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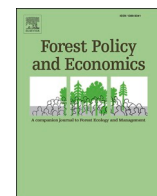
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# “Hands off our forests!” - The impact of the authoritarian rule on polish forest policy in the context of the European Green Deal

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## ABSTRACT

In recent years, numerous initiatives and instruments from the European Union have aimed to address climate change. As a result, forest policies of member states—formally outside the EU's direct competencies—have come under increasing pressure from the EU. Member states' responses have varied, largely influenced by their unique socio-economic and political contexts regarding forest policies. This paper examines the impact of an authoritarian shift in Poland, observed from 2015 to 2023, on the responsiveness of domestic forest policy and key policy actors to European policy stimuli. To this end, we collected and analysed data on forest policy development through desk research and 30 semi-structured interviews with representatives of key stakeholder groups. We interpreted the results using the Advocacy Coalition Framework. Our findings suggest that the authoritarian context in Poland initially strengthened eurosceptic attitudes among dominant actors in the forest policy subsystem, hindering the implementation of new measures aimed at addressing climate change and biodiversity decline. However, autocratic policymaking gradually weakened the coherence of the dominant forest coalition, compromised the social legitimacy of foresters, and positioned forest-related issues within a clear party-political framework. Consequently, the major external shock to the subsystem—the 2023 general elections and the subsequent change in government—opened a window of opportunity for significant forest policy changes aligned with the European Green Deal.

## 1. Introduction

The European Union (EU) has since 2019 adopted numerous pieces of legislation and strategic documents addressing climate change under the European Green Deal (EGD). This comprehensive political project aimed at reaching climate neutrality by 2050 has focused on the policy areas that lie within the shared competences of the EU, such as the environment, agriculture, energy, and transport. At the same time, some of its legal and political instruments address other policy areas, such as forest policy. While according to the European treaties forest policy is not formally within the EU competences, over the last few decades it had been gradually indirectly institutionalised at the EU level through the activities of the European Commission (EC) and the European Parliament (EP) through other established EU sectoral policies, despite the reluctant attitudes among the Member States (Aggestam and Pülzl, 2020; Pülzl et al., 2018; Winkel and Sotirov, 2016; Wolfslehner et al., 2020). EGD brings another layer of European rules, policy goals and

financial measures in forestry-related domains of climate, sustainability and biodiversity conservation, spilling over to forest policy itself and potentially enhancing EU's influence over forest management across the continent (Aggestam and Giurca, 2021). Concurrently, it activates existing entrenched coalitions present in the field of EU forest policy: the environmental one, including environmental NGOs collaborating with like-minded EU institutions (e.g. DG ENV) and national environmental authorities from forest-poor countries (Belgium, Denmark, Netherlands) and Southern EU member states (e.g. Greece, Italy); and the forest use coalition, with forest owners, forest industries and state forest authorities in forest-rich countries (e.g. Sweden, Finland, Austria, Germany, Eastern European countries) collaborating with like-minded EU institutions (e.g. DG-Agri) (Sotirov et al., 2021). Two main points of argument among the coalitions have been the concerns about sovereignty vs. increased EU's mandate in forest policy as well as the relative importance of economic (commodity) and ecological (amenity) goals (Gordeeva et al., 2022). As the EGD and its EU Forest Strategy 2030

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(EUFS) are seen as a shift towards more EU oriented governance emphasising amenity over bioeconomy, it can be expected that some MS may be reluctant to implement new rules and instruments and to seek reducing their impact on national forest policy as much as possible (Sotirov et al., 2021; Winkel et al., 2015). The process of adopting EU rules may be further hindered by domestic politics - particularly due to the observed rise of eurosceptic, populist, and autocratic rhetoric across the EU (Kelemen, 2024). So far, however, national studies analysing this process are lacking.

Poland is an interesting case to analyse in this respect – with a strong forestry sector and an influential forest service it has traditionally been viewed as a firm supporter of the domestic control over forest policy. These tendencies were strengthened during two terms of the eurosceptic government of the “United Right” coalition, which displayed some autocratic features. However, with the new government elected in October 2023, the official discourse concerning forests has changed and the openness of the Polish authorities to the EU's policy goals appears to have considerably increased. Therefore, the research question posed in this paper is as follows: “How did the structure of the domestic forest policy subsystem in Poland and the autocratic nature of the Polish government influence the reception of forest policy within the EGD?”. To answer this question, we identified following research objectives: (1) to identify key characteristics of the forest policy field in Poland by employing a coalitional perspective of Advocacy Coalition Framework (ACF - Sabatier and Jenkins-Smith, 1999); (2) to reconstruct the perspective of the dominant actors in the Polish forestry subsystem on climate change and its impact on forests; (3) to investigate the reception of European forest policy, as presented in EGD, by different coalitions within the Polish forest policy subsystem; (4) to trace the impact of the authoritarian rule in Poland on the stability of the dominant policy path; (5) to analyse the reasons for a potential change of forest policy following general elections. The paper contributes to the scholarship analysing the European forest politics as well as to the relatively underdeveloped body of research covering the impact of authoritarianism on forest policy. By employing the ACF, the paper also offers a novel vantage point that facilitates understanding of how the autocratic rule may influence the dynamics of the Europeanisation of domestic forest policy.

