

Policy Brief

**Data availability  
and quality, policies,  
institutions, and  
legislation relevant  
for woody biomass -  
a snapshot of Serbia and  
Bosnia and Herzegovina**

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*Belgrade, Serbia -  
March, 2024*

**Data availability and quality, policies, institutions, and legislation relevant for woody biomass - a snapshot of Serbia and Bosnia and Herzegovina - Policy brief**

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This brief is the last of four briefs prepared within the framework of project ***„Woody biomass: win-win or lose-lose? Energy, climate and air pollution effects of biomass to power projects in the context of selected Western Balkan countries.“***

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This project, prepared and implemented by the RES Foundation, is supported by the Heinrich Boell Foundation, Office in Belgrade. Attitudes and opinions expressed in this report are solely the views of the authors, and do not necessarily represent the views of the project's donors.



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# INTRODUCTION

In the [third](#) publication out of four that are prepared within the project „Woody biomass: win-win or lose-lose? Energy, climate and air pollution effects of biomass to power projects in the context of selected Western Balkan countries“ we argued that the biomass for energy is a contentious but unavoidable policy issue in the Western Balkans. We quoted the most recent Joint Research Centre of the European Commission analysis in which policymakers and scientists recognize that diverging values, worldviews, and ethical perceptions of natural resources and their management are a core part of the debate. We shared the views of the authors who claimed that these will not be solved by more scientific research, because science is a social endeavour where value-choices and judgements are inevitable.

## The ways to see the forest

### [WWE](#)

Forests are home to more than half of all species found on land, a rich variety of life that keeps many of our most vital natural systems running – from keeping our climate stable by absorbing carbon dioxide and releasing oxygen, to regulating our water supply and improving its quality. Over one billion people live in and around forests and depend on them for fuel, food and medicines. And all of us use wood in our daily lives, from the chair we sit on to the paper we use.

### [FAO](#)

Land spanning more than 0.5 hectares with trees higher than 5 meters and a canopy cover of more than 10 percent, or trees able to reach these thresholds in situ. It does not include land that is predominantly under agricultural or urban land use.



## FOREST:

- Is determined both by the presence of trees and the absence of other predominant land uses. The trees should be able to reach a minimum height of 5 meters in situ.
- Includes areas with young trees that have not yet reached but which are expected to reach a canopy cover of 10 percent and tree height of 5 meters. It also includes areas that are temporarily unstocked due to clear-cutting as part of a forest management practice or natural disasters, and which are expected to be regenerated within 5 years. Local conditions may, in exceptional cases, justify that a longer time frame is used.
- Includes forest roads, firebreaks and other small open areas; forest in national parks, nature reserves and other protected areas such as those of specific environmental, scientific, historical, cultural or spiritual interest.
- Includes windbreaks, shelterbelts and corridors of trees with an area of more than 0.5 hectares and width of more than 20 meters.
- Includes abandoned shifting cultivation land with a regeneration of trees that have, or are expected to reach, a canopy cover of 10 percent and tree height of 5 meters.
- Includes areas with mangroves in tidal zones, regardless whether this area is classified as land area or not.
- Includes areas outside the legally designated forest land which meet the definition of "forest".

It is undisputable that forests are life, life largely bred by people that provide for numerous essential private and public goods to individuals, communities, societies, and the mankind. Learning more about forests and the ways we use them, clarifying and agreeing on arrangements for their future role, its use or non-use is essential for our economies and society. We hope that this brief will help institutions and individuals in Serbia and Bosnia and Herzegovina to learn more, clarify more and agree to larger extent on the critical aspects for the use of forests in these countries. Currently, we still do not know enough.



## EXECUTIVE SUMMARY

According to the energy balances citizens burnt around 6.5 millions of tonnes of fuel wood in Bosnia and Herzegovina and Serbia in 2021. Inefficient and polluting burning in substandard devices provides a vast majority of biomass energy that constitutes 63% of all energy used in households in Bosnia and Herzegovina and 40% in Serbia. Only three years ago according to the energy balances less than 5 millions of tonnes were burned in Bosnia and Herzegovina and Serbia while four years ago around 3 millions of tonnes of the wood was burnt. In both countries, these figures have been growing in different periods of time. At the same time, we have not changed our energy practices so dramatically, we have changed the way we collect and interpret data. Also, the wood energy is not used for electricity production. It accounts for 2% of heat production in district heating in Serbia and for 20% of heat production in relatively modest volume of district heating services in Bosnia and Herzegovina.

In 2024, forests cover more than 50% of the territory of Bosnia and Herzegovina (and both entities) and more than 39% of the territory of Serbia. Yet, we do not have sufficiently good quality of information about our forests, and we communicate poorly what we know. This additionally impacts the low level of trust in data and policies.

In November 2023, the freshly published findings of the Second National Forest Inventory in Serbia showed that there is 7,000 additional square kilometres of forest area. This represents the 10% of the territory that needs to be covered by our policies. The major finding is that there is 54% more wood in the forests than previously thought and that the annual yields are 58% higher. These new, significantly different data, arrived in time to feed into the development of strategic frameworks that are critical for life in the country as Serbia does not currently have a valid Development Plan, valid Spatial Plan, and valid Program for Forestry Development, despite the legal requirements. The Second National Forest Inventory of Bosnia and Herzegovina was conducted in the period 2006–2009. Although the collected data are used, they have not been published and there is a need for a new inventory.

What is known and undisputable is that coppice forests grow on more than 2.5 million hectares in both countries, and that the annual increments of coppice forests are much lower than those of natural or artificial high stands. According to the Forest Inventory coppice forests occupy 1.86 million ha in Serbia which represents the two thirds of all forest areas. The Statistical Offices of Entities in Bosnia and Herzegovina report on 670,000 ha of coppice forests, excluding the data for privately owned forests in the Federation of Bosnia and Herzegovina. Barrens and mine areas cover 25% of forest area in Federation of Bosnia and Herzegovina.



