezzlement, bribery and the waste of natural resources and pollution are some of the most corrosive elements in good governance. All of these contribute to a decrease in the quality of life of many local communities in North Macedonia. On a local level, illegal logging is the most visible part of environmental crime, being impossible to sustain without the knowledge and “consent” of those who are supposed to suppress it. This report aims to identify the main case points of illegal logging, by means of unveiling and mapping of the main environmental corruption issues as one of the principal problems in local communities, through an analysis of models, forms, causes and drivers of illegal logging and corruption.

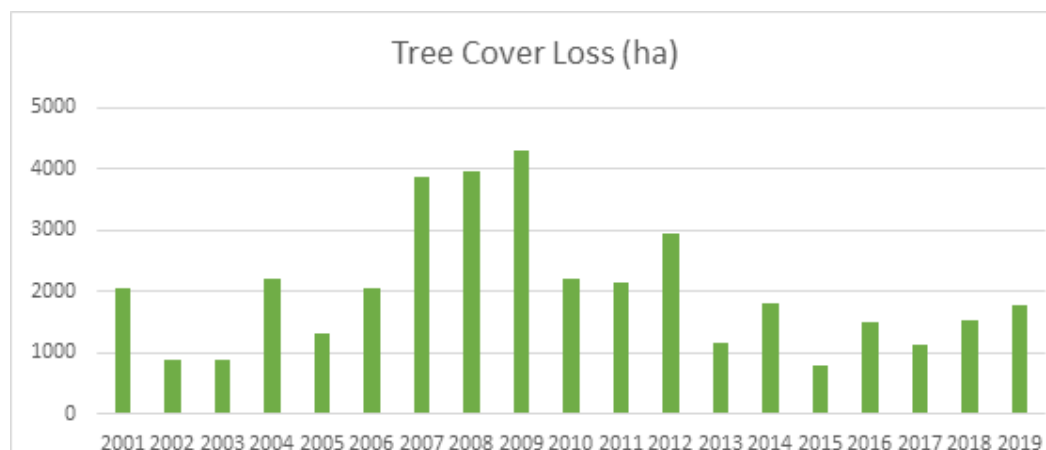
The analysis relies on desk and field research, including analysis of legislation, strategic and policy documents, reports by national and international organizations and institutions, media articles and data obtained using the Freedom of Information Act. Additionally, 29 semi-structured interviews were conducted, involving relevant stakeholders, who allowed the generating of important insights on the issues related to illegal logging, organized crime, and corruption. This report is segmented in three parts. The first part explores the situation with illegal logging in North Macedonia, the institutional settings, forms, and models of illegal logging as well as the causes and drivers of environmental crime and corruption. Furthermore, the paper discusses the structural and systemic factors that serve as facilitators of illegal logging, such as the weak capacities and several deficiencies within the work of the FP and the PENF; at the same time, it gives focus on the evident impunity following the reported cases of illegal logging. The second part consists of municipal snapshots analyzing the cases of illegal logging identified as such by the local stakeholders, including the institutional response to the illegal logging cases at local level. The municipal snapshots hold localized findings that map the most critical issues and hotspots of illegal logging in eight regions, specifically Kumanovo, Kichevo, Bitola, Struga, Tetovo, Skopje, Berovo/Pehchevo and Gostivar. Finally, the report has produced recommendations, all of which aim to address the systemic deficiencies which are acting as enablers for organized crime and corruption.

ILLEGAL LOGGING AND DEFORESTATION IN NORTH MACEDONIA

Forests are ecosystems - a dynamic, constantly changing community of living beings, interacting with non-living components. Forests are valued from social, environmental, cultural, and economic aspects and these ecosystems are a home to many diverse species. Nevertheless, forests change over time and for many other reasons, including human activities. North Macedonia is considered a country with rich biodiversity, with a total forestland area of 1 019 253 ha.¹ The forests are considered national heritage. According to the national constitution “all natural resources of the Republic, flora and fauna, common goods, as well as objects and facilities of special cultural and historical significance determined by law are goods of general interest to the Republic and are subjected to special protection.”² Traditionally, forests are often perceived by society as a resource that provides material goods, primarily wood and other forest by-products. Moreover, the forests in North Macedonia have a significant economic, social, and ecological function that improves the overall quality of life, especially in rural and mountainous areas, as stipulated by the Law on Forests.³

However, according to Global Forest Watch, since 2001 North Macedonia has lost 38.600 ha of tree cover, equivalent to a 4.9% decrease.⁴ Wildfires and illegal logging have been identified as the main causes of deforestation.⁵ Degradation of forests is a criminal offence according to the national Criminal Code. Article 226 stipulates that “a person, who, contrary to a regulation or order from the competent authorities or organisations, converts, cuts or devastates forests or whitewashes trees or otherwise devastated forests will be fined or imprisoned for up to three years”.⁶

Chart 1: Tree cover loss in North Macedonia since 2001.



Source: Global Forest Watch

1. PENF, “About Forests,” accessed December 18, 2020, <http://www.mkdsumi.com.mk/zasumite.php?page=3&s=3>

2. Constitution of Republic of Macedonia,” November 17, 1991, <https://www.sobranie.mk/content/Odluki%20USTAV/Us-tavSRS.M.pdf>

3. “Law on Forests” (Official Gazette of the Republic of Macedonia, No. 64/09, May 22, 2009), http://www.mkdsumi.com.mk/pdf/Zakon_za_sumite_64_22052009.pdf

4. Global Forest Watch, “Macedonia Interactive Forest Map & Tree Cover Change Data,” accessed December 18, 2020, <https://www.globalforestwatch.org/map/country/MKD/?mainMap=eyJzaG93QW5hbHlzaXMiOnRydWV9&map=eyJjZW-50ZXliOnsibGF0Ijo0MS42MDEyMDI2NzI2MTI0OSwibG5nljoyMS43MzA5NTAzNTUwMjYwN30sInpvc20iOiJ1MjU4NDg-3Mjc1OTI2LCJjYW5Cb3VuZCI6ZmFsc2V9>

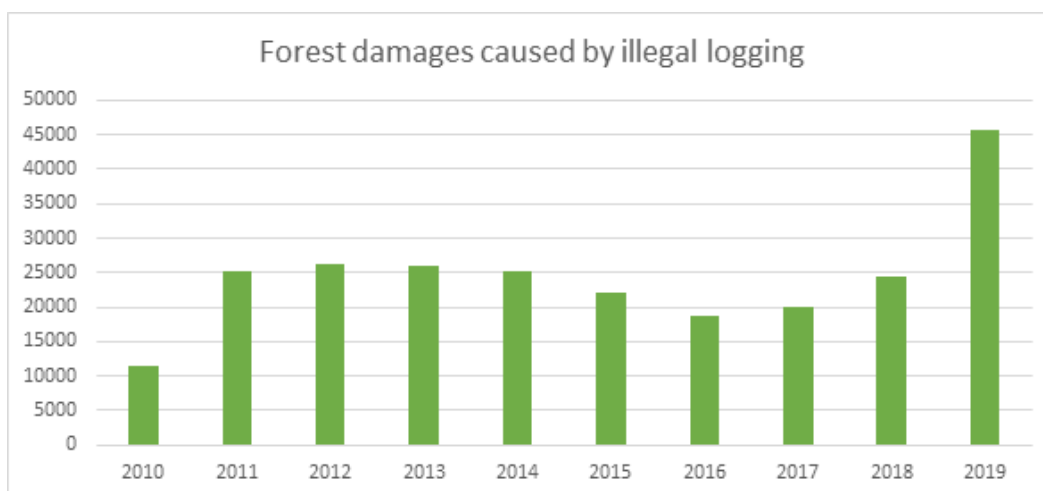
5. PENF, “About Forests.”

6. “Criminal Code” (Official Gazette of the Republic of Macedonia, No. 55/13, November 24, 2013), <https://www.pravdiko.mk/wp-content/uploads/2013/11/Krivichen-zakonik-integralen-prechisten-tekst.pdf>

This criminal offense consists of deforestation, which violates the rules and regulations of forest management authorities and related national legislature, i.e., any activities that reduce the fertility of the forest fund, thus endangering or preventing the continuity of forest reproduction and cultivation of that land or endangering the survival of the forest on a larger scale.

According to the State Statistical Office (SSO), since 2010 the forest damage caused by illegal logging in North Macedonia amounts to 245118 m³.⁷ However, many experts are sceptical of this data, because the last inventory of national forest funds has been conducted in 1979.⁸

Chart 2: Forest damages caused by illegal logging



Source: SSO

Primarily, the illegally harvested timber is used as firewood, and the prices of timber on the black market are much lower than the one legally sold. In a predominant number of cases, the motive for illegal logging is obtaining illegal profit or resale of illegally cut timber.⁹ Furthermore, crime and corruption in forestry are so advanced that they have severe consequences to the industry. The illegal logging of the so-called “forest mafia” is widespread in certain areas of the country. It is estimated that large sums of money are invested in this criminal business, which even makes “human lives cheaper than timber”.¹⁰ Some estimates show that the “business” of illegal logging is worth more than 60 million years per annum. In some instances, established criminal groups opt to quit more conventional forms of crime, and substitute them with extensive illegal logging. Ultimately, deforestation leads to devastation of natural resources, environmental pollution, soil erosion, flash floods and landslides as well as damages to the economic system, all of which weaken the broader structures of governance and the rule of law.¹¹

7. State Statistical Office

8. Anonymous Interlocutor A, Forest Management in North Macedonia, October 19, 2020.

9. Anonymous Interlocutor, Environmental Crime and Illegal Logging, October 20, 2020.

10. “Illegal Logging, Corrupt Deals for Personal Gain,” Radio Network Kanal 77 (blog), May 7, 2020, <https://kanal77.mk/%d0%b4%d0%b8%d0%b2%d0%b0%d1%82%d0%b0-%d1%81%d0%b5%d1%87%d0%b0-%d0%bd%d0%b0-%d1%88%d1%83%d0%bc%d0%b8%d1%82%d0%b5-%d0%ba%d0%be%d1%80%d1%83%d0%bf%d1%82%d0%b8%d0%b2%d0%bd%d0%b8-%d0%b7%d0%b4%d0%b5%d0%bb/>

11. Usman Ashraf, “State, Society and Timber Mafia in Forest Conservation,” December 15, 2017, <https://thesis.eur.nl/pub/41767>

THE INSTITUTIONAL SETTING

Forests in North Macedonia are regulated by the Law on Forests.

The Government manages state-owned forests and forest lands through the following institutions:¹²

- Ministry of Agriculture, Forestry and Water Economy (MAFWE);
- the State Inspectorate for Forestry and Hunting, as a body within the MAFWE – SIFH;
- the Forest Police as a sector within MAFWE – FP;
- the Public Enterprise ‘National Forests’ – PENF
- Ministry of Environment and Physical Planning (MEPP),
- the National Association of Private Forests Owners (NAPFO), and
- ‘Hans Em’ Faculty of Forest Sciences, Landscape Architecture and Environmental engineering - FFSLAEE

According to the Law on Forests, there are two types of forest ownership: public and private. Publicly owned forests are managed by PENF, except for those in protected areas that are managed by the public institutions “National Parks”.¹³ Private forests are also managed by the PE, because their owners do not have management plans and must obtain a permit for any activity they need to carry out. Of the total forest fund, state-owned forests add up to 89.1%, and privately owned forests amount to 10.9%.¹⁴ The SIFH within the MAFWE controls all legal entities that manage this fund. The SIFH has several responsibilities, such as controlling overall logging, implementing annual plans, and issuing logging approvals. The SIFH also files charges for illegal logging to the FP.¹⁵

Furthermore, the FP protects the forests in both state and private ownership, according to the Law on Forests and the Rules of Procedure. It is the duty of the FP to guard the forests, to intervene, prevent, identify, and apprehend persons committing offenses or crimes related to forests, and to inspect all means by which timber and other forest products are transported.¹⁶ The FP documents persons found transporting timber and if they do not have the appropriate documents, the FP can temporarily confiscate their means of transportation and file charges against the offenders. In the process of confiscation, the FP applies different strategies, but they are still facing major challenges, due to the loggers being well organized and equipped.¹⁷ In the period from 2010 to 2020, the FP has confiscated a total number of 4.238 vehicles and 6.626 aids to logging (such as chainsaws, axes, trailers, harnesses, and other equipment).¹⁸ The confiscated illegally logged timber in the last ten years amounts to 26.927 m³, whereas the un-confiscated timber amounts to 15.541 m³.