In the following section we present the literature on the impact of the autocratic rule on environmental and forest policy and the way that ACF can enhance analyses of this process. Next, we describe material and methods. This is followed by the presentation of research results. The final section of the paper includes discussion and conclusions.

## 2. Conceptual approach: authoritarian rule, forest policy and ACF

Authoritarian rule has been on the rise in the twenty-first century accounting for the “third wave of autocratization” (Lührmann and Lindberg, 2019). This process has been affecting democracies across the globe (e.g. Brazil, Hungary, India, Israel, Turkey, the USA) in the form of gradual erosion of democratic principles under a legal façade. It involves concentration of power in the executive, weakening of checks and balances and political accountability, institutional changes to reduce the power of opposition, limiting media freedom and civil society, intensified repression of political opponents (Bermeo, 2016; Coppedge, 2017). The new authoritarian governments are led by ‘strong man’ leaders, including Bolsonaro, Putin, Orban, and Trump, whose shared characteristics include: “the creation of a cult of personality; contempt for the rule of law; the claim to represent the real people against the elites (otherwise known as populism); and a politics driven by fear and nationalism” (Rachman, 2022, p. 10). The authoritarian right-wing, populist and xenophobic regimes can also be characterised by cronyism, corruption and neoliberal state policy leading to the expansion of wealth of political elites (Berberoglu, 2020) sustained by “autocratic innovations” (Morgenbesser, 2020), such as disinformation,

intrusive surveillance, and the use of troll armies to harass critics and erode public trust in independent media outlets.

There are numerous connections between authoritarianism and environmental politics and governance as authoritarian parties are often fuelled by tensions between urban and rural populations, autocratic leaders dress themselves as protectors of some aspects of the environment linked to the national identity, while engage in “resource populism” to exploit environmental resources for political support and economic gains (Brain and Pál, 2018; Lyall and Valdivia, 2019; McCarthy, 2019). Therefore, authoritarian regimes are likely to compromise state environmental protection in numerous ways (Tosun and Schaub, 2024). This can proceed through discontinuing of environmental laws and policies or adopting regulations undermining them. Another avenue might involve shifting resources from environmental issues to projects stimulating economic growth, such as large infrastructure investments that additionally affect the environment. Also, the effectiveness of environmental administration may be reduced due to cuts in staff and funding or by introducing advocates of competing interests and incompetent political nominees into advisory and executive positions in environmental bureaucracies. Environmental knowledge creation and distribution might be compromised by financial setbacks and discrediting of scientific evidence and environmental scientists. Dwindling democratic freedoms and sources of public financial and organisational support for NGOs as well as political repressions and discrediting of activists and politicization of judiciary negatively influence the ability of civil society actors to advocate environmental policies and control government's actions potentially negative for environmental protection through litigation. Finally, authoritarian states are less likely to engage in international environmental agreements that facilitate implementation of challenging global environmental protection measures (Tosun and Schaub, 2024). These negative impacts of autocratic governments on environmental protections have been identified in countries with autocratic governments across the globe, e.g. Brazil (Menezes and Barbosa Jr, 2021; Rached et al., 2023), the USA (Bomberg, 2021; Fiorino, 2022), Turkey (Acara, 2019), Uganda (Kantel, 2019), Vietnam (Carlitz and Povitkina, 2021) or Hungary (Antal, 2021).

Forest management is one of the areas of environmental policy influenced by authoritarian rules. In India and Indonesia, the authorities removed environmental legal restrictions which contributed to creating forest plantation in the areas of formerly protected forests, industrial logging, mining and land development (e.g., Dutta and Nielsen, 2021; Tomsa and Bax, 2023). In Brazil, deforestation rates strongly increased during Bolsonaro's presidency (Silva Junior et al., 2021). Donald Trump during his presidency was pushing for logging of protected old-growth forests opening them to timber industry, energy, and mining projects, e.g. in Alaska's Tongass National Forest (Eilperin and Dawsey, 2019). Extractivist forest policies pursued by authoritarian governments, often contribute to harassment of local forest defenders, as in the Philippines (Dressler, 2021). Top-down interventions in forest policy, also oriented at forest protection, contribute to processual and distributional injustices and aggravate inequalities, particularly affecting local and indigenous communities, e.g. in China, Vietnam or Laos (Bruun, 2020; Lo, 2021; Ramcilovic-Suominen et al., 2021). In Turkey, authoritarian government's emphasis on economic growth over environmental concern and side-lining of public participation led to the intensified pressure on forests for wood harvesting, fragmentation and losses of forest ecosystems, for instance because of the transformation of protected areas into recreational ones (Atmiş and Günşen, 2018).