There is a significant private forests coverage in Serbia that accounts for 58% of forest area. In the Republic of Srpska private forests account for 28% of forest area and 18% in the Federation of Bosnia and Herzegovina. At the same time, the average annual growth increments in private forests are lower than those in the state forests.

The legislation in Serbia and in the Republic of Srpska frames the planning processes in forestry sector and prescribes the tools for management of both state-owned and privately owned forests. The Law on Forests of Federation of Bosnia and Herzegovina from 2002 was repealed in 2009. Since then, the forestry sector has been functioning for years through the implementation of cantonal laws on forests. To reach a compromise and satisfy numerous interest groups, the solution is to adopt an umbrella Law on Forests in which the criteria of sustainable forest management would be clearly recognized and represented.<sup>1</sup>

Sectoral strategic documents are under development in both the Federation of Bosnia and Herzegovina and Republic of Srpska. Since the results of the new Forest Inventory are known in Serbia, it is the time for Serbia to finally develop the Program for Forestry Development that would replace the outdated Strategy for the Forestry Development adopted in 2006. Overall, the development of strategic level documents whether strategies or programs have been challenging, while at the same time the forests are being utilized.<sup>2</sup> There is a sense of urgency when it comes to the development of a strategic framework and the direction of forestry sector that is based on recent data for all mentioned countries/entities. This is even more important considering the forest policy dynamics at the EU level including interaction with the related policy areas such as climate change, biodiversity, energy.

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1 <https://seerural.org/wp-content/uploads/2022/12/Sustainable-forest-management-in-the-western-balkan-region.pdf>

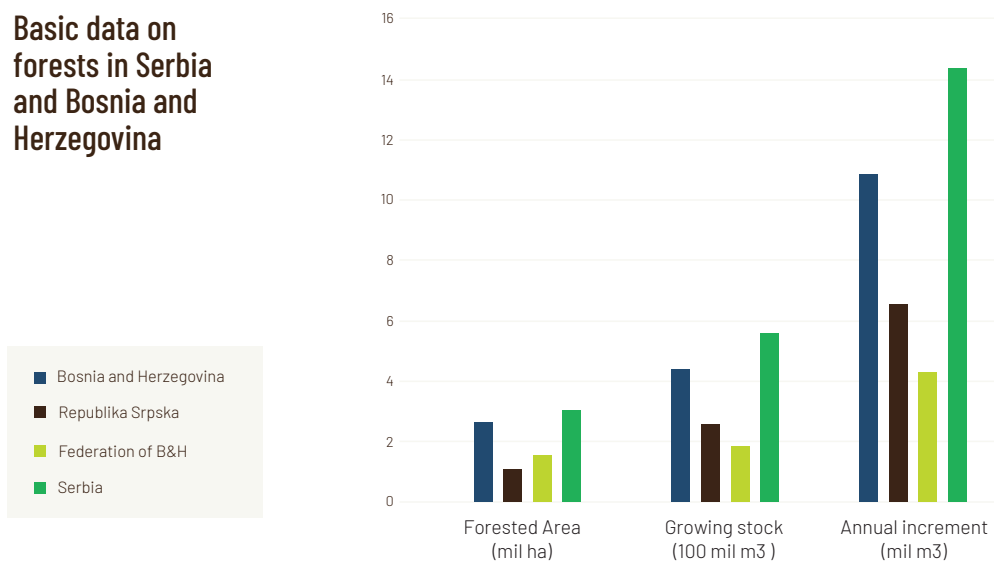
2 <https://seerural.org/wp-content/uploads/2022/12/Sustainable-forest-management-in-the-western-balkan-region.pdf>



# DATA ON FORESTS

Forests and forest land cover more than a half of the territory of Bosnia and Herzegovina and its entities and almost 40% of the Republic of Serbia. Quality of institutional and policy framework in both countries needs to be substantially improved to secure that major parts of the territories are used in a way that enables sustainable development of the countries. Data on forested area, growing stock and annual increments are presented in the *Figure 1*. In the Republic of Srpska, it is assumed that the actual forest cover is higher, mainly because the private forests are not inventoried on parcels that are not classified as “forest” in the cadastral classification of land.<sup>3</sup>

## Basic data on forests in Serbia and Bosnia and Herzegovina



**Figure 1** Basic data on forests in Serbia and Bosnia and Herzegovina. Sources: Sustainable forest management in the Western Balkan region, GFA,<sup>4</sup> Statistical Bulletin- Forestry 2022, Statistical Office of Federation of Bosnia and Herzegovina,<sup>5</sup> Bulletin – Forestry 2023, Statistical Office of the Republic of Srpska<sup>6</sup> Results of National Forest Inventory of the Republic of Serbia.<sup>7</sup>

3 <https://seerural.org/wp-content/uploads/2022/12/Sustainable-forest-management-in-the-western-balkan-region.pdf>

4 <https://seerural.org/wp-content/uploads/2022/12/Sustainable-forest-management-in-the-western-balkan-region.pdf>

5 <https://docs.google.com/gview?url=http://fzs.ba/wp-content/uploads/2023/12/Sumarstvo-2022.pdf>

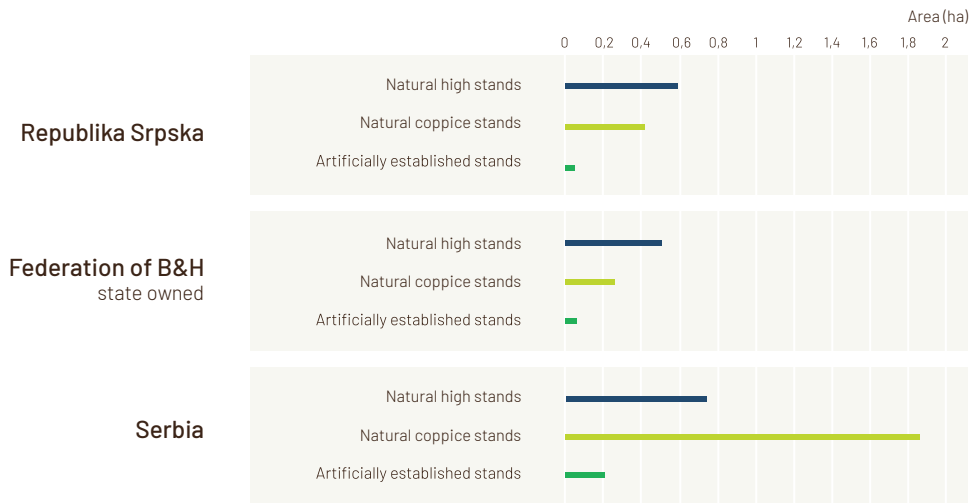
6 [https://www.rzs.rs.ba/static/uploads/bilteni/sumarstvo/Bilten\\_Sumarstva\\_2023\\_WEB.pdf](https://www.rzs.rs.ba/static/uploads/bilteni/sumarstvo/Bilten_Sumarstva_2023_WEB.pdf)