12. M. Stojanovska et al., “The Process of Forest Management Plans Preparation in the Republic of Macedonia: Does It Comprise Governance Principles of Participation, Transparency and Accountability?,” *Forest Policy and Economics*, Assessing forest governance - analytical concepts and their application, 49 (December 1, 2014): 51–56, <https://doi.org/10.1016/j.forpol.2013.10.003> Anonymous Interlocutor A, Forest Management in North Macedonia; PENF, “About Forests.”

13. “Law on Forests.”

14. PENF, “About Forests.”

15. Stojanovska et al., “The Process of Forest Management Plans Preparation in the Republic of Macedonia.”

16. Anonymous Interlocutor A, Forest Management in North Macedonia.

17. Anonymous Interlocutor A.

18. Data obtained by the MAFWE through the Freedom of Information Act.

Table 1: Illegally logged timber confiscated by the FP from 2010 to 2020.

Year	Firewood (m3)	Technical wood (logs) (m3)	Other technical wood (m3)	Un-confiscated timber (m3)
2010	91	1	0	28
2011	1.954	214	39	2.982
2012	2.080	83	6	1.940
2013	3.019	175	7	2.328
2014	3.875	143	17	2.769
2015	6.242	235	98	2.630
2016	2.095	3	59	737
2017	2.077	163	18	772
2018	2.075	71	21	1.120
2019	2.309	0	0	235
2020	857	62	7	143

Source: Data obtained by MAFWE through the Freedom of Information Act.

Moreover, the FP files criminal charges if the performed illegal logging activities exceed the amount of 1m3. Often, forest guards or local citizens report cases of illegal logging, but it also happens that these cases are discovered during a patrol.¹⁹ The inability of the FP to immediately identify illegal loggers is often a major problem. In addition, loggers use old and unregistered vehicles to prevent suffering heavy losses if they are to be seized, and the FP officers are often exposed to threats, dangers, and physical attacks. In the period from 2010 to 2020, the FP filed a total number of 43.120 illegal logging reports and received a total number of 7.734 reports.²⁰

Table 2: Writs and communication regarding illegal logging cases filed by the FP in the period 2010 to 2020

Year	Primary Court	PPO	SIFH	MOI
2010	2.456	204	23	2
2011	2.056	183	17	9
2012	2.012	212	4	6
2013	2.624	273	12	7
2014	2.224	265	6	9
2015	1.833	322	6	66
2016	1.228	174	4	17
2017	1.204	187	1	29
2018	1.167	216	1	9
2019	909	171	0	29
2020	642	117	3	16

Source: Data obtained by MAFWE through the Freedom of Information Act.

19. Anonymous Interlocutor, Environmental Crime and Illegal Logging.

20. Data obtained by the MAFWE through the Freedom of Information Act.

The Ministry of Interior (MOI) is also involved in the process of combating illegal logging, as per the Law on Forests and the Criminal Code. The MOI has a very important role in the process of implementation of legislation to protect the environment and nature, according to the Constitution, the Criminal code, the Law on Misdemeanor and Law on Forests. There is no designated sector in the MOI that deals with environmental crime and the activities for suppression of illegal logging are conducted in synergy with other stakeholders.²¹ In 2014 the MOI, in cooperation with the SIFH, the State Market Inspectorate (SMI), the State Labor Inspectorate (SLI) and the Public Revenue Office (PRO), launched the “Gora” operation, aimed at combating crimes related to illegal logging, deforestation and timber trading. Since the beginning of the operation, a total of 1.334 criminal charges have been filed against 2.204 perpetrators, and total amount of 97.843 m3 timber was confiscated. The material damage is estimated at more than 335 million denars.²²

Table 3: Statistics of the “Gora” Operation

	Criminal Charges	Perpetrators	Criminal Offences	Confiscated timber (m3)	Material Damage (MKD)
2014	155	265	206	3.286	43.114.187
2015	250	498	408	32.320	126.116.825
2016	263	397	358	11.725	39.213.169
2017	160	247	212	32.900	61.975.165
2018	161	267	220	7.718	32.316.877
2019	213	355	260	6.494	7.680.516
2020	102	175	139	3.400	25.263.387

Source: Data obtained from the MOI through the Freedom of Information Act.

CRIMES RELATING TO ILLEGAL LOGGING

The aforementioned statistics indicate a high prevalence of illegal logging related crimes in North Macedonia. On the other hand, experts argue that illegal logging is more severe than indicated, because most crimes of this form are unreported or uninvestigated. The most pervasive illegal logging activities are usually concentrated in certain areas or hotspots and occur more frequently in certain periods of the days (hot times). One of the interviewed stakeholders disclosed that these crimes occur most frequently during the night or early in the morning.²³ The most pressing areas of illegal logging are shown on the maps bellow:

According to the Law on Forests, it is a legal obligation of all entities that manage the forests to protect forests from illegal logging.²⁴ Therefore, the forest enterprises have forest guards, tasked with the identification of offenders involved in illegal logging, as well as reporting such cases to the FP. Forest guards also keep records of violations related to illegal logging and conduct monthly evaluations of forest damages. According to the general forest management plan, the forests are divided into forest management units, each unit being responsible for the adoption and implementation of

21. Anonymous Interlocutor, Environmental Crime and Illegal Logging.

22. Data obtained by the MOI through the Freedom of Information Act.

23. Anonymous Police Officer, Illegal Logging, November 24, 2020.

24. “Law on Forests.”

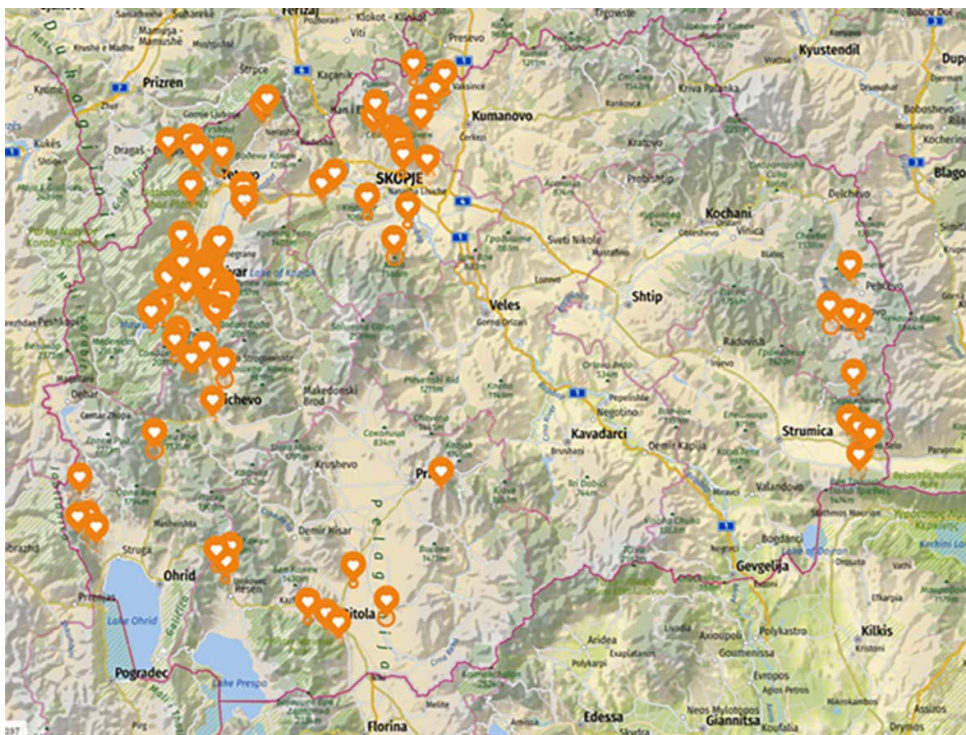
annual logging plans.²⁵ Based on these plans, PENF employees control tree marking, i.e., whether it is conducted according to the legal regulations and with issued logging permits. Forest enterprises oversee the procurement of logging services, as well as timber supply and transportation.

Figure 3: Devastated Forest Areas



Source: Global Forest Watch

Figure 4: Illegal Logging Hotspots



Source: Data obtained through interviews

25. Mirjana Stevanov et al., "The (New) Role of Public Forest Administration in Western Balkans: Examples from Serbia, Croatia, FYR Macedonia, and Republika Srpska," Canadian Journal of Forest Research, April 20, 2018, <https://doi.org/10.1139/cjfr-2017-0395>

During the logging process, the forest inspector controls whether the activities are carried out within the logging plans and issues relevant documents for timber supply and transport (delivery notes). However, it has been noticed that irregularities occur during this process – logging is sometimes allowed without proper permits, as well as financial compensation (bribes) is offered to employees of forest enterprises. In certain cases, blank documents are issued, i.e., without specification of the actual amount of permitted logging quantities. Though, individuals are permitted to conduct logging activities in state-owned low-stemmed forests, but only for personal use, and the amount should not exceed 15m³. Irregularities can occur in these cases as well because the same person can perform multiple loggings, allegedly on behalf of other persons or entities.

In North Macedonia, there are two forms of crimes related to illegal logging: petty, illegal logging driven by poverty, involving harvesting firewood for personal use and illegal logging conducted by organized criminal groups on different scales, involving general black-market sale for profit. The latter is usually accompanied by a vast array of associated crimes, including but not limited to: linked crimes (such as aiding or abetting the perpetrator, participation in criminal conspiracy or an organized crime enterprise, receiving stolen property, etc.); revenue crimes (which include fees that illegal loggers seek to evade); fraud (i.e. intentionally misrepresenting material facts, such as species, volume, grade etc.); bribery and extortion, and governmental abuse of authority and forgery. This second category of crimes is of deeper interest to this study. Because of the large amount of timber that needs to be harvested, loaded, transported, and sold, the illegal logging is difficult to conceal. Therefore, it is impossible for a large-scale illegal logging activity to take place without explicit or implicit consent of the forest protection authorities.

Indeed, illegal logging is generally followed by extensive corruption at all stages of forest management. Political influence and bribes are often used for facilitation of logging without proper permits or to gain access to forests. Also, law enforcement officials may be bribed to allow illegally harvested logs transportation, and there is also a due process of corrupt transactions to conduct and trade the logs once they have been harvested, in a form similar to money laundering, i.e., “timber laundering”; this also involves bribing timber certifiers to whitewash illegally harvested logs. Also, judicial corruption may prevent prosecution of such violations, and financial transactions also can be corrupted to hide evidence and to keep the timber trade running. Moreover, the private gain from forestry corruption may not be monetary, i.e., public officials may strive to consolidate political power or gain profound influence in the nearby areas. The involvement of members of local communities is usually accomplished through incentives or coercion and threats of violence. Additionally, the perpetrators tend to be violent and do not hesitate to use firearms. This makes officials quite vulnerable and may inadvertently become a part of the organized crime ring themselves, because they are prevented from effectively conducting their duties.

Furthermore, sanitation of forests by harvesting timber after a fire is a common procedural occurrence. The purpose of it is to clear out waste, dead logs, as well as to allow the smoke filling the forest to escape. The act of sanitation itself involves thinning out, pruning, and removing tree waste. North Macedonia has had several instances of large forest fires; PENF is principally obliged to organize the sanitation of the affected area after it has happened. Respondents have noted that such sanitation often occurs years after the fire, being scaled as much larger (a larger portion of the forest was cut off), than

what was initially caught in the fire. It is argued that the most common perpetrators of forest fires are the so-called «forest mafia» that set the forests on fire to gain financial profit by reselling the wood harvested in the affected area.