Poland has been one of the EU countries associated with the “authoritarian wave”. Its illiberal and nationalist Law and Justice Party (Prawo i Sprawiedliwość – PIS) formed the ruling “United Right” coalition and controlled country's legislature and executive since parliamentary and presidential elections in 2015. This has changed only recently following the general elections in October 2023, when, despite gaining the most votes, PIS was not able to form a government and was replaced by a coalitional government of opposition parties. PIS's rule in

Poland was characterised by anti-systemic, anti-elitist and conspiratorial rhetoric oriented against Western-imported liberalism, defiance of the rule of law, subordinating the courts, the civil service, and the media to the executive, as well as restricting civil liberties of minorities in the interests of the national majority (Markowski and Zagórski, 2023; Pirro and Stanley, 2022; Sadurski, 2019). Consequently, at some point Poland was assessed as the fastest country globally to descend into authoritarianism (Alizada et al., 2021). The authoritarian rule in Poland had consequences for environmental policies - PIS government compromised nature conservation restrictions (e.g. in the Białowieża Forest), promoted large infrastructural projects (e.g. a channel through the Vistula Spit), restricted implementation of renewable energy sources, obstructed climate neutrality efforts, and curtailed participation of civil society actors in environmental governance (Markowska, 2021; Żuk and Żuk, 2021). Consequently, environmental issues have been politicised and latent ecological conflicts revived (Żuk, 2023). So far however, the impact of autocratic rules on forest policy in Poland has not been analysed.

The Advocacy Coalition Framework (ACF) provides a valuable vantage point for analysing the impact of autocratic rule on forest policies, which, to the best of our knowledge, has not yet been employed in the literature for that purpose. Developed by Paul Sabatier and Hank Jenkins-Smith (Sabatier and Jenkins-Smith, 1999), the ACF is rooted in the idea that policy processes involve multiple actors with divergent beliefs, interests, and values interested in a policy area, whose interactions constitute “policy subsystems”. The framework provides a comprehensive and systematic approach to analyse how different policy actors, organised into coalitions, engage in the policy process leading to its change or stability. It has been widely used to understand environmental and forest policy dynamics (Hysing and Olsson, 2008; Niedziałkowski and Chmielewski, 2023; Sotirov and Memmler, 2012).

One of the basic assumptions of the ACF is that some actors share common beliefs, which subsequently form the basis for cooperation among them within a coalition. Policy beliefs are seen as stable, deeply held convictions that guide the behaviour of policy actors and shape their preferences (Sabatier, 1988). Belief systems can be structured into “deep core” beliefs (fundamental normative and ontological positions), “policy core” beliefs (fundamental policy positions and basic strategies to achieve normative axioms), and “secondary aspects” (preferences for instrumental decisions to implement policy core). While “deep core” beliefs are unlikely to change over time, “policy core” may be altered following serious anomalies, and “secondary aspects” display the greatest flexibility.

The ACF identifies several factors facilitating policy change: 1) external events outside the control of actors can provide opportunities for policy change and influence mobilization; 2) internal events related to problems or scandals can raise doubts about beliefs; 3) policy-oriented learning; 4) negotiated agreements between adversarial coalitions. One of the distinctive feature of ACF is the recognition of the role of policy-oriented learning defined as “enduring alternations of thought or behavioral intentions which result from experience and which are concerned with the attainment (or revision) of policy objectives” (Sabatier, 1988, p. 133). ACF assumes that policy actors engage in a continuous process of learning from their experiences, interactions with others, and feedback from the policy environment. Learning is thus considered crucial for coalition adaptation and can also lead to policy change. However, usually such change is restricted to less important secondary aspects of a given policy.