7 <https://upravazasume.gov.rs>



Natural coppice stands occupy around two thirds of forested area in Serbia. In the Republic of Srpska 22% of all forests are coppice forests while in the state-owned forests of Federation of Bosnia and Herzegovina this share is 21%.

### Forest area by type od stand origin



**Figure 2** Forest area by type od stand origin. Sources: Statistical Bulletin- Forestry 2022, Statistical Office of Federation of Bosnia and Herzegovina,<sup>8</sup> Bulletin - Forestry 2023, Statistical Office of the Republic of Srpska,<sup>9</sup> Results of National Forest Inventory of the Republic of Serbia.<sup>10</sup>

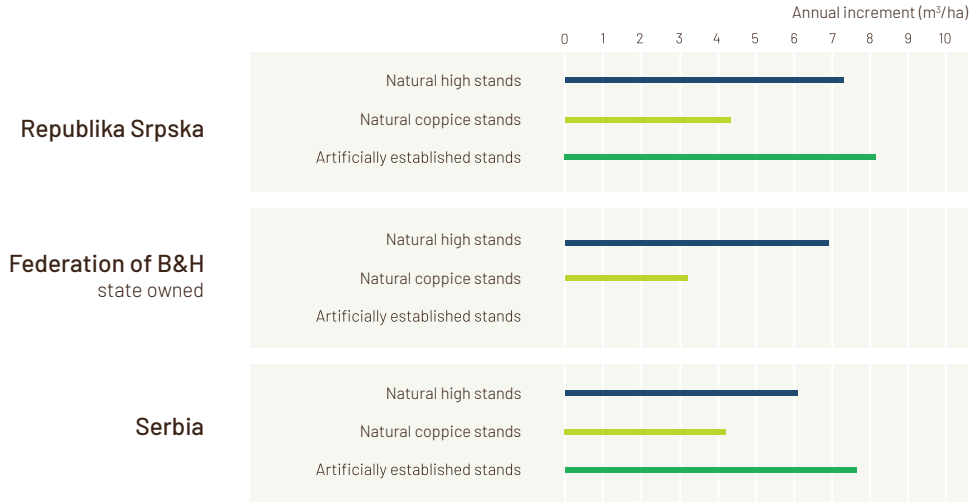
Productive and unproductive barrens and mine areas occupy in addition around one third of all forested area in the state-owned forests in Bosnia and Herzegovina. Annual increments in coppice forests are lower than in natural high stands or artificial high stands as shown in Figure 3.

8 <https://docs.google.com/gview?url=http://fzs.ba/wp-content/uploads/2023/12/Sumarstvo-2022.pdf>

9 [https://www.rzs.rs.ba/static/uploads/bilteni/sumarstvo/Bilten\\_Sumarstva\\_2023\\_WEB.pdf](https://www.rzs.rs.ba/static/uploads/bilteni/sumarstvo/Bilten_Sumarstva_2023_WEB.pdf)

10 <https://upravazasume.gov.rs>

### Forest annual increments by type of stand origin



**Figure 3** Forest annual increments by type of stand origin. Sources: Statistical Bulletin- Forestry 2022, Statistical Office of Federation of Bosnia and Herzegovina,<sup>11</sup> Bulletin - Forestry 2023, Statistical Office of the Republic of Srpska,<sup>12</sup> Results of National Forest Inventory of the Republic of Serbia.<sup>13</sup>

According to the available data annual increments are lower in private forests than in state owned forests. There is a significant private forests coverage in Serbia that accounts for 58% of forest area. In the Republic of Srpska private forests account for 28% of forest area and 18% in Federation of Bosnia and Herzegovina.

#### Private forest owners in Serbia

It is estimated that there are between 500,000 and 800,000 private forest owners in Serbia owning around 3,900,000 parcels. It was estimated that more than 61% of properties is smaller than 3 ha. Large number of owners with small properties and small economic importance prevents articulation of a common interest at higher level than today. Without association of private forest owners, almost 50% of the forest area is left without a contact point for forest policy development and implementation.

<sup>11</sup> <https://docs.google.com/gview?url=http://fzs.ba/wp-content/uploads/2023/12/Sumarstvo-2022.pdf>

<sup>12</sup> [https://www.rzs.rs.ba/static/uploads/bilteni/sumarstvo/Bilten\\_Sumarstva\\_2023\\_WEB.pdf](https://www.rzs.rs.ba/static/uploads/bilteni/sumarstvo/Bilten_Sumarstva_2023_WEB.pdf)

<sup>13</sup> <https://upravazasume.gov.rs>



In November 2023, the freshly published findings of the Second National Forest Inventory in Serbia showed that there is 7,000 additional square kilometres of forest area. This represents the 10% of the territory that needs to be covered by the public policies. The major finding is that there is 54% more wood in the forests than previously thought and that the annual yields are 58% higher. Such major changes in forestry related numbers clearly show the immense importance of regular and a good quality data collection.