DRIVERS OF ILLEGAL LOGGING

The underlying causes of illegal logging in North Macedonia are stemming from many structural factors, ranging from forest mismanagement to legislative deficiencies. Poverty and poor governance are some of the structural factors that contribute to the flourishing of black-market businesses with illegal logging. The reason for this is that illegal timber is usually cheaper compared to the legal one. Moreover, due to poor governance and forest management, the laws in place are lax at addressing the issues stemming from illegal logging. This brings about limited resources and weak institutions that result in inadequate law enforcement. Efforts to counter illegal logging are being obstructed by a lack of personnel, infrastructure, and equipment of the PENF, FP and MOI. Additionally, the FP officers receive humble salaries (18.200 denars or 295 euros net) compared to the high commercial value of timber (min. 40 euros/m³) and the dangers they encounter at work.

Namely, the illegal loggers tend to be violent and aggressive towards forest guards and police officers, and do not hesitate to use firearms. Thus far, three forest guards have lost their lives in the line of duty. Most recently, in September 2020 five police officers were attacked and one of them had been seriously injured by illegal loggers near the city of Veles. On the other hand, police officers argue that it is difficult to maintain control over the local communities, because there is low level of trust in the police. Furthermore, although Article 226 of the Criminal Code stipulates penalties or imprisonment for up to three years for these criminal acts, the penal policy's outcomes are lenient. Illegal loggers often end up with misdemeanor charges and the courts rarely impose adequate fines and often, penalties do not translate as a significant deterrent.

The supply-demand chain of firewood is another pivotal driver of illegal logging. Forestry experts claim that the PENF can barely supply half of the demand for firewood in North Macedonia. This paves the way for illegal loggers organized in hierarchical criminal groups to flood the market with illegal wood. Furthermore, many of the citizens do not believe that by buying illegally logged wood they participate in felonies and additionally feed organized crime. To the contrary, many of the end users believe that state institutions have failed to provide them with heating resources, and that illegal distributors are just modern day “Robin Hoods” that try to “help” the local community. In many of the cases, citizens are not aware that they have been manipulated by the illegal distributors, who often spread disinformation that the PENF had run out of wood, or that official state prices of firewood are much higher than they actually are. This creates even greater space for organized criminal groups to profit from the expanding criminal activity.

Another important driver of illegal logging is the lack of central heating and gasification of the country. Only the central urban areas of the capital – the City of Skopje, and very limited parts of some of the bigger cities have access to central heating. This makes electricity and timber the main heating resources. Taking into consideration that electricity is rather expensive in comparison to the average wages and the living standard, timber becomes the primary choice of heating resource, especially in smaller urban areas and the wider rural regions. This is another factor which exacerbates illegal logging significantly.

MUNICIPAL SNAPSHOTS

This section provides localized findings that map out the most critical issues of illegal logging in eight regions, focusing on Kumanovo, Kichevo, Bitola, Struga, Tetovo, Skopje, Berovo/Pehchevo and Gostivar. Each municipal snapshot holds a brief description of the region with an emphasis on the local environment and natural resources, hotspots of illegal logging (villages, areas, and specific forests) based on interviews, news reports and other previously published papers, reports, materials, and conferences. It also identifies the forms of organized crime that have been pointed out by the local stakeholders and institutional responses to the illegal logging cases at local level, based on the data collected from the public institutions, official statistics, and other available sources of information.

KUMANOVO

The Kumanovo region is located in the north-eastern part of the country. The region on the west and north side is surrounded by old and huge mountains. To the west rise the branches of Skopska Crna Gora, while to the north are the slopes of the bare Ruen, and the slopes of the medium high Kozjak Mountain. To the east are the German Mountain and the Slaviska Valley, while to the south and southeast Gradiska Mountain, consisted mostly of hilly terrain.



I meet them (i.e., illegal loggers) on daily basis. Yet, I cannot take any action. I am not risking my life for 300 euros per month. No proper equipment, no vehicles, not many honest colleagues. No one asks how the trucks loaded with wood from Lipkovo and Kumanovo reach Tetovo, Gostivar, Kichevo...even Struga.

Illegal logging has plagued Kumanovo and its surrounding areas. In the past 10 years, the illegal logging industry has expanded at an exponential rate and scale. This has resulted in what was once a thriving forest landscape, to become an increasingly barren land. FP operates under difficult conditions. Areas of concern include: a deficit in organizational structures, lack of adequate protection and uniforms and no tangible benefits affiliated to their length of employment. As an interlocutor from the FP in Kumanovo described the situation: *“I meet them (i.e., illegal loggers) on daily basis. Yet, I cannot take any action. I am not risking my life for 300 euros per month. No proper equipment, no vehicles, not many honest colleagues. No one asks how the trucks loaded with wood from Lipkovo and*

*Kumanovo reach Tetovo, Gostivar, Kichevo...even Struga”.*²⁶ The forest fund is managed by the PENF, through its subsidiary “Kumanovo”, with a forest area of 23.044,44 ha. In the period from 2010 to 2019, the subsidiary “Kumanovo” has filed a total of 8 criminal charges and 22 misdemeanour charges for illegal logging.²⁷ In addition, a total of 66 cases of illegal logging by an unknown perpetrator were detected. However, the PPO in Kumanovo has processed only 15 charges for illegal logging in the past ten years.²⁸

One interlocutor, with prior knowledge of the FP operations, noted that despite the presence of continuous illegal logging, only a few criminal charges have been filed against individuals.

26. Anonymous Interlocutor A, Illegal logging in Kumanovo, 4.11.2020.

27. Data obtained by the PENF through the Freedom of Information Act.

28. Data obtained by the PPO - Kumanovo through the Freedom of Information Act

This trend represents larger social and criminal issues. There is an underbelly of organized criminal groups, operating and profiteering from the illegal logging industry. These groups utilize their networks with public enterprises such as PENF, which enables them to distribute wood in exchange for a monetary bribe.²⁹

Moreover, the way in which the networks operate is predominantly through threats, physical violence, and corruption. These issues point to the models of organised crime developed in this report. Specifically, organised criminal groups cooperate with members of the FP, MOI and have the backing of political parties. In Kumanovo, criminal groups often have an internal “contact” which “covers up” illicit activities.³⁰

The interlocutor noted that criminal groups exert control over members of the FP and customs police within large municipal areas like Arachinovo and Skopje.³¹ An area that is of particular concern is Brest, where the interlocutor noted that often 5-6 trucks come to collect wood to transport it to Skopje. Around 10 “employees” usually staff these trucks. It is unknown if they hold a valid logging license.³² Nevertheless, it is presumed that they have permission to perform logging activities from government representatives.

Moreover, the interlocutor noted that whenever the local police and the FP are patrolling together, there are no loggers at work because they would be previously informed by an internal “contact” and would consequently cease their activities.³³

According to one of our interlocutors, there is a company in the village of Goshince, Municipality of Lipkovo, which is involved both in legal and illegal wood transportation.³⁴ Our source explains that *“...this company conducts logging even on the territory of Kosovo. For approximately half of the wooden mass, they have the necessary permit, while the other half is completely illegal. Their output of wood is much greater than their input. Controls have been conducted, charges have been filed, but there is no epilogue. No one can do anything to them. The company recently opened another warehouse in the village of Brest.”*³⁵ Media reports show that five years ago criminal charges were filed against this company on forging documents related to wood management and transport.³⁶ These activities fall within “The Institutionalized” form of organized criminal illegal logging described after the municipal snapshots.

Criminal groups in Kumanovo also distribute wood to end consumers under the pretences of a valid licence. In addition, they employ other methods such as: manipulating end consumers that they have legally obtained the wood and that the wood they are selling is of higher quality.³⁷

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29. Anonymous Interlocutor A, Illegal logging in Kumanovo.

30. Anonymous Interlocutor A.

31. Anonymous Interlocutor B, Illegal Logging Kumanovo, 6.11.2020.

32. Anonymous Interlocutor B.

33. Anonymous Interlocutor B.

34. Anonymous Interlocutor A, Illegal logging in Kumanovo.

35. Anonymous Interlocutor A.

36. <https://www.mkd.mk/crna-hronika/krivichna-prijava-za-falsifikuvani-dokumenti-za-ogrevno-drvo>

37. Anonymous Interlocutor B, Illegal Logging Kumanovo.

Moreover, they would distort the price of the wood, so it appears to be lower than the market average. Yet, they often sell much less than the end consumers think they had bought. These groups are protected by influential public and political figures.³⁸ These groups are very well known to the general public in Kumanovo, but interlocutors refrained from mentioning specific names of companies or individuals. Also, the illegal logging is covered up by staff within the municipal offices. After the loggers are finished, instead of distributing the wood to the designated “lower income families”, they are resold to various parties. The paperwork is never completed and there is no evidence pointing to the corruption.³⁹ This form of organized criminal illegal logging is referred to as “Urban Cutting” and it is extensively explained below.

KICHEVO

The Kichevo region is in the western part of the country, located in the Kichevo Valley, which is a clearly shaped natural unit, surrounded by high mountains - on the west side rises the mountain Bistra, on the south side along the valley of the river Treska extends to Ilin mountain. The mountains, on the other hand, are one of the most striking natural attractions in the region, rich in forests and a large number of pastures. Sadly, it is evident that the natural beauties of this region are underutilized and their potential for development of tourism is neglected. Alongside illegal landfills, the biggest problem of this region is the deforestation, present in almost every village. The interlocutors from Gostivar and Kumanovo noted several areas on the territory of North Macedonia, suffering with extensive consequences from illegal logging. One such area is Kichevo. The forest fund is managed by the PENF, through its subsidiary “Lopushnik - Kichevo”, with a forest area of 55.340,88 ha. In the period from 2010 to 2019, the subsidiary “Lopushnik - Kichevo” has filed a total of 223 criminal charges and 635 misdemeanour charges for illegal logging⁴⁰, while at the same time, 72.591 cases of illegal logging by an unknown perpetrator were detected.

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In Kichevo and its surroundings, illegal logging is most often happening in areas inhabited by ethnic Macedonians. I cannot understand these people. Only stupid people can cut the forests that have been given to us by God.

According to the interlocutors, organized illegal logging groups that operate in Kichevo function in a hierarchical fashion.⁴¹ The hierarchy is present in all forms of illegal logging activities, where the leader of the organized group has ties with the PENF and has a valid license, allowing them to cut more wood. The woodcutters are local villagers (about 5 to 6 people) who work for their superior and distribute the wood.⁴² The interlocutor states that they can employ aggressive tactics such as causing diversions and property damage. Moreover, the interlocutor describes their *modus operandi* – the loggers often trespass on land that has a valid license and excessively log it.⁴³ When the police inspect the land, they find that the unmarked trees have been cut down and then it is the license-holders being penalized, when in fact it was the organized criminal group that committed the crime. However, all these loggers are often

38. Anonymous Interlocutor B.

39. Ibid.

40. Data obtained by the PENF through the Freedom of Information Act.

41. Anonymous Interlocutor A, Illegal Logging in Kichevo, October 21, 2020.

42. Anonymous Interlocutor A.

43. Anonymous Interlocutor A.

“backed up” by members within the local government or police.⁴⁴

There is corruption at the local level as well. Often illegal logging is done by local villagers that log in an “unregulated” manner. For example, members of different ethnic groups (Albanians, Roma) go in individual trucks, and log illegally for the purpose of household heating or to resell a small quantity for some amount of money and stay above the level of poverty.⁴⁵ The interlocutor estimates that 15-16.000 hectares are illegally logged on annual basis. The local, municipal-level corruption is present because the police authorities do not engage in regular check-ups nor file charges against potential suspects. There have also been instances of racketeers that enter private property and log there.⁴⁶ The interlocutor provided an example where a Roma man trespassed on his land and started logging. When confronted, the trespasser pulled out a knife and started making threats. This is the case when it concerns private subcontractors contracted by PENF, who take under concession large parts of forests that PENF is unable to maintain.⁴⁷ The subcontractors then get the necessary licenses and exploit the forest. FP looks for several key features during their inspection. This includes whether the trees the contractors have chopped possess designated marks, whether their company’s paperwork has the appropriate stamp and, whether they have the necessary logging licence. Despite these safeguards, the interlocutor noted that these elements are often not present and turn out as irrelevant, as the loggers will still benefit from their connections.⁴⁸

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The illegal loggers operate in smaller groups. A group of ethnic Albanians will steal 2-3 vans of trees, another group of ethnic Roma will steal another 2-3 trucks of wood...You cannot explain to an ethnic Roma person that you have inherited the forest from your ancestors – he pulls out a knife and tries to stab you. Plus, most of them are drug addicts or former convicts...Those who come from Albania – they are insane, they are not normal people, you cannot discuss with them peacefully and normally. He pulls an automated chainsaw on you and tries to cut you to pieces. They often consume alcohol as well...