The ACF offers analytical tools to understand the ways in which new political developments can influence forest policies - the introduction of the EGD and the increasingly autocratic characteristics of the political environment on the Polish forest policy subsystem can be seen as external events to the domestic forest policy subsystem. Both factors can also influence internal dynamics within the subsystem by affecting the relative positions of dominant and challenger actors (e.g., through the politicization of civil service and the goals of forest management, or by

providing certain actors with new legal opportunities at the EU level). By focusing on actors' coalitions, their beliefs, and their strategic behaviour in response to external events, the ACF facilitates an understanding of how the interplay between European policies and autocratic rule stimulates policy dynamics. Furthermore, it offers a common approach for prospective comparative studies. While, the ACF has been already employed to understand the impact of Europeanisation on forest policies (e.g. Sotirov et al., 2021), its potential has not yet been utilised to analyse the impact of autocratic rule. This paper aims to fill this gap and serve as a reference for further studies addressing this issue.

### 3. Material and methods

We applied a qualitative case study research to analyse the structure of the forest policy subsystem in Poland and its responses to climate and biodiversity policies of the EU. To identify the characteristics of the Polish forest policy subsystem, reconstruct the timeline of events and the positions of the key groups of actors we carried out desk research involving various sources of written outputs (reports, conference presentations, scientific papers, official positions, web-sites, newspaper articles, etc.). Collected corpus included 107 items. Additionally, to get a more personal perspective on the changes of forest policy and on the beliefs values involved, we carried out 30 semi-structured interviews with representative of various groups interested in forest management. These included: NGOs (9), scientists (7), foresters (5), wood industry representatives (3), public officials (2), policy advisors (2), private forest owners (2). When choosing groups and determining the number of interviews within each group we made sure that the selection of interviewees provided for variety of positions both between groups and within them – particularly within the group of scientists we interviewed both scientists with forestry and environmental background, and within the group of NGOs we talked to organisations with a more ecological and a more grass-root profile (see Niedziałkowski and Chmielewski, 2023). After an e-mail invitation, the interviews were carried out on-line between January and October 2023 by the co-authors of the paper (for a list see Annex 1). The interviews followed an interview guide (see Annex 2) consisting of twelve questions divided into three categories: (1) general questions regarding Polish forest policy system; (2) questions referring to the impact of climate change on forest policy; (3) questions referring to the EU Forest Strategy 2030 and its reception in Poland. The design of the interview guide was directly linked to the first three research objectives of this paper and informed the structure of the Results section. The interviews took between 22 and 100 min. All interviews were recorded, transcribed and anonymized. The interviewees could read the transcript and make changes if they wished so.

Both data from desk research and semi-structured interviews were analysed with the use of qualitative data analysis (QDA) software to reconstruct the timeline of events, groups of stakeholders involved and their positions and beliefs. For that purpose we carried out inductive coding following a general inductive approach (Thomas, 2006). The inductive categories emerged directly from the analysis of transcriptions and written outputs and were then linked to the three main deductive categories represented by the design of the interview guide (connected with the first three research objectives) as well as to the fourth, inductively emerging category connected with the impact of the authoritarian rule on Polish forest policy (the fourth research objective).

To reconstruct forest policy responses to climate change in 1990–2023 we carried out an analysis of formal documents regulating forest management in Poland (e.g. Forest Act, Forest Protection Instruction, Forest Management Instruction, Principles of Silviculture) from years 1986–2023 (24 items in total; see Annex 3). This process involved coding of the documents using QDA software to identify key changes of formal rules and changes in policy core preferences, deep core beliefs and secondary aspects, as proposed by ACF. The material was analysed in two steps: (1) we coded each document following a coding scheme derived from questions: What were the primary goal(s)



for forest policy?; Which actors were identified and how power was distributed?; How were the key problems described in terms of seriousness and causes?; How should the problems be managed and through which policy instruments?; Which management rules have been employed over the years in terms of cutting management, cutting age, regeneration, fire protection and species and habitat protection and how were they changing?; (2) we inserted citations from the coded documents in Excel files, and interpreted the data, gradually aggregating it into summary tables and text descriptions. Additionally, we analysed the use of the word “climate” in all 24 documents regulating forest management to see if and how it has been changing over time.

## 4. Results

### 4.1. The characteristics of forest policy subsystem in Poland

Polish forest subsystem is quite characteristic when compared to the other EU countries. Although the forest cover of almost 30 % (9.26 million ha) is close to the European average, most of the forests (almost 80 %) are state owned and managed (96 % of them) by the State Forests Holding (SFH – *Państwowe Gospodarstwo Leśne “Lasy Państwowe”*) (Statistics Poland, 2023b). This property structure, characteristic for socialist states between 1945 and 1989 and connected with the nationalization of forests after the World War II, was discontinued in most of the formerly socialist countries belonging to the EU through reprivatisation, but retained in Poland. As a result, the main organisation in the field – SFH, has a monopolistic position in domestic wood production accounting for 90 % of the annual national timber harvest in 2022 and the revenue exceeding 3,5 billion euros (89 % of which comes from the sale of timber). Polish forestry and wood sector is an important contributor to the Polish economy with almost 460 thousand employees and more than 10 % share in Polish gross output (Statistics Poland, 2023b). Of particular importance is the Polish furniture industry - the 3rd largest exporter on the global furniture market (PKO BP, 2023).