**Table 1** Area, growing stock and annual increments of Serbian forests- data from subsequent inventories<sup>14 15</sup>

	Area (ha)	Stock (m <sup>3</sup> )	Annual Increment (m <sup>3</sup> )
2009 inventory	2,252,400	362,487,418	9,079,772
2023 inventory	3,025,471	556,971,157	14,329,501
Percent change	34%	54%	58%

These new, significantly different data, arrived in time to feed into the development of strategic frameworks that are critical for the life in the country as Serbia does not currently have a valid Development Plan, valid Spatial Plan, and valid Program for Forestry Development, despite the legal requirements. It is also important to communicate data to all interested parties and the public as discussions around forestry tend to be contentious. Given the low level of trust we may end up blocking policies that could be optimal for numerous stakeholders as it is difficult to reach an agreement on the rights mix of policies.

<sup>14</sup> <https://upravazasume.gov.rs/wp-content/uploads/2015/12/The-national-forest-inventory-of-the-Republic-of-Serbia-1.pdf>

<sup>15</sup> [https://upravazasume.gov.rs/wp-content/uploads/2023/12/Complete\\_Results\\_Serbia\\_27-11-2023.xlsx](https://upravazasume.gov.rs/wp-content/uploads/2023/12/Complete_Results_Serbia_27-11-2023.xlsx)



### **Communicating the data: the case of Agricultural census in Serbia**

Statistical office of the Republic of Serbia [published](#) the first data of the Agricultural census held in 2023 on 30th January 2024. The census also takes stock of the forests owned by registered agricultural holdings. For different reasons forested area owned by registered agricultural holdings was 48.2% lower than forested area owned by registered agricultural holdings captured by snapshot survey in 2018.

A major media outlet interpreted the first census data with the title "[Serbia lost 48.2% of its forests in five years](#)". Media and social networks exploded. Only after a month the Statistical Office [as a reply to question from other news agency explained](#) that a) the drop does not refer to the entire Serbian forests and b) the drop is primarily methodological as numerous former agricultural holdings owning large forested areas have changed their legal status and have not been covered by the census. In its reply, the Statistical Office referred to the forestry data albeit ignoring the fact that only three months ago the fresh inventory data revealed significantly different figures.

# ENERGY

According to the energy balances citizens burnt around 6.5 millions of tonnes of fuel wood in Bosnia and Herzegovina and Serbia in 2021. Only three years ago according to the energy balances less than 5 millions of tonnes were burned in Bosnia and Herzegovina and Serbia while four years ago we around 3 millions of tonnes of the wood were burnt. These significant changes do not come from changed practices. We have changed the way we collect and interpret data.

## Total primary energy supply from biofuels in Serbia and Bosnia and Herzegovina 2017-2021 (TJ)

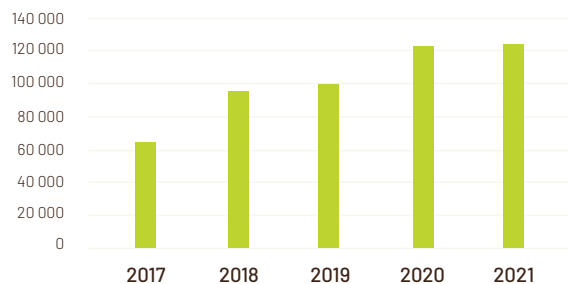


Figure 4 Total primary energy supply from biofuels in Serbia and Bosnia and Herzegovina 2017-2021(TJ). Source: IEA

Inefficient and polluting burning in substandard devices provides a vast majority of biomass energy that constitutes 63% of all energy used in households in Bosnia and Herzegovina and 40% in Serbia.

In the [first](#) publication out of four that are prepared within the project „Woody biomass: win-win or lose-lose? Energy, climate and air pollution effects of biomass to power projects in the context of selected Western Balkan countries” we discussed efficiency and emissions of devices.<sup>16</sup> In the [third](#) publication we have recommended to implement, in the shortest possible time, the eco-design requirements for local space heaters using solid fuels and implement a massive change-out scheme of technically obsolete devices. Meanwhile, the Republic of Serbia adopted the Rulebooks on Eco-Design Requirements for Local Space Heaters Using Solid Fuels<sup>17</sup> and for Boilers Using Solid Fuels.<sup>18</sup> The Rulebooks have to be implemented only from January 1st, 2026 providing that the market surveillance is legally defined and capacitated to perform required controls. Currently, this is not the case.

<sup>16</sup> Pages 16 and 17

<sup>17</sup> <https://mre.gov.rs/extfile/sector/sr/269/0/Prav%20eko-diz%20lok%20grej%20na%20cvrsto%20gorivo-27dec2023.docx.pdf>

<sup>18</sup> <https://mre.gov.rs/extfile/sector/sr/268/6/Pravilnik%20o%20zahtevima%20eko-dizajna%20za%20kotlove%20na%20cvrsto%20gorivo.pdf>



The wood energy is not used for electricity production. It accounts for 2% of heat production in district heating in Serbia and for 20% of heat production in relatively modest volume of district heating services in Bosnia and Herzegovina. Basic figures on bioenergy in Serbia and Bosnia and Herzegovina are presented in *Figure 5* and *Figure 6*.

### Bioenergy in SERBIA in 2021

biofuels and waste account for **16%** of total domestic **energy production** (third largest)

primary solid biofuels account for **40%** of all residential **energy consumption** (single largest share)

biofuels and renewable waste accounted for **1%** of domestic **electricity supply**

biofuels and renewable waste accounted for **2%** of all (district) **heat supplied**

Figure 5 Bioenergy in Serbia in 2021. Source: IEA<sup>19</sup>

### Bioenergy in BOSNIA AND HERZEGOVINA in 2021

biofuels and waste account for **28%** of total domestic **energy production** (second largest after coal)

primary solid biofuels account for **63%** of all residential **energy consumption**

biofuels and renewable waste accounted for **0.30%** of domestic **electricity supply**

biofuels and renewable waste accounted for **20%** of all (district) **heat supplied** (second largest share following natural gas)

Figure 6 Bioenergy in Bosnia and Herzegovina in 2021. Source: IEA<sup>20</sup>

19 <https://www.iea.org/data-and-statistics/data-tools/energy-statistics-data-browser?country=WORLD&fuel=Energy%20supply&indicator=TESbySource>

20 <https://www.iea.org/data-and-statistics/data-tools/energy-statistics-data-browser?country=WORLD&fuel=Energy%20supply&indicator=TESbySource>



# LEGAL, INSTITUTIONAL, AND STRATEGIC FRAMEWORK

The architecture of institutional framework of forestry sector in the Federation of Bosnia and Herzegovina, Republic of Srpska and Republic of Serbia is similar and hierarchically governed by a ministry and a specialized administrative sector for forestry. In Bosnia and Herzegovina direct competences in forestry are held at the level of entities. The institutions at these levels are responsible for forest policymaking, for forest legislation and law implementation.