Our field research in Kichevo and its surroundings showed that there is sorts of rivalry and at times, even a “race to the bottom” between the local FP and the regular police (MOI), in terms of who will do less, and engage less in preventing illegal logging. The FP often underlines that the lack of suitable resources and training are at the core of their limited success in the fight against illegal logging. On the other hand, the MOI members claim that they are overwhelmed with work and that every state and local institution in the country counts on their presence and authority, regarding law enforcement. As one of our interlocutors, an employee at the MOI explained: *“We cannot be everywhere all the time. Regarding illegal logging, this is the competence of the FP. They have the competences, badges, firearms, and the full responsibility to tackle illegal logging. There are only two articles in the Criminal Code according to which the MOI can intervene in cases of illegal logging. On the other hand, there is an entire set of legislation precisely regulating the work of the FP. Always the same story. Everyone counts on the MOI: the municipality, the FP, the state inspectorates...no one can do anything without our help.”*⁴⁹

44. Ibid.

45. Anonymous Interlocutor B, Illegal Logging in Kichevo, October 21, 2020.

46. Anonymous Interlocutor B.

47. Anonymous Interlocutor B.

48. Anonymous Interlocutor B.

49. Anonymous Interlocutor A, Illegal Logging in Kichevo.

Kichevo is one of the municipalities where the issue of illegal logging perpetuates inter-ethnic intolerance.⁵⁰ Ethnic Macedonians usually see it as crime done by other ethnic groups, in particular ethnic Albanians, ethnic Roma, and ethnic Turks. Speaking to an employee from the “Lopushnik” subsidiary of the PENF, an ethnic Macedonian, the problem of illegal logging was explained in the following manner: *“The illegal loggers operate in smaller groups. A group of ethnic Albanians will steal 2-3 vans of trees, another group of ethnic Roma will steal another 2-3 trucks of wood...You cannot explain to an ethnic Roma person that you have inherited the forest from your ancestors – he pulls out a knife and tries to stab you. Plus, most of them are drug addicts or former convicts... Those who come from Albania – they are insane, they are not normal people, you cannot discuss with them peacefully and normally. He pulls an automated chainsaw on you and tries to cut you to pieces. They often consume alcohol as well...”*⁵¹

Conversely, an employee from the same public enterprise, an ethnic Albanian, employed as a forest ranger, painted the completely opposite picture in terms of the ethnic background of the perpetrators engaged in illegal logging in Kichevo: *“In Kichevo and its surroundings, illegal logging is most often happening in areas inhabited by ethnic Macedonians. I cannot understand these people. Only stupid people can cut the forests that have been given to us by God.”* This inter-ethnic blame game is another factor that prevents the fight against illegal logging in the Kichevo area.⁵²



50. Anonymous Interlocutor A; Anonymous Interlocutor B, Illegal Logging in Kichevo.

51. Anonymous Interlocutor B, Illegal Logging in Kichevo.

52. Anonymous Interlocutor B.

Recent media reports have shown efforts by the police to take active measures against institutional corruption in the NF subsidiary “Lopushnik”. In July 2018, the police in Kichevo filed charges against an employee for alleged misconduct within the workplace, result with material damage of approximately 4.000 euros.⁵³ In February this year, the MOI initiated criminal charges against the General Director of PENF, the head of the subsidiary “Lopushnik” in Kichevo, as well as three other employees at the subsidiary, for alleged abuse of their official positions. They had been charged for enabling illegal logging in the Kichevo surroundings, causing financial damage to the PE of approximately 300.000 euros.⁵⁴ There is no official available information whether the PPO in Kichevo had prosecuted any of these individuals, and whether there had been any court proceedings. The research team had sent a request for information on the total number of cases of illegal logging, but we did not receive a response from the PPO.

BITOLA

Bitola, the city of consuls, is located at the north-eastern foot of Mount Baba and the south-eastern foot of Oblak Mountain, in the central part of the Pelagonija Valley, surrounded with vast forest areas that fall under the scope of “Pelister” NP. The relatively favorable natural conditions have enabled the Bitola region and beyond to have an abundance of forest funds. The NP “Pelister” is a popular winter attraction, often visited by tourists and mountaineers. The largest and highest quality forests in this region are around the mountain peak Kajmakchalan on Nidje Mountain and the peak Pelister on Baba Mountain, as well as parts of Bigla Mountain. However, Bitola is also favorably located for those engaged in the illegal logging trade, including international trade with our neighboring countries.

The forest fund is managed by the PENF, through its subsidiary “Kajmakchalan - Bitola”, with a forest area of 42.320,21 ha. In the period from 2010 to 2019, the subsidiary “Kajmakchalan - Bitola” has not filed any criminal charges for illegal logging, whilst 21 misdemeanor charges have been filed.⁵⁵ Also, a total of 144 cases of illegal logging by an unknown perpetrator have been registered. When the research team requested information about the processed charges relating to illegal logging, the PPO replied that they do not have such data.

The perpetrators engaged in the illegal logging trade are not necessarily members of an organized crime network but are rather private individuals.⁵⁶ One of the interlocutors stated that, it is usually the villagers from local areas who are able to quickly go up into the forest, cut the wood, place the logs on horses and go back to their villages.⁵⁷ They usually go several times, in order to obtain a surplus. As stated, the primary purpose of this type of logging is to resell the wood to those less able to obtain their logs for heating and of course, to make a profit. This is prevalent in the Bair municipality, where mostly Roma people live and log solely for the purpose of reselling.⁵⁸

Some of the villagers engaged in this trade may be in possession of a valid logging license.⁵⁹ However, they deploy deceptive tactics, one of which is where they cut unmarked trees that are in the surrounding of the area for which they have the license. Then, they would leave some of those marked trees intact, to appear that they still need to return to cut them.

53. <https://www.pravdiko.mk/krivichna-protiv-vrabotena-vo-pssh-lopushnik/>

54. <https://www.mkd.mk/makedonija/sudstvo/krivichna-prijava-za-direktorot-na-nacionalni-shumi>

55. Data obtained by the PENF through the Freedom of Information Act

56. Anonymous Interlocutor A, Illegal Logging in Bitola, October 25, 2020.

57. Anonymous Interlocutor A.

58. Anonymous Interlocutor A.

59. Anonymous Interlocutor C, Illegal logging in Bitola, October 26, 2020.



These groups are very well organized. They are hierarchical and very well inter-linked to institutional and party structures. At times, when they feel threatened, they can turn violent. Several of my colleagues have been attacked and often injured throughout the years. Additionally, due to our limited resources, especially vehicles, they know that we are patrolling in one area of the region, so they freely log in another, tens of kilometers away...It is not just the illegal logging. Illegal hunting is also an issue. There is a functional criminal link between North Macedonia and Italy through neighboring Albania. Specific species are hunted in the forests around Resen and then smuggled through Albania into Italy where expensive exclusive sausages are prepared and sold.

This perpetuates the cycle of disguise – they appear to be doing everything properly, while illegally logging unmarked trees.⁶⁰ The FP is aware of this fact. For those that log with a valid license, the FP sometimes inspects whether the loggers have exceeded the cubic limit. Moreover, interlocutors have noted that the Macedonian market for certain trees found in the NP, such as the Molika, is under-developed.⁶¹ This is because the Macedonian market does not use this type of tree to create any products of value and that not many national companies can afford it.⁶² As a result, there have been rumors in the past that there are logging firms which export the wood through Albania and Greece into Italy and other countries in the west. Couple of interlocutors pointed towards a criminal ring that implicated famous businessmen and politicians alike.⁶³ There are indications that this group facilitated the illegal logging and smuggling of the “Molika” tree to Greece. Afterwards, the illegally obtained funds were allegedly used for political and campaign financing of political parties.⁶⁴

Interlocutors claim that during election period, which in North Macedonia is rather frequent due to often early general elections, illegal logging is on the high. There are two main reasons pointed out by informed persons. The first is related to political campaign financing. Significant amounts of money obtained through illegal logging are infused directly in political party campaigns, mainly through prominent

powerful local party proponents, in particular form political parties that are in power on local level. Rumor has it that state institution representatives massively turn a blind eye to illegal logging, at times even encourage the criminal groups to log more in order to generate more funds that would transform into unregistered party donations. The second reason is that local politicians in power often promise to citizens in the rural areas that if they remain in power, or come to power, local inhabitants will be allowed to log illegally in order to get “free heating”, but also to survive easier and manage to tackle poverty and unemployment. This once again shows the intertwining of crime and politics in North Macedonia.

One of the interlocutors mentioned an organized criminal group that operates in the Resen municipality.⁶⁵ According to the interlocutor, this group is well organized, and they have managers whose purpose is to secure buyers, to provide vehicles for log transport from the forest to the consumer. One can infer that from the level of preparedness, this is the work of a highly skilled criminal group. These criminal groups utilize the fact that the demand for logs in the regions of Bitola, Resen and Prilep is higher than the supply.⁶⁶

60. Anonymous Interlocutor C.

61. Anonymous Interlocutor C.

62. Anonymous Interlocutor D, Illegal Logging in Bitola, n.d.

63. Anonymous Interlocutor C, Illegal logging in Bitola.

64. Ibid.

65. Anonymous Interlocutor B, Illegal Logging in Bitola, October 26, 2020.

66. Anonymous Interlocutor B.

Thus, they use the opportunity to illegally log to provide for the citizens and in turn make profit. One of our interlocutors who are professionally engaged in combating illegal logging explained the severity of these groups, their organization and the transnational links: *“These groups are very well organized. They are hierarchical and very well inter-linked to institutional and party structures. At times, when they feel threatened, they can turn violent. Several of my colleagues have been attacked and often injured throughout the years. Additionally, due to our limited resources, especially vehicles, they know that we are patrolling in one area of the region, so they freely log in another, tens of kilometers away...It is not just the illegal logging. Illegal hunting is also an issue. There is a functional criminal link between North Macedonia and Italy through neighboring Albania. Specific species are hunted in the forests around Resen and then smuggled through Albania into Italy where expensive exclusive sausages are prepared and sold.”*⁶⁷ Some interlocutors, that are members of the FP (similarly to Kumanovo) note that the resources available to them are poor. The FP is not supplied with any technical equipment, or even proper uniforms and weapons. Instead, they use outdated weapons which are marked unsafe under European standards.⁶⁸

STRUGA

The Struga region is situated in a picturesque environment. It lies in the plain of the Struga Valley on both banks of the river Crn Drim and on the northern shore of Lake Ohrid. Struga is surrounded by a mountainous area – Jablanica to the west, Karaorman to the north-east and Galichica to the south-east. These breathtaking mountains, with their beautiful hills, forests and valleys, charming villages and clear lakes offer a great variety of breathtaking landscapes and sights. As the aforementioned regions/municipalities, Struga has a serious issue with illegal loggers that excessively log and leave the surrounding forest area destitute. One particularly affected area is the village Vishni, on the mountain Jablanica. About 90% of the wood felled is for heating, while some more serious logging is for the purpose of producing raw technical materials.⁶⁹

One of the interlocutors provided insight that there are private enterprises engaged in logging. While they have a valid logging permit, granted to them by those at the lowest level of the PENF, they excessively log trees that they do not have permission for.⁷⁰ This is done by means of using blank licenses, without a date or time, so the loggers can use it at their convenience. Should they be stopped on the road by the forest or local police, they can fill out the form in such a way, to make it seem as everything has been done according to protocol.⁷¹



A vast majority of the citizens in Struga use wood as a primary heating resource. The PENF and the local subsidiary cannot foster the demand. This is where huge space is created for illegal logging and distribution of illegally logged wood. Furthermore, citizens do not feel the need to report these practices, mainly because they become aware that these criminal groups accommodate their demands for wood faster and cheaper. Oftentimes, they are fooled into believing that they are buying cheaper wood, which is actually not the case.