**Table 2** Institutions governing the forest sector in FB&H<sup>21</sup>, Republic of Srpska<sup>22</sup> and Republic of Serbia<sup>23</sup>

Country/Entity	Institution	Department/Section
FB&H	Ministry of Agriculture, Water Management and Forestry	Sector for Forestry and Hunting
		Sector for Forest Protection and International Commitments
		Federal Forest Office
Republic of Srpska	Ministry of Agriculture, Forestry and Water Management	Sector for Forestry and Hunting
Republic of Serbia	Ministry of Agriculture, Forestry and Water Management	Forest Directorate

There is a mixed situation at the national level related to the strategic documents which govern and regulate the forestry sector. In Bosnia and Herzegovina there is no national forest policy and the responsibility for preparing the forest policy and strategy lays with the two entities. The Forestry Program of the Federation of Bosnia and Herzegovina (FB&H) was initially drafted in 2009 and composed of a general and an implementation part. However, it is still not fully adopted. Its section on general objectives was adopted in 2017 and progress has been recorded since this period. As we write we can say that the data are outdated, and it is necessary to update the studies and collect new data in order to get an overview of the current situation in the FB&H forestry sector.<sup>24</sup> In the Republic of Srpska, the Forestry

<sup>21</sup> <https://fmpvs.gov.ba/federalna-uprava-za-sumarstvo/>

<sup>22</sup> <https://vladars.rs/sr-SP-Cyrl/Vlada/Ministarstva/mps/DJEL/Pages/Splash.aspx>

<sup>23</sup> <https://upravazasume.gov.rs>

<sup>24</sup> <https://fmpvs.gov.ba/sumarstvo-i-lovstvo-propisi/>



Development Strategy was adopted in 2011, and it expired in 2021.<sup>25</sup> The new one for the period 2022-2032 has been in the process of preparation. In the Republic of Serbia, the Forestry Development Strategy was adopted in 2006.<sup>26</sup> This document is not only outdated but also redundant. With the adoption of the new Law on Planning System<sup>27</sup> and the Law on Forests<sup>28</sup> in 2018 it is required to develop a Program for this policy sector.

**Table 3** Strategic documents of forestry sector in in FB&H, Republic of Srpska and Republic of Serbia

Country/Entity	Strategic Plan	Adoption/Relevance	Current Status
FB&H	Forestry Program of the Federation of Bosnia and Herzegovina	In the draft since 2009, main objectives adopted in 2017, outdated	Necessary collect new data to get an overview of the current situation in the FB&H forestry sector and update the main goals
Republic of Srpska	Forestry Development Strategy	2011-2021	New Strategy for the period 2022-2032 has been in the process of preparation
Republic of Serbia		Adopted in 2006 with no expiry date, some strategic goals still relevant, outdated	Phased-out as a strategic document, the laws from 2018 require development of the sectoral program which status is unknown

Overall, the development of strategic level documents whether strategies or programs has been challenging, while at the same time the forests are being utilized.<sup>29</sup> There is a sense of urgency when it comes to the development of a strategic framework and the direction of forestry sector that is based on recent data for all mentioned countries/entities. This is even more important considering the forest policy dynamics at the EU level including interaction with the related policy areas such as climate change, biodiversity, energy.

When it comes to the sustainable forest management certification scheme Forest Stewardship Council (FSC) it is worth mentioning that although B&H do not have an adopted set of national criteria and indicators for sustainable forest management, B&H is a unique country in the region by the fact that it has adopted a national FSC standard for sustainable forest management. In addition to this, all forests in Serbia that are managed by public enterprises for forest management are certified within the FSC scheme, that considers different aspects, including biodiversity. Independent evaluators are in charge of FSC in their annual report, evaluating if forest management is in accordance with the FSC criteria.<sup>30</sup>

25 <https://vladars.rs/sr-SP-Cyrl/Vlada/Ministarstva/mps/министарство/Documents/Strategija%20razvoja%20sumarstva.pdf>

26 <https://upravazasume.gov.rs/wp-content/uploads/2015/12/Strategija-razvoja-sumarstva.pdf>

27 <https://www.paragraf.rs/propisi/zakon-o-planskom-sistemu-republike-srbije.html>

28 <https://www.paragraf.rs/propisi/zakon-o-sumama-republike-srbije.html>

29 <https://seerural.org/wp-content/uploads/2022/12/Sustainable-forest-management-in-the-western-balkan-region.pdf>

30 <https://adria-balkan.fsc.org/sr/fsc-u-adria-balkan-regionu/bih>





## Federation of Bosnia and Herzegovina

The situation in the forestry sector in this entity is complex and almost chaotic as there is no Law on forests. The forest sector of FB&H has not been legally regulated since 2009, when the Law on Forests of FB&H from 2002 was repealed by the Constitutional court. The last National inventory of forests developed between 2006 - 2009 has never been published.<sup>31</sup> Despite the fact that there is no law on forests in FB&H, the forestry sector has been functioning for years through the implementation of cantonal laws on forests. To reach a compromise and satisfy numerous interest groups, the solution is to adopt an umbrella (federal) Law on Forests in which the criteria of sustainable forest management would be clearly recognized and represented.<sup>32</sup> The new Law on Forest is in the draft and at the moment at the public consultation procedure.<sup>33</sup> It is expected that the new Law will trigger the preparation of the updated forest inventory that could serve to develop a new strategic framework and program.