67. Anonymous Interlocutor B.

68. Anonymous Interlocutor D, Illegal Logging in Bitola.

69. Anonymous Interlocutor A, Illegal logging in Struga, October 27, 2020.

70. Anonymous Interlocutor A; Anonymous Interlocutor B, Illegal logging in Struga, October 27, 2020; Anonymous Interlocutor, Illegal Logging in Struga and Vevchani, October 27, 2020.

71. Ibid.



We encounter these groups frequently. They trespass through the border using illegal paths that the BP cannot guard. They use horses, donkeys, and often jeeps and trucks. They are fast, organized, well-structured criminal organizations. At times they turn violent. We have never managed to catch any of these perpetrators. Sometimes, we manage to confiscate wooden mass, horses, chainsaws or other “leftovers” from the illegal logging.

This type of illegal logging falls under the form of “The Institutionalized”. This is another form of organized criminal illegal logging, which as a model is described in detail below. The forest fund is managed by the PENF, through its subsidiary “Jablanica - Struga”, with a forest area of 22.322,43 ha. In the period from 2010 to 2019, the subsidiary “Jablanica - Struga” has filed a total of 44 criminal charges and 193 misdemeanor charges for illegal logging.⁷² Also, a total of 47 cases of illegal logging by an unknown perpetrator were detected.

One interlocutor notes that their monetary contributions, which should include certain sums for road maintenance, amongst other fees, are non-existent.⁷³ Their only contribution is in the form of paying back those that cover up for them. PENF employees (individual administrative workers, forest engineers etc.) are bribed in return for their silence about the extent to which these private companies conduct their business illegally.⁷⁴

In addition, the interlocutor notes that there are directors in the PENF who often give favored tenders to some private firms, with no experience or expertise, in return for services and favors. The interlocutor confirms that the purpose of logging is to resell it for heating. He vividly explains: *“A vast majority of the citizens in Struga use wood as a primary heating resource. The PENF and the local subsidiary cannot foster the demand. This is where huge space is created for illegal logging and distribution of illegally logged wood. Furthermore, citizens do not feel the need to report these practices, mainly because they become aware that these criminal groups accommodate their demands for wood faster and cheaper. Oftentimes, they are fooled into believing that they are buying cheaper wood, which is actually not the case.”*⁷⁵

One peculiarity for the region of Struga is that parts of the actions of illegal logging are perpetrated by foreigners. Specifically, there are Albanian organized crime groups that illegally log in North Macedonia since in Albania there is a total logging prohibition.⁷⁶ These presumed hierarchical crime groups come into the country with a large entourage of trucks, cars and even horses, which are then loaded up and transported on to the other side of the border.⁷⁷ This is done illegally or with the direct knowledge of the Border Police (BP), which does not confiscate the wood. One of our interlocutors explained their organization and skillfulness in illegal trespassing and logging on the territory of a neighboring country: *“We encounter these groups frequently. They trespass through the border using illegal paths that the BP cannot guard. They use horses, donkeys, and often jeeps and trucks. They are fast, organized, well-structured criminal organizations. At times they turn violent. We have never managed to catch any of these perpetrators. Sometimes, we manage to confiscate wooden mass, horses, chainsaws or other “leftovers” from the illegal logging.”*⁷⁸

One of the ways that the organization of these crime groups is perceived is through

72. Data obtained by the PENF through the Freedom of Information Act.

73. Anonymous Interlocutor A, Illegal logging in Struga, October 27, 2020.

74. Ibid.

75. Ibid.

76. Anonymous Interlocutor, Illegal Logging in Struga and Vevchani.

77. Ibid.

78. Ibid.

their observation of members of the FP and tracking their day-to-day life. The purpose of this is to get to know their schedule so that they can be better prepared for their illicit activities. One interlocutor commented that they have individuals posted on various sides of their usual route, which then inform the illegal loggers of the whereabouts of the FP. If the FP can catch them in the act, what often happens is that they are able to run and escape. This observation was reported to the research team on many occasions in several municipalities during this research. There have been instances, however, when these loggers have been confronted during a raid and became aggressive towards the FP.

In Struga, the researchers met a former employee of the PENF, who spoke openly about the intra-institutional corruption that was present in this state-owned company at the time when he was employed, circa ten years ago.⁷⁹ He mapped the main pathways of corruption: *“You could not engage into illegal logging in Struga and the region without an “Amen” from the top management of the PENF, the leadership of the subsidiary Jablanica-Struga, the FP, as well as the MOI. All state actors needed to be fully “on board” so that illegal logging operations could function smoothly. Every person engaged in the crime ring took his share. At one point, this became such a lucrative “business” that even established criminal groups previously dealing with human trafficking, dealing firearms and drug trafficking, magically switched to illegal logging and illegal distribution of wood mass. There is definitely a lot of cash floating around in this sector”*.⁸⁰ The research team encountered similar descriptions in many of the regions/municipalities in the western part of the country. Yet, this testimony was very bold and straightforward, with this person even willing to speak publicly about malpractices he had encountered in the past.

TETOVO



Several months ago, the MOI, the FP and other state institutions planned to organize a massive raid on illegal loggers in the Tetovo region. Even the Prime Minister was informed, and he encouraged the state institutions to execute a fierce blow to these criminal groups. Allegedly, by the time the MOI special forces were on the way, a leader of one political party directly intervened with high level officials at the MOI, threatening that the Government will not survive this police action, if executed. Both MOI and FP officials were forced to call off the raid.

Tetovo, a city located under the picturesque Shar Mountain is a place where different cultures, religions and people have always entwined. The Municipality of Tetovo covers part of Shar Mountain and is a high mountainous area rich in forests. The beauties of Shar Mountain are hidden in its dense forests, crystal waters of mountain rivers, and emerald depths of its glacial lakes. It is a spectacular beauty with an amazing wealth of hidden gems. Popova Shapka, with an altitude of 1,780 meters, is a popular tourist site on Shar Mountain and one of the most famous winter recreation centers. The western point of the mountain massif, Ljuboten, is the most impressive point due to its pyramid shape, regularly visited by mountaineers and tourists. At the heart of the mountain is Leshnica - a special treasure, with an important geological value and source of the mountain's biodiversity. Shar Mountain is rich in high mountain pastures and high-stemmed coniferous forests, of which the most common are tall fir and spruce.

Moreover, Shar Mountain is home to more than 200 endemic species, which is the highest percentage of

79. Anonymous Interlocutor B, Illegal logging in Struga, October 27, 2020.

80. Ibid.



● Gradecko ezero, Shar Planina

endemism in the country.⁸¹ The most widespread tree species in this area are beech, hornbeam, and oak, which inhabit about 90% of the forest funds.⁸² However, the forest area is declining because of intense logging in the region.

Illegal logging is one of the greatest threats to the forests of the Shar Mountain, as it impairs the quality, structure, and renewal potential, and negatively affects the conservation of biodiversity. There is also an evident unregulated and uncontrolled urbanization. Additionally, the construction of small hydropower plants is a serious environmental problem. As a result of overuse, as well as the use of some inappropriate forestry and agricultural practices, degraded forest structures are found in certain parts of Shar Mountain.⁸³ Degraded forests are usually found in the vicinity of mountain settlements, whereas forests are mainly converted in outcrops, and the most intensive degradation processes are made in the lower regions, amongst oak and beech forest belts.⁸⁴ The illegal logging activities in this area also bring a risk of disturbing the natural processes and the danger of landslides, floods, increased erosion, that have already resulted in deadly disasters. Namely, in August 2015, five people have lost their lives by the flashfloods in the nearby village of Shipkovica, due to the uncontrolled deforestation of Shar Mountain.⁸⁵

The interviewed stakeholders have observed several critical illegal logging hotspots. These include the areas above Ginov Kamen, then Varvara, Jedoarce, Poroj, Kobilica, Vejce, and Mezdracha.⁸⁶

The stakeholders claim that these illegal activities began after the end of the armed conflict in 2001, and from what they observe on the ground, these groups are well organized. The criminal groups largely resemble “The Organization” form of illegal logging, which is described below in rich detail.⁸⁷ The intertwining of criminal structures and representatives of state institutions is vast, and the perception among ordinary citizens is that “nothing much can be done”.⁸⁸ Hikers, mountaineers and ecologists openly speak about motorized chainsaws that are often heard in the areas mentioned above. The

81. UNEP Regional Office Vienna, “Valorization Study for Shar Mountain” (Skopje, Tetovo, 2020), https://www.moepp.gov.mk/wp-content/uploads/2015/01/Studija-za-valorizacija-na-Shar-Planina_konecna-verzija-mart-2020.pdf.

82. UNEP Regional Office Vienna.

83. UNEP Regional Office Vienna.

84. UNEP Regional Office Vienna.

85. Sveto Toevski, “Shipkovica - the place of Macedonian solidarity with the victims,” DW.COM, August 5, 2015, <https://www.dw.com/mk/%D1%88%D0%B8%D0%BF%D0%BA%D0%BE%D0%B2%D0%B8%D1%86%D0%B0-%D0%BC%D0%B5%D1%81%D1%82%D0%BE%D1%82%D0%BE-%D0%BD%D0%B0-%D0%BC%D0%B0%D0%BA%D0%B5%D0%B4%D0%BE%D0%BD%D1%81%D0%BA%D0%B0%D1%82%D0%B0-%D1%81%D0%BE%D0%BB%D0%B8%D0%B4%D0%B0%D1%80%D0%BD%D0%BE%D1%81%D1%82-%D1%81%D0%BE-%D0%BD%D0%B0%D1%81%D1%82%D1%80%D0%50%D0%54%D0%50%D0%5D%D0%58%D1%82%D0%55/a-18628412>

86. Anonymous Interlocutor A, Illegal Logging in Tetovo, November 9, 2020.

87. Anonymous Interlocutor, Environmental Crime and Illegal Logging.

88. Anonymous Interlocutor A, Illegal Logging in Tetovo.

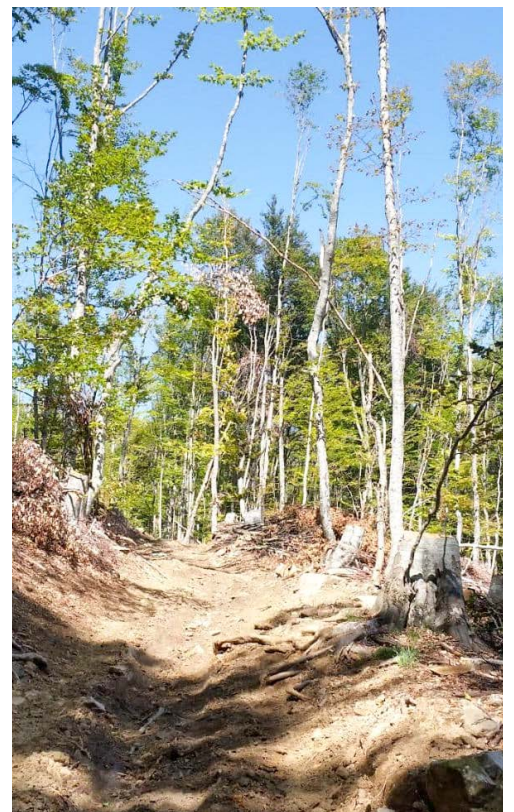
perception is that almost everyone, even the most profound nature lovers seem to have given up on reporting illegal logging, being discouraged by the state institutions and their decentralized branches on local level. One interlocutor even explained the involvement of politics in this organized crime in detail, and the political protection provided to the criminal organizations in the field: *“Several months ago, the MOI, the FP and other state institutions planned to organize a massive raid on illegal loggers in the Tetovo region. Even the Prime Minister was informed, and he encouraged the state institutions to execute a fierce blow to these criminal groups. Allegedly, by the time the MOI special forces were on the way, a leader of one political party directly intervened with high level officials at the MOI, threatening that the Government will not survive this police action, if executed. Both MOI and FP officials were forced to call off the raid.”*⁸⁹ As mentioned previously in other municipalities/regions, there are indications that a solid portion of these illegally obtained funds are used for political party financing. This largely explains the interest that some politicians have to protect organized criminal groups involved in illegal logging.

Tetovo is one of the municipalities where “The Urban Cutters” are very active as well. Significant portions of urban green areas have been cut down in the last several years without any justification, and it is not known where the wood ended up. This is closely linked to the amplified urbanization of the city, which is often conducted without following the legal procedures and buildings without construction permits being erected.

The forest fund is managed by the PENF, through its subsidiary “Leshnica – Tetovo”, with a forest area of 27.289,04 ha. The PE, therefore, is responsible for the protection of the forests from illegal logging, protection from phytopathogenic diseases of plants and open fires, i.e., forest fires that occur during the summers and cause great damage to the forest fund. The subsidiary states that the main problem in preventing and combating illegal logging is insufficient staff and poor working conditions.

Moreover, the FP officers also claim that they do not have the necessary working conditions to perform their duties effectively – there are only 18 FP officers for this region,

89. Anonymous Interlocutor B, Illegal Logging in Tetovo, November 28, 2020.



with only two off-road vehicles,^{90, 91} therefore it is difficult for the FP to take preventive actions in these circumstances. Although the MOI supports the FP in combatting illegal logging, the challenges persist as the perpetrators are often violent and there are reported attacks on the police officers.⁹² In the period from 2010 to 2019, the subsidiary “Leshnica - Tetovo” has filed a total of 141 criminal charges and 382 misdemeanor charges for illegal logging.⁹³ Also, a total of 155 cases of illegal logging by an unknown perpetrator were detected.

Interlocutors complain that illegal loggers often end up with misdemeanor charges and the courts rarely impose adequate fines.⁹⁴ There is a profound disparity in the number of filed charges by the FP and the legal proceedings. Indeed, in the period from 2010 until 2020 a total number of six criminal charges have been filed for deforestation to the PPO in Tetovo, of which four criminal charges were rejected in their entirety, and the two cases that were brought before the court in Tetovo resulted in suspended sentence.⁹⁵ Therefore, it is necessary for the PPO in Tetovo to undertake a proactive role in combatting illegal logging. At the same time, a more coordinated action needs to be taken by the MOI, FP and PENF to counter the devastation of Shar Mountain. Finally, the necessary institutional measures to declare Shar Mountain a NP need to be taken as soon as possible. It is assumed that this measure will substantially decrease the cases of illegal logging, drawing on previous examples from NP “Mavrovo” and NP “Galichica”.

SKOPJE

“

There are four families from Bulachani that are very well organized. They provide wood for the inhabitants of Rashtak, Creshovo, Stajkovci, Smilkovci and Bulachani. Arachinovo also hosts a very well-organized mafia – coordinated, organized, very well networked. They use trucks, jeeps, vans...An average ‘rank-and-file’ logger makes at least 1.500 euros per month.

The capital of the Republic of North Macedonia, Skopje, captivates with its splendor through its numerous cultural, historical, and natural monuments which were established throughout the centuries. The city is surrounded by several mountains, embraced in the serenity of their gale. The southern natural boundary of the city is the mountain Vodno, which further extends to the mountain range Jakupica – Karadjica and Kitka, with its highest peak Solunska Glava, looking far towards the Aegean Sea. To the south-west, the Skopje valley, with its own part, extends as far as the mountains Osoj and Zheden. The northern side of the city is encircled by the magnificent Skopska Crna Gora – a massive and spacious mountain with beautiful sceneries. The mountains in Skopje abound in rich forest funds, mostly deciduous trees (beech, oak, aspen) as well as low-stemmed and shrubby evergreen plants. However, because the illegal

logging in this area is very pervasive, the forests are ruthlessly devastated. The most common hotspots for illegal logging at Skopska Crna Gora lie in the areas above Arachinovo and

90. Zoran Dimovski, “Illegal Loggers Have Devastated the Mountains in Western Macedonia,” Nova TV (blog), September 24, 2014, <https://novatv.mk/drvokradcite-gi-sogolija-planinite-vo-zapadna-makedonija/>.

91. Senad Zilbehari, “Shar Mountain is ‘barren’ - forest police cannot deal with illegal logging, there is not enough staff,” August 9, 2020, <https://mk.tv21.tv/se-sogoluva-shar-planina-shumskata-politsija-ne-mozhe-da-se-spravi-so-nelegalnata-secha-nema-dovolno-kadar/>.

92. A1on, “Two Police Officers Were Injured While Dealing with Illegal Logging Case in Dobroshte,” A1on, February 27, 2019, <https://a1on.mk/macedonia/povredeni-dvajca-policaici-pri-raschistuvanje-nelegalna-secha-na-drva-vo-dobroshte/>.

93. Data obtained by the PENF through the Freedom of Information Act.

94. Zoran Andonov, “Shar Mountain Devastated by Illegal Loggers, the Damage cannot be Compensated even for 60 Years, Residents Say,” Sakam Da Kazham (blog), October 7, 2018, <https://sdk.mk/index.php/dopisna-mrezha/shar-planina-opus-toshena-od-drvokradtsi-shtetata-ne-mozhe-da-se-nadomesti-ni-za-60-godini-velat-zhitelite/>.

95. Data obtained by the PPO - Tetovo through the Freedom of Information Act.

Blace. Kitka and Karadzica are the two other mountains where excessive illegal logging is reported.⁹⁶ Cases of illegal logging are also reported on Mount Vodno, but the forests in this area suffer the most from excessive urbanization and gas pipeline construction.

According to the SSO, the damage from illegal logging in the Skopje region since 2010 amounts to 113.295 m³.⁹⁷ The most severe consequence of illegal logging is soil degradation of the entire mountainous area of Skopska Crna Gora, which causes landslide and frequent flash floods. One of the most devastating flashfloods occurred in August 2016, when concentrated torrential waters from the southern slopes of Skopska Crna Gora caused a large flood wave to the nearby settlement of Chento and the village of Stajkovci.⁹⁸ In addition to the huge material damage, this flood caused 23 human casualties. If illegal logging continues, the mountain will soon become barren, and excessive erosion and torrents will become an even greater threat to the settlements and the population at the footholds.⁹⁹ Moreover, the illegal loggers tend to be violent and aggressive towards forest guards and police officers. Indeed, members of the FP during their duties encounter deadly threats and dangers, and in 2009 a forest guard lost his life during a patrol on Kitka Mountain.¹⁰⁰



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Illegal logging around Skopje is mostly performed by ethnic Albanians, ethnic Boshniaks, ethnic Roma and ethnic Turks. You know...abiding to rule of law works differently in predominantly ethnic Albanian areas...

The researchers spoke to a local inhabitant from the village of Rashtak, situated in Skopska Crna Gora, who himself participates in petty illegal logging, falling under the “Stealing to Survive” form/model. He explained and localized the main criminal groups engaged in illegal logging in the surroundings of Skopska Crna Gora: *“There are four families from Bulachani that are very well organized. They provide wood for the inhabitants of Rashtak, Creshovo, Stajkovci, Smilkovci and Bulachani. Arachinovo also hosts a very well-organized mafia – coordinated, organized, very well networked. They use trucks, jeeps, vans...An average ‘rank-and-file’ logger makes at least 1.500 euros per month.”*¹⁰¹

The forest fund in Skopje is managed by the PENF, through its subsidiary “Karadjica”, with a forest unit area of 63.976,12 ha. In the period from 2010 to 2019, the subsidiary “Karadjica - Skopje” has filed a total of 82 criminal charges and 142 misdemeanor charges for illegal logging.¹⁰² Also, a total of 2.445 cases of illegal logging by an unknown perpetrator were detected. According to interlocutors, the illegal logging activities on Kitka and Karadjica occur constantly, and it is not possible to pass unnoticed.¹⁰³

96. Anonymous Interlocutor, Illegal Logging in Skopje, October 19, 2020.

97. State Statistical Office, 2020.

98. Antonio Krstevski, “(Reportage) Two Years after the Catastrophic Floods in Skopje, Fear Is Still Present!,” 1tv.mk, August 6, 2018, <https://1tv.mk/video/%d1%80%d0%b5%d0%bf%d0%be%d1%80%d1%82%d0%b0%d0%b6%d0%b0-%d0%b4%d0%b2%d0%b5-%d0%b3%d0%be%d0%b4%d0%b8%d0%bd%d0%b8-%d0%bf%d0%be-%d0%ba%d0%b0%d1%82%d0%b0%d1%81%d1%82%d1%80%d0%be%d1%84%d0%b0%d0%bb%d0%bd/>.

99. Krstevski.

100. “Illegal Logging, Corrupt Deals for Personal Gain.”

101. Anonymous Interlocutor A, Illegal Logging in Skopje.

102. Data obtained by the PENF through the Freedom of Information Act.

103. Anonymous Interlocutor B, Illegal Logging in Skopje, October 16, 2020.

Therefore, there is alleged compliance by the forest protection authorities. On the other hand, the subsidiary's forest guards face many obstacles in countering illegal logging – the illegal logging locations are inaccessible, they encounter difficulties in identifying the perpetrators, the forest guards are unarmed and outnumbered by the illegal loggers, while lacking appropriate equipment and usually, they are not able to act quickly and in a coordinated manner with the FP.¹⁰⁴ Also, charges against illegal loggers end up in the drawers of the PPO, or on long waiting lists in court. Namely, since 2010, the PPO in Skopje filed a total number of six criminal charges – four criminal charges were rejected entirely, and four cases were filed after two criminal charges.¹⁰⁵ Therefore, the penalties for illegal logging do not translate into deterrence. This situation not only encourages illegal loggers, but it also has a discouraging effect on FP and forest guards. The officials responsible for safeguarding the forests are tempted to turn a blind eye to crime, or accept petty bribery, and thus spare themselves from a lot of inconvenience.¹⁰⁶ Therefore, there is a necessity of different strategy and approach in combating illegal logging and reducing corruption. Intensive cooperation is needed between these institutions and improved staffing to successfully prevent illegal logging.

The region around Skopje is known to be a stronghold of different forms of organized crime, including illegal logging. Furthermore, political, and ethnic polarization is one of the watermarks of Skopje, resulting with fractions on multiple levels: urban/rural, wealthy/poor, Orthodox Christians/Muslims, Educated/Ignorant, SDSM/VMRO-DPMNE supporters etc. This further contributes to unstable and often fragile inter-ethnic relations.¹⁰⁷ The blame game of “Who cuts more?” we saw in Kichevo is also very present in Skopje and the surrounding areas. Stigmatization towards smaller ethnic communities coming from ethnic Macedonians evidently prevailed during the interviews. As one of the interlocutors explained: *“Illegal logging around Skopje is mostly performed by ethnic Albanians, ethnic Boshniaks, ethnic Roma and ethnic Turks. You know...abiding to rule of law works differently in predominantly ethnic Albanian areas...”*¹⁰⁸ This is yet another indicator that institutional responses to illegal logging can also contribute to tackling other sociological problems, such as the inherent ethno-nationalism.