At the FB&H level, there is a Forestry Department within the Ministry of Agriculture, Water Management and Forestry which comprises of three different units. The first is a Forestry and hunting sector with responsibilities for all legal aspects relating to forest law and related legislation. It acts as a permission awarding unit, e.g., is in charge of land use and forest management planning. The second one is Forest Protection and International Commitments Sector. The third one is the Federal Forest Office that is responsible for forest silviculture and protection, users of forest and subsidies and support payments for forestry, as well as the development and monitoring of processes in forestry including an overall monitoring role in relation to activities within the forest sector.<sup>34</sup>

The FB&H Forest Inspection performs overall inspection services safeguarding the implementation of all actions relating to the law on forests within FB&H.<sup>35</sup> At the Cantonal level, the Ministry of Agriculture, Water Management and Forestry holds the responsibility for forest resource management, except in Sarajevo Canton, Zapadno-Hercegovački Canton and Bosansko-Podrinjski Canton where FB&H devolved its management competencies to the cantonal governments. Each Canton has competencies over the forest resources within its administrative boundaries. In this respect, further important bodies are: Cantonal Forest Office and the Cantonal Forest Inspection.

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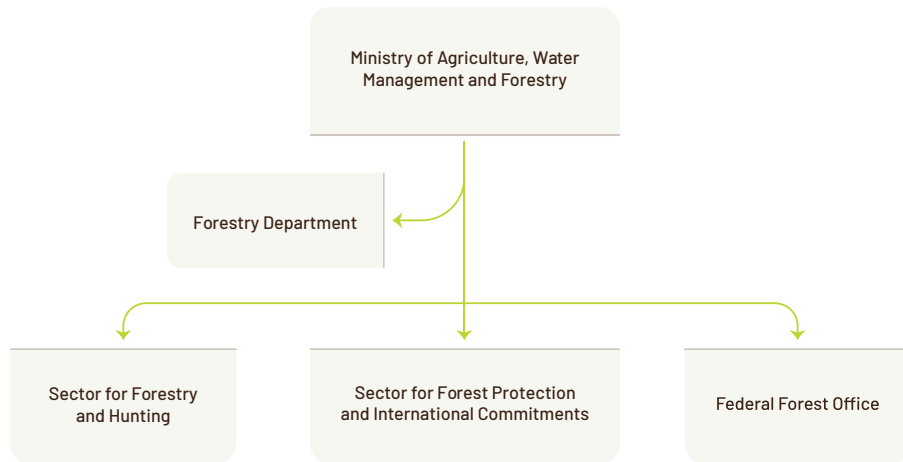
31 [https://fmpvs.gov.ba/wp- and the implementation of the concluded Agreement with the Public Forestry Enterprise "Forests of the Republic of Srpska" JSC Sokolac. content/uploads/2020/09/informacija-o-gospodarenju-sumama-2019-2020\\_28aug2020.pdf](https://fmpvs.gov.ba/wp- and the implementation of the concluded Agreement with the Public Forestry Enterprise )

32 <https://seerural.org/wp-content/uploads/2022/12/Sustainable-forest-management-in-the-western-balkan-region.pdf>

33 <https://fmpvs.gov.ba/2024/02/20/javna-rasprava-o-zakonu-o-sumama-u-federaciji-bih/>

34 <https://fmpvs.gov.ba/federalna-uprava-za-sumarstvo/>

35 <https://fuzip.gov.ba/unutrasnja-organizacija/federalni-sumarski-inspektorat/>



**Figure 7** The organizational structure of the forestry sector in Federation of Bosnia and Herzegovina<sup>36</sup>

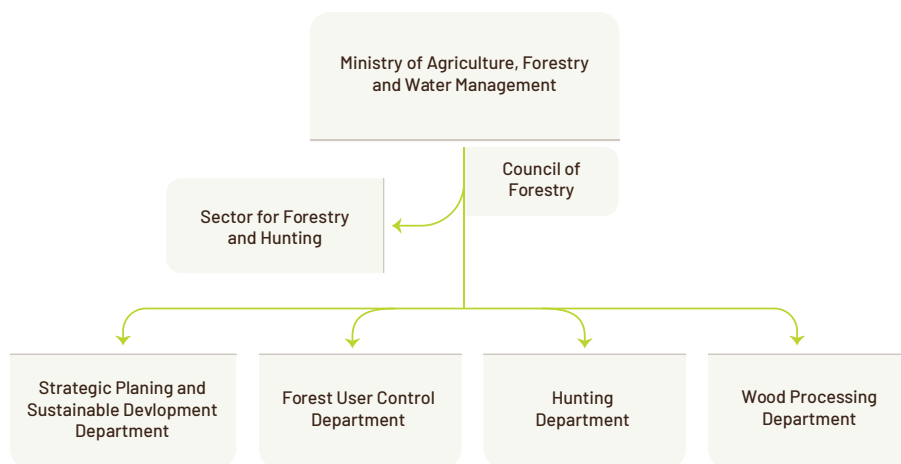
Currently, only the general part of the Forestry Program of FB&H has been adopted in 2017 (process started in 2010) by the FB&H Government. The general part of the Forestry Program of FB&H consists of principles, goals and guidelines for sustainable forest management based on data collected and processed in the form of studies. For the Forestry Program to be complete, it is necessary to adopt its implementation part with detailed strategic and operational goals that should be implemented in practice. As the process of adoption of the general part of the Forestry Program took so long at this time it will be quite complicated to revise and update it and based it on real data in the FB&H forestry sector. Forest policies are developed with little to no consideration of or input from private forest owners. Private forest owners are not organized in interest associations, while their property is extremely small-scale and fragmented into a few parcels. The Association of private forest owners “Naša Šuma” (established in 2006) and Association of private forest owners in Central Bosnia Canton (established in 2018) can be seen as an exception.