BEROVO AND PEHCHEVO

Berovo and Pehchevo are situated at the Maleshevo Mountain, in the eastern part of North Macedonia. The Maleshevo Mountain holds yet an unexplored realm of wild beauty. For its dense pine and oak forests and wide green pastures, this region is usually referred as “little Switzerland”. Maleshevo Mountains are surrounded by pine, beech, and oak forests. Through the canopies and the heights of the trees, peaks the Berovo Lake, which gives you a feeling of untouched beauty, worth both seeing and experiencing. Through the sharpness of the mountain wind, the Maleshevo Mountain spreads clean air with the highest concentration of oxygen. In addition to the mountains, the valley of the river Bregalnica is a characteristic of this area, together with the numerous rapids, small cascades, and waterfalls up to 10 m high along the riverbed. However, these forests have been damaged for years through illegal logging. The most pressing hotspots are located near the village Dvorishte and Klepala.¹⁰⁹

104. Anonymous Interlocutor A, Illegal Logging in Skopje.

105. Data obtained by the PPO - Skopje through the Freedom of Information Act

106. Anonymous Interlocutor, Environmental Crime and Illegal Logging.

107. Anonymous Interlocutor C, Illegal Logging in Skopje, October 26, 2020.

108. Anonymous Interlocutor B, Illegal Logging in Skopje, October 16, 2020.

109. Anonymous Interlocutor A, Illegal Logging in Berovo, October 25, 2020; Anonymous Interlocutor B, Illegal logging in Berovo, October 25, 2020; Anonymous Interlocutor, Illegal logging in Pehcevo, October 23, 2020.

Located only 20 km from Berovo, at an altitude of 940 meters, Dvorishte is one of the most beautiful villages in Maleshevo. But behind this seemingly untouched beauty, lies the gloomy image of devastated forests.¹¹⁰ It is argued that the illegal logging in this area is perpetrated by a well-organized group that operates in the Maleshevo region for years. It is estimated that in one or two days, up to 300 m³ trees are harvested.¹¹¹ According to the web-portal “Den”¹¹² the timber is transported with unregistered trucks to the nearby city of Strumica. According to “Den”, there is also involvement of the law enforcement authorities in the illegal logging scheme. Moreover, the interviewed stakeholders have pointed out to the practice of deliberate arson of forest areas, to conduct sanitization of wood.¹¹³ In this manner, illegal timber can be obtained legally. The sanitization area is usually larger, than the originally damaged forest area.



The forests in this region are managed by the PENF through its subsidiaries “Maleshevo”- Berovo, and “Ravna Reka” – Pehchevo, with a total forest land area of 40,007.26 ha. In the period from 2010 to 2019, the subsidiary “Ravna reka - Pehchevo” has filed a total of 2 criminal charges and 39 misdemeanor charges for illegal logging. Also, a total of 411 cases of illegal logging by an unknown perpetrator were detected. Additionally, in the period from 2010 to 2019, the subsidiary “Maleshevo - Berovo” has filed a total of 16 criminal charges and 39 misdemeanor charges for illegal logging.¹¹⁴ In addition, a total of 5214 cases of illegal logging by an unknown perpetrator were detected. According to reports submitted by subsidiaries to the central headquarters of PENF, there are insignificantly small number of criminal charges reported, and the PPO in Berovo has not processed any charges for illegal logging in the past ten years.¹¹⁵ Because there is no inventory and categorization of forest funds, it is difficult to accurately assess the damage caused by illegal logging.¹¹⁶ It seems that despite the excessive logging, the forest funds are recovering. Nevertheless, it is only due to the depopulation of the region.¹¹⁷ In addition to illegal logging, large-scale legal logging is carried out in these areas, to supply firewood to the other cities in the country. Local stakeholders argue that the local population has absolutely no benefit from the exploitation of the forests, hence the low level of awareness.¹¹⁸

110. Anonymous Interlocutor A, Illegal Logging in Berovo.

111. Aleks Todeski, “Desolation in Maleshevo: Organized Group Is Getting Rich through Illegal Logging for Years,” Lokalno, February 28, 2020, <https://lokalno.mk/pustosh-vo-maleshevijata-organizirana-grupa-so-godini-se-bogati-so-nelegalna-se-cha-na-drva/>.

112. The website is inactive, however the articles are also published on the following web pages: <https://standard.mk/makedonija/prodolzhuva-masovnata-secha-vo-maleshevijata-del-od-drvata-se-nosat-na-prodazhba-vo-strumitsa/>; <https://standard.mk/makedonija/nelegalno-isecheni-drva-vo-maleshevijata-se-transportiraat-pred-ochite-na-shumska-ta-i-granichnata-politsija/>; <https://standard.mk/makedonija/masovna-secha-na-drva-vo-maleshevijata-organizirana-grupa-seche-i-po-300-kubni-metri-drva-na-den/>.

113. Anonymous Interlocutor B, Illegal logging in Berovo.

114. Data obtained by the PENF through the Freedom of Information Act

115. Data obtained by the PPO - Berovo through the Freedom of Information Act

116. Anonymous Interlocutor A, Illegal Logging in Berovo.

117. Anonymous Interlocutor, Illegal logging in Pehcevo.

118. Ibid.

The locals are also challenged by other socio-economic problems, the heating season lasts longer, and the firewood provided by the PENF often does not satisfy the populations' needs.¹¹⁹ Serious reforms are needed in the process of firewood supply, as well as education and awareness-raising about the importance of forests and the perils of illegal logging.

GOSTIVAR

Gostivar is rich in history and culture. The city from where the largest river in our country, Vardar starts its flow, the spring Vrutok, is surrounded by the most beautiful mountains Shar Planina, together with neighboring Mount Korab, Bistra and Suva Gora. Near Gostivar is the largest Macedonian NP "Mavrovo". The convenient location, Mount Bistra and the artificial Mavrovo Lake, allow this region to grow into a large tourist center, both in summer and in winter. The mountains in the Gostivar region abound with vast meadows and pastures, immense forests, numerous sheepfolds.

However, the illegal logging practices are widespread in this region, and the Global Forest Watch data indicates that from 2010, Gostivar lost 770.000 ha of tree cover, equivalent to a 3.9%.¹²⁰ The nearby areas of Lakavica, Rechane, Padalishta, Kunovo, Sushica, Zubovce, Jelovce, Chegrane and Forino have been identified as most common illegal logging hotspots in the Gostivar region.¹²¹ Symptomatic for Gostivar is that illegal logging activities are also conducted in the city.¹²² In fact, Gostivar is one of the few cities/areas where "The Urban Cutters" are rather active and inflict major environmental damages and loss to the urban green in the center of the city, which further decreases the quality of life for citizens in the urban areas.

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The first incident took place two weeks ago, when two 60-year-old lindens were cut down by the employees of the local public enterprise. I entered a verbal dispute with the director of the PE. Allegedly, they needed to cut down the two trees to reconstruct the sidewalk. Nonsense. The second incident happened two month ago in the neighborhood Maleardi, when a mini-park of eight 70-year-old pines was completely cut down. The official explanation by the authorities was that the citizens wanted that

One of the interlocutors spoke about two recent incidents, which angered ecologists and activists in Gostivar: *"The first incident took place two weeks ago, when two 60-year-old lindens were cut down by the employees of the local public enterprise. I entered a verbal dispute with the director of the PE. Allegedly, they needed to cut down the two trees to reconstruct the sidewalk. Nonsense. The second incident happened two month ago in the neighborhood Maleardi, when a mini-park of eight 70-year-old pines was completely cut down. The official explanation by the authorities was that the citizens wanted that."*¹²³

This behavior opens several important questions: On which legal grounds are the urban trees cut down? Where does this wood end up? Who benefits from this? Certain testimonies link this attitude of the local self-government to the uncontrolled urbanization of the city center, a malpractice going on for almost two decades in the city.¹²⁴ Corruption, money laundering and illegal construction had already been mapped out as malpractices in Gostivar in previous research

119. Ibid.

120. Global Forest Watch.

121. Anonymous Interlocutor B, Illegal logging in Gostivar, October 13, 2020.

122. Anonymous Interlocutor B.

123. Anonymous Interlocutor A, Illegal logging in Gostivar, October 13, 2020.

124. Anonymous Interlocutor B, Illegal logging in Gostivar; Anonymous Interlocutor C, Illegal Logging in Gostivar, October 13, 2020; Anonymous Interlocutor A, Illegal logging in Gostivar.

endeavors.

The forest fund is managed by the PENF, through its subsidiary “Shar – Gostivar”, with a forest unit area of 27.289,04 ha. In the period from 2010 to 2019, the subsidiary “Shar - Gostivar” has filed a total of 287 criminal charges and 95 misdemeanor charges for illegal logging.¹²⁵ Also, a total of 503 cases of illegal logging by an unknown perpetrator were documented. However, PENF’s reports of damage caused by illegal logging do not match the data from satellite images of the Global Forest Watch. It seems that there is a tendency of relativization of the severity of damage caused by illegal logging. Although the field evidence shows that the illegal logging is widespread in the Gostivar area, these actions are kept silent, swept under the carpet and remain uninvestigated.¹²⁶ This is due to the existence of the so-called forest mafia that operates in the region, which is extremely dangerous.

“

I had all needed permits to transport my logged wood that was properly marked. Yet, they (PENF and FP) did not allow me to. They looked for small procedural shortcomings to prevent me from transporting my own property. At the same time, trucks, and trucks stuffed with wood from my forest were entering Gostivar without any particular problem.

The forest guards and the FP officers do not have the capacity to undertake any significant measures for combating organized crime related to illegal logging.¹²⁷ Following this, the local population is afraid to report these crimes, as illegal loggers often turn violent. However, the main contributing problem to this alarming situation with loggers is the lack of diligence of the judiciary and low penalties for criminal behavior. The mild punitive measures that follow the cases of illegal logging result in impunity and recidivism.¹²⁸

One of the interlocutors spoke about his personal struggle, being a victim of illegal logging. He and his family own a great private forest in a village less than 30 minutes’ drive from Gostivar.¹²⁹ After almost all forests on state-owned land in the vicinity of Gostivar had been destroyed, the perpetrators started trespassing on private property and logged down private forests. His property was and still is the target of these organized criminal groups. He had a strong case in court but lost it due to pressure and corruption in the judicial system.¹³⁰ He also claims that organized criminal groups easily transport wood



● Gorno Jelovce

125. Data obtained by the PENF through the Freedom of Information Act

126. Anonymous Interlocutor D, Illegal Logging in Gostivar, 21.10.2020.

127. Anonymous Interlocutor A, Illegal logging in Gostivar.

128. Anonymous Interlocutor B, Illegal logging in Gostivar.

129. Anonymous Interlocutor A, Illegal logging in Gostivar.

130. Ibid.

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All institutions are involved. If we are three people, for example, one will be responsible to deal with the police, the second with the PENF, and the third with the FP. The idea is to locate corrupt individuals within the institutions that will turn a blind eye on illegal logging or transport of wood and will 'receive' a 'part of the share'. Just imagine – 20, or 200 cases per day. That is a lot of money...



● Peklishte, Suva Gora

from his forest to the city center of Gostivar, while he cannot make use of his own private property: *“I had all needed permits to transport my logged wood that was properly marked. Yet, they (PENF and FP) did not allow*

*me to. They looked for small procedural shortcomings to prevent me from transporting my own property. At the same time, trucks, and trucks stuffed with wood from my forest were entering Gostivar without any particular problem.”*¹³¹

Illegal logging in Gostivar is committed by organized criminal groups that very much resemble “The Organization” model, where the hierarchical structure is closely intertwined with individuals from state institutions. Namely, this was very well described by one interlocutor: *“All institutions are involved. If we are three people, for example, one will be responsible to deal with the police, the second with the PENF, and the third with the FP. The idea is to locate corrupt individuals within the institutions that will turn a blind eye on illegal logging or transport of wood and will 'receive' a 'part of the share'. Just imagine – 20, or 200 cases per day. That is a lot of money...”*¹³² Some estimates show that on “good days”, organizers of illegal logging in Gostivar make a profit of up to 400 euros. This once again shows why there has been interest from established criminal groups to expand their business in the realm of illegal logging.

FORMS OF ORGANIZED CRIME IN ILLEGAL LOGGING IN NORTH MACEDONIA

The interviewed stakeholders have provided insights into the forms and models of organized crime related to illegal logging. Namely, the fact that in order to log forests there has to be a certain level of preparedness, serves as an indicator of a hierarchical order in the organized crime groups. This hierarchical order exists in the sense that there are roles assigned to the group members involved i.e. persons responsible for harvesting, transportation, sale and collecting payments etc., usually supervised by a person who organises the entire illegal logging operation. Additionally, some of the loggers cooperate with corrupt politicians and public servants to generate illicit activities. Hence, the illegal logging appears in several forms:

¹³¹. Ibid.

¹³². Anonymous Interlocutor C, Illegal Logging in Gostivar.

“The Organization”

The first form of organized crimes related to illegal logging involves links between the perpetrators and some members of forest enterprises and the FP. These crimes are usually conducted by small groups (consisting of 5-10 persons), that operate in close coordination with employees of the FP. The competences and jurisdictions of the FP officers allow them to operate both in the forests, on the roads, as well as on private property if there are indications of illegally harvested timber. According to the interlocutors, representatives of the organized criminal groups bribe certain FP employees to conduct illegal logging undisturbed. If the bribes are ineffective, the perpetrators turn violent, and they often attack the FP officers. Once the FP is no longer an obstacle, the illegal loggers bribe the MOI employees. According to our insights, organized criminal groups transport the illegally harvested timber only when “cooperative” MOI employees are on shift. They tend not to engage in violent incidents with the regular police officers, due to their position and reputation in society. Yet, many commanding officers at local level allegedly work in coordination with the MOI officials. The last chain in this criminal group is the representatives of the political parties in power. Certain local and mid-level party officials provide political protection to the perpetrators in return for illegal donations for their political parties, as well as corrupt accumulation of personal wealth.

“The Institutionalized”

The second form of organized crime is closely linked with the planned and legal logging of forests managed by the PENF. The PENF hires subcontractors to operationalize the maintenance of the forests. These economic operators should cut down wood in certain areas, previously flagged by PENF employees. In PENF’s organogram, there are many layers of employees, which are responsible for different phases of the process. By bribing certain individuals, the subcontracted economic operators sometimes exceed the cutting permits damaging the property of PENF. They latter engage with corrupt individuals from the MOI to freely distribute the illegal wood, and sometimes even with the public prosecutors in order not to be prosecuted if a criminal investigation is launched, after the felony has been committed. It must be underlined that corruption in the Public Prosecutor’s Office (PPO) regarding illegal logging is being mentioned rarely and unsystematically. Yet, if one turns to the statistics gathered using freedom of information act it can easily be established that there is a large discrepancy between the criminal charges initiated by the forest authorities and the number of crimes processed by the PPO. Lastly, only several cases in the last ten years have resulted with individuals or groups being penalized by the system for engaging in illegal logging. This points us towards a bottleneck somewhere within the triad: Police-Public Prosecution-Courts.

“Stealing to Survive”

The third form of organized crime is very frequent and omnipresent throughout the territory of the country. Local villagers in mountainous regions organize jointly and engage into illegal logging, trying to earn small amounts of money to fight poverty and survive. They usually offer the wood for very low prices, and in relatively small quantity. These logs rarely reach the urban centers but are being sold either to other locals or in nearby villages. The only two “obstacles” and/or “partners” the locals need to engage with are the FP patrols, or limited PENF staff on duty in some parts of the forests. In some cases, the bribing and “sharing” schemes are very similar to the first form, although on a much lower scale and for smaller amounts of money.

“The Resellers” / “The ‘Second Hand”

The fourth form of organized crime is an extension of the first form, introducing another active subject in the crime ring: the illegal resellers. These individuals/groups buy the illegally cut wood from the illegal loggers and distribute it to the final consumers. This organized criminal activity is mostly conducted in urban and densely populated areas, where final consumers are falsely convinced to think that illegal wood acquired through illegal resellers is cheaper and better in quality. Resellers also often successfully mislead local population, telling them that the PENF had run out of wood, or that prices are three times higher than the one they offer.

“The Urban Cutters”

In a couple of municipalities, the research team encountered testimonies of interlocutors claiming that “old trees” (in excellent condition) are cut by employees in the local communal public enterprises, without any formal decision or any legal act. When environmentalists ask public enterprise employees why certain trees are being cut down, the frequent answer they receive is “we have been told by our superiors to cut these trees”. Interlocutors claim that these trees are cut down with consent from the local governments (i.e., the mayor and the counselors) and there is no track record for where this wood ends up. The official explanation is that these logs are given to “low-income families”, but interviewees also argue that no one has ever provided proof, or a list of recipients of this wood. Interlocutors claim that in some areas, certain representatives of the local government facilitate the illegal sale of this type of wood.

“The Insiders”

Many interviewees pointed out an intra-institutional crime within PENF, in some of its regional offices. The first subject in this crime ring are the private subcontractors hired by the PENF. In coordination with some employees (individuals) of the PENF, they manage to manipulate forest engineers, controllers, the internal control of the company, as well as the FP. This type of operation is mostly conducted by forging paperwork, using small bribes as an instrument to “silence” some PENF employees. The private contractors later bribe certain members of the FP as well, either providing in-kind contributions in wood, or smaller amounts of money. The “scheme” is mainly based on cutting more wood than allowed with the legal logging permits. These companies later easier distribute wood to the end users, mainly because they have the needed paperwork, and are perceived as honest and legitimate economic operators by state authorities.

CONCLUSION AND RECOMMENDATIONS

The research has shown that there are two forms of crimes related to illegal logging – petty illegal logging driven by poverty and involves harvesting firewood for personal use, and illegal logging conducted by organized crime groups that is usually accompanied with a vast array of associated crimes including: linked crimes, revenue crimes, fraud, document forgery, bribery, extortion, and governmental abuse of authority. The interviewed stakeholders have provided insights into the forms and models of organized crime related to illegal logging. Specifically, the fact that to log forests, there needs to be a certain level of preparedness which indicates hierarchical organization of these crime groups, several forms of organized crime related to illegal logging were identified, according to the patterns of organization, cooperation and involvement of public institutions, political actors, and members of local communities.

The research has identified that the forms, causes and drivers of illegal logging in North Macedonia are challenging and complex. Namely, it is argued that there is political-party influence and connection with criminal structures, corruption at low and high levels of government, unprofessional and corrupt behavior of some public servants, which in turn results in distrust in the system. Moreover, the perpetrators often use violent methods, causing fear and intimidation in the local population. This is further exacerbated by the lenient penal policy that allows for recidivism. The victimological aspect is important, and therefore there is a necessity of increased public awareness about negative consequences of environmental crime. Only in that way, including gaining trust in the system, will the citizens be motivated to report crimes. Moreover, it is noted that the organized crime in illegal logging has an international dimension and involves illegal border crossings and smuggling of timber. Therefore, it is necessary to involve the BP in the implementation of any/all measures.

Illegal logging and deforestation are a serious problem that affects all aspects of social life. Therefore, in tackling this issue, a comprehensive approach is needed that will encompass full engagement of the government, state institutions, non-governmental institution, and local population, to suppress these forms of environmental crime. The institutions include the MOI (which has no special department for combating environmental crime), the FP, the State Inspectorate for Environment and Nature (SIEN), but also the BP, the PPO, and the judiciary. Only with effective cooperation of these institutions, through strenuous systematic activity, an effective suppression of this type of crime in the Republic of North Macedonia can be expected.

Namely, realignment of the organization and functional structure and dependence of the FP is needed. Currently, the FP falls under the structure of the MAWFE. Transferring the employees to the BPS will add to relevance, but it will also strengthen its role, position, and resources. The current number of employees is insufficient to successfully protect the forest fund in North Macedonia. Strengthening the internal procedures will minimize the risks for external influence and will result with a much-needed decrease of corruption in the FP. Alongside this, there is a necessity of strengthening the internal procedures in the PENF, including its subsidiaries which will have a two-fold value. The possibilities for intra-institutional mismanagement of resources and corruption will be substantial. The FP should promptly increase its transparency and openness to the public, especially in terms of visibility to the local communities. A designated hotline

number for reporting illegal logging and other devastation of forests needs to be visible and made public.

Realignment of the organizational and functional structure and dependence of the FP is needed. Currently, the FP falls under the structure of the MAFWE. Transferring the employees to the BPS of the MOI will add to relevance, but it will also strengthen the role, position and resources of the FP. This should substantially improve the fight against organized crime in illegal logging. While systemic organizational and institutional reforms are being implemented, the FP needs to be immediately strengthened in several areas:

- Human resources: The FP needs many employees that are going to be relatively young, physically fit, and professionally trained and dedicated to protecting the forests. The current number of employees is insufficient to successfully protect the forest fund in North Macedonia;

- The remuneration of the forest policemen needs to be increased immediately, to provide minimum dignified lifestyle, but also decrease the possibility for corruption and making concessions to organized criminal groups. All benefits, overtime hours, night shifts and additional rights stemming from the policemen's working contracts need to be fully respected;

- New equipment including vehicles, uniforms, sufficient footwear, weaponry, and accessories that will provide additional advantage against the perpetrators (night vision goggles, drones, motion cameras, etc.) should be bought and distributed to forest policemen as soon as possible;

- All current and new employees in the FP need to undergo complete professional training that will increase their physical and cognitive traits in the fight against organized crime.

Strengthening the internal procedures in the PENF, including the subsidiaries, will have a two-fold value:

- The possibilities for intra-institutional mismanagement of resources and corruption will be substantial.

- The process of digital registration of logged wood will be enhanced, and this will contribute to better control over the numerous employees at this state-owned company. The chances for manipulation can be substantially decreased.

Strengthening the internal procedures in the FP and clarification of the roles, competencies and organization of the internal control will minimize the risks for external influence and will result with a decrease of corruption in the FP. The FP should promptly increase its transparency and openness to the public, especially in terms of visibility to the local communities. A special hotline number for reporting illegal logging and other devastation of forests in each local office of the FP needs to be visible and made public. This will increase the cases of reported illegal logging throughout the country.

Moreover, there is a lack of cooperation between the competent authorities, even a case of rivalry between the FP and the MOI, more precisely which competent authority should act in cases of forest deforestation. This problem of stakeholder cooperation is very serious because if there is no synchronized, joint, continuous, and effective cooperation between all competent authorities, there will be no effective suppression of crime. Therefore, as one of the necessary measures in the coming period, we propose the establishment of NEST - National Environmental Security Task Force (a concept of Interpol). According to this concept, a joint body should be established for coordination of all competent entities that would be part of this joint network as follows: Police, Cus-

toms, Environmental Agencies, other competent agencies, Public Prosecutor's Office, NGOs, and others. Only in that way will all stakeholders and decision makers unite to effectively combat environmental crime in the country, because they will be directed to effective cooperation. State and non-state actors alike, should do everything within their competencies and possibilities to increase awareness against illegal logging on local level, by closely working with communities and community leaders. The pressing issue of illegal logging needs to be frequently discussed by the Local Prevention Councils (LPCs). In this manner, illegal logging will receive the needed recognition as a serious local issue on multiple locations.

Civil society organizations must work more on awareness-raising on community level, in order to increase the knowledge of citizens regarding the devastating effects from illegal logging.

Non-state actors are encouraged to engage in greater monitoring of the work of state institutions responsible for forest management and protection. These activities will put further pressure over institutions to be more transparent, efficient and effective.

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