<sup>36</sup> <https://fmpvs.gov.ba/federalna-uprava-za-sumarstvo/>

## Republic of Srpska

Forest management is based on the Law on Forests as of 2008,<sup>37</sup> and its subsequent amendments in 2013 and 2020.<sup>38</sup>

The Government of the Republic of Srpska is responsible for the design and implementation of forest policy through the activities of the Ministry of Agriculture, Forestry and Water Management.<sup>39</sup> The Ministry established the Council for Forestry to make proposals on important issues in the field of forestry in the Republic, which consists of nine members. The Council for Forestry of the Republic of Srpska consists of representatives of the Ministry, other state bodies, institutions and organizations related to the field of forestry, local communities, non-governmental organizations, forest owners and others (Law on Forest, Article 11).<sup>40</sup> The Ministry manages the forestry sector of the Republic of Srpska through the public enterprise “Forest of the Republic of Srpska” organized as a joint stock company with the basic capital owned by the Republic of Srpska. The public enterprise “Forests of Republic of Srpska” conducts its business through twenty three forest management units, “Center for seed and nursery production” Doboј, “Research-development and project center” Banja Luka, “Center for karst management” Trebinje and Directorate of public enterprise Sokolac.<sup>41</sup>



**Figure 8** The organizational structure of the forestry sector in the Republic of Srpska<sup>42</sup>

37 Official Gazette of the RS, 75/08

38 Official Gazette of the RS, 60/13 and 70/20

39 <https://vladars.rs/sr-SP-Cyrl/Vlada/Ministarstva/mps/министарство/Documents/Strategija%20razvoja%20sumarstva.pdf>

40 <https://www.vladars.net/sr-SP-Cyrl/Vlada/Ministarstva/mps/Documents/Zakon%20o%20sumama%2017%2010%2009.pdf>

41 <https://vladars.rs/sr-SP-Cyrl/Vlada/Ministarstva/mps/Servisi/ors/Pages/sumarstvo.aspx>

42 <https://vladars.rs/sr-SP-Cyrl/Vlada/Ministarstva/mps/OM/Documents/broj%20056.pdf>



The first Forestry Development Strategy of the Republic of Srpska was adopted for the period 2011-2021. The document is encouraging the development of the forestry sector as a part of economic and rural development for the purpose of employment, protection of the natural environment and forest heritage, restoration of damaged forests, improvement of the ecological, economic and social functions of forests, encouragement of the ecological values of forests and other forest products, provision competitiveness of the wood industry, etc. The Forestry Program has not been developed although the Law on Forests of the Republic of Srpska from 2008 stipulated that the Forestry Development Strategy of the Republic of Srpska represents the basis for the development of the Forestry Program which together with the Action Plan and its implementation should enable the sustainable development and management of forests of all ownership types (Law on Forests Article 9 and 10).<sup>43</sup> Both Strategy and the Forestry Program should be adopted by the Parliament. Forestry Program, according to the law, covers the period of 20 years.

Forest Inspection is one of the thirteen republic inspectorates that operate withing the Inspectorate of the Republic of Srpska. It is in charge of inspections related to compliance with regulations in the field of forests and forestry, hunting, national parks, reproductive material of forest trees and shrubs, and in other administrative areas regulated by a special regulation.<sup>44</sup>

The new Forestry Development Strategy of the Republic of Srpska for the period 2022-2032 (which is in the final stage of development) is guided by the principles of the sustainable forest management. It implies the use of forests and forest land in such a way and to such a degree that biodiversity is preserved, and that the productivity, regeneration, vitality and potential of forests are at a level that would satisfy the environmental, economic and social needs of present and future generations, both at the local and national level, without endangering and damaging other ecosystems.<sup>45</sup>

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43 <https://www.vladars.net/sr-SP-Cyrl/Vlada/Ministarstva/mps/Documents/Zakon%20o%20sumama%2017%2010%2009.pdf>

44 <http://www.inspektorat.vladars.net/stranica/76/pregled>

45 <https://seerural.org/wp-content/uploads/2022/12/Sustainable-forest-management-in-the-western-balkan-region.pdf>

## Republic of Serbia

The main institution that regulates the forestry sector is the Ministry of Agriculture, Forestry and Water Management.

The Forest Directorate is an administrative body within the Ministry that performs state administration and professional tasks related to forestry policy, forest conservation, promotion and use of forests and wildlife, implementation of measures for the protection of forests and wildlife, control of seeds and planting material in forestry, inspections in the field of forestry and hunting, as well as other tasks determined by the Law.<sup>46</sup>

The Forest Directorate within this Ministry has the responsibilities for the approval of Forest management plans and control of the implementation of works on forest management, as well as of the control of trade in wood assortments. The Forest Directorate regulates activities related to wood processing, as well as involving economic development, and control of enterprises of the forest-based industry sector.

At the level of the Autonomous Province of Vojvodina tasks for the implementation of administrative jobs in the forestry sector are delegated to the Provincial Secretariat for Agriculture, Water Management and Forestry. Inspection tasks are done through the Department of Forestry and Hunting Inspection.<sup>47</sup>

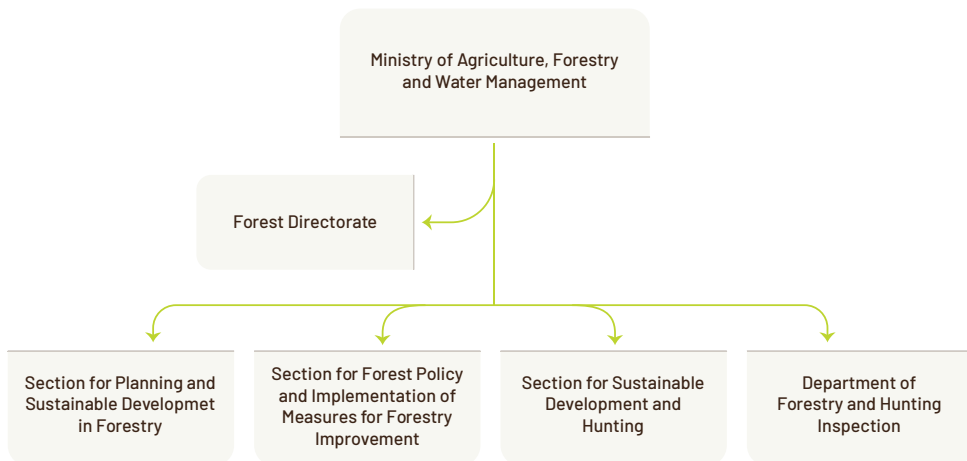


Figure 9 The organizational structure of the forestry sector in Serbia<sup>48</sup>

46 <https://upravazasume.gov.rs>

47 <https://psp.vojvodina.gov.rs/o-nama/sektor-za-sumarstvo/>

48 [https://informator.poverenik.rs/informator?org=Cvo33Q2wZGnDHytBQ&ch=B7e85r4rMtMRMyzb7&code="](https://informator.poverenik.rs/informator?org=Cvo33Q2wZGnDHytBQ&ch=B7e85r4rMtMRMyzb7&code=)

Law on Forests<sup>49</sup> defines the planning framework as displayed in the *Figure 10* Programme for Forestry Development defines strategic development goals of the sector with the implementation plan. It should contain five chapters: forest conditions, objectives and measures for their improvement, the plan of implementation of objectives and measures, with the determined dynamics and financial resources necessary to meet them. Programme for Forestry Development is supposed to be adopted by the Government of Serbia which is a change introduced by amendments to the Law in 2015.<sup>50</sup> Plan for the Development of a Forest Area defines strategic development goals of the sector with the implementation plan for the seven legally defined forest areas in the Republic of Serbia. Timeframe of this document is ten years. Forest Management Plan contains a baseline assessment of the forest status and concrete activities for implementation at the level of planning forest units owned by the Republic of Serbia, based on the higher-level plans. Timeframe of this document is ten years. Forest Management Programme is a planning document for multiple private forest owners from the territory of one or more local self-governments for the period of ten years. Annual Forest Management Plan lists planned activities for implementation in the forests within one year based on the higher-level planning documents. Annual Forest Management Plan for state owned forests contains implementation projects with more detailed elaboration of activities for smaller units.



**Figure 10** Legally defined planning forest planning framework in the Republic of Serbia

Despite being critical operational document to support forestry policy goals, Programme for Forestry Development has not been adopted. The only existing strategic document in Serbian forestry sector is the Forestry Development Strategy even though Law on Forests does not recognize this type of strategic document anymore. It was adopted by the Government of the Republic of Serbia in 2006, was not time framed and although some of the provisions are still relevant this document is largely outdated. For example, its main goals remains as relevant than ever. The first one is:

<sup>49</sup> <https://www.paragraf.rs/propisi/zakon-o-sumama-republike-srbije.html>

<sup>50</sup> Previously it was the competence of the Parliament.



...“ conservation and improvement of the state of forests and the development of forestry as an economic branch with the guiding principles of forest multifunctionality, under which is the irreplaceable role of forests in the mitigation of climate change, and in this sense the enhancement of forest capacities for that purpose” .... The second one is the commitment to provide financial and legal assistance for the afforestation of the land on which it is economically and ecologically rational to have forests. Beside afforestation, the improvement of forest resources by converting coppice forests to high productive forests was another important measure in the Strategy although it did not explicitly define quantitative targets in afforestation and conversion of coppice into high productive forests.<sup>51</sup> The implementation of these goals is still waiting to happen because not much is happening at the level of renewing and defining the strategic direction. It is encouraging that the results of the Second National Forest Inventory were published in December 2023, fifteen years after the first one.<sup>52</sup> The new data represent a perfect analytical ground for a long-awaited design of the Forestry Development Program.

It is of an utmost importance that forestry sector of Serbia with no delay adopts the document that address adequately the goals of the sector development. It is essential to develop a document at the national level, to integrate it and harmonize it with the other strategic sectoral documents, for example Integrated National Energy and Climate Plans.<sup>53</sup>

In addition to keeping still relevant policy goals, such as those related to the coppice forests from the previous Strategy, it is essential to consider the major developments at the EU level, mainly those related to the climate change challenges, when setting future goals and adequate measures for creating and securing sustainable forest management. They include EU Green deal, EU Biodiversity strategy 2030, EU Forestry Strategy 2030, new EU Strategy on Climate Adaptation, new European Climate Law, EU Directive on the Promotion of the Use of Energy from Renewable Sources. All these documents, combined, would supposedly guide the sustainable development of the Republic of Serbia in the direction of climate neutral and decarbonized economy.

Law on Forests stipulates that state forests in Serbia are managed by public enterprises established for forest management, namely “Srbijašume” and “Vojvodina šume”. In addition, the management of state forests is also performed by five public enterprises of National parks: “National Park Fruška Gora”, “National Park Tara”, “National Park Kopaonik”, “National Park Đerdap” and PE “National Park Šar planina”. Private forests are managed by their owners, while professional and technical work in the forests of physical persons is performed by public enterprises. Sometimes, private forests of other categories of owners (i.e. private companies, Serbian orthodox church) are managed by private companies.

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51 <https://upravazasume.gov.rs/wp-content/uploads/2015/12/Strategija-razvoja-sumarstva.pdf>

52 <https://upravazasume.gov.rs/oglasna-tabla/naredbu-o-proglasenju-prirodne-nepogode-i-merama-zastite-i-sanacije-suma-ostecenih-vetrolomima-i-vetroizvalama-2/>

53 <https://www.mre.gov.rs/tekst/sr/1115/-integrisani-nacionalni-energetski-i-klimatski-plan-republike-srbije-za-period-do-2030-sa-vizijom-do-2050-godine.php>



The Law on Forests provides conditions for sustainable forest management through clearly defined goals related to sustainable maintenance and improvement of forests, especially their productive capacity, biological diversity, regenerative capacity, vitality, and improvement of their climate change mitigation potential, as well as their economic, ecological, and social function, without harming the surrounding ecosystems. The Law on Forests treats all forest functions (production, ecological and social) in the same way and gives them the same importance and significance.<sup>54</sup>

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54 <https://seerural.org/wp-content/uploads/2022/12/Sustainable-forest-management-in-the-western-balkan-region.pdf>



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