SFH employs more than 25,7 thousand people with an average salary of 150 % of the national average (SFH, 2023). It is a hierarchically organised “state within a state” bureaucracy characterised by top-down decision-making, strong professional culture and high social prestige (Lawrence, 2009). While legally obliged to conduct integrated, sustainable, multi-functional forest management, it enjoys significant freedom in interpreting these goals and in choosing specific management targets and methods (Konczal, 2020). Therefore, its management priorities do not always conform with those of the government and with the expectations of other social groups interested in forest management (Chudy et al., 2016; Czajkowski et al., 2014; Konczal, 2017; Niedziałkowski and Chmielewski, 2023). Consequently, Polish forest policy is characterised by a high level of conflict (Nousiainen and Mola-Yudego, 2022).

The characteristics of the Polish forest policy subsystem (relatively forest-rich country with considerable national forest industries) contribute to the positioning of the Polish forestry actors in the discussions concerning forest policy at the EU level. As suggested by Sotirov et al. (2021), Poland, together with other Eastern European countries of similar features, Sweden, Finland, and often also Austria, France, and Germany belonged to the EU-level advocacy coalition opposing common EU forest policy, supporting active forestry, and flexible forest-economy friendly policies within the competencies of Member States. This coalition included forest owner organisations and forest industries, state forestry authorities, as well as EU institutions responsible for agriculture. An adversarial environmental coalition included environmental NGOs, EU institutions responsible for the environment, as well as national environmental authorities in forest-poor countries with weak forest industries and strong NGOs (Benelux countries, Denmark) and southern EU countries (Greece, Italy, Spain). This coalition supported stronger EU regulation of forest policy and, particularly, of the commercial use of forests to pursue environmental goals such as biodiversity

protection and global sustainability.

At the national level, Polish forest policy subsystem was dominated by the forestry coalition including foresters from SFH, public officials from the Ministry of the Environment (supervising SFH), local authorities from areas where forestry was an important part of the local economy, as well as scientists specialising in forestry issues (Blicharska and Van Herzele, 2015; Konczal, 2017; Konczal, 2020; Niedziałkowski, 2016; Niedziałkowski and Chmielewski, 2023; Rancew-Sikora, 2002). This coalition represented beliefs oriented at the utilitarian values of forest management, highlighting the need to actively manage forests to ensure their multifunctionality and sustainability. The adversarial environmental coalition comprised of environmental NGOs, environmental scientists (mainly biologists) and, occasionally, representatives of DG ENV. This coalition represented beliefs focused on nature conservation and protection of natural processes seen as crucial for the protection of sustainability of forest ecosystems and their biodiversity. This protection would mainly be viewed as requiring designating forests as national parks and nature reserves with hands-off management. The environmental coalition has recently been strengthened by the bottom-up forest protection movement, which joined the debate on forests requesting strengthened participation in forest governance and new demands on forests focused on the well-being of local communities. Still, the dominance of the forestry coalition in the subsystem has been very strong, as illustrated by the fact that only 0,79 % of Polish forests is strictly protected (Statistics Poland, 2023a) in comparison with the European average of 1,8 % (FOREST EUROPE, 2020). Also, no national park (a designation with its own administration, independent from SFH) has been established since 2001, despite numerous initiatives in this regard.

### 4.2. Responses to climate change in Polish forest policy

The analysis of the documents regulating forest management in Poland showed that the word “climate” was predominantly and consistently used for the description of local microclimatic conditions shaped by forests and also influencing forests (temperatures, precipitation, vegetation season, etc). “Climate change” first appeared in the mid-2000s in official management guidelines (Silvicultural Principles) enumerated as one of the factors that influence forest ecosystems. However, it was not translated into concrete management practices. In the documents in force since the early 2010s, the impact of climate change on the structure and composition of forest communities has again been acknowledged together with its role in more frequent weather anomalies and increased fire hazards. This time, one general management suggestion was added concerning promoting tree species that can adapt to changing environmental and climate conditions. Still, potential risks connected with climate change were to be addressed using the standard management rules and tools available to forest managers and forest owners, rather than by developing new ones.

This conservative approach to climate change is confirmed by the results of the analysis of formal forest management rules. The transition from the production-oriented paradigm of forest management prevalent until the end of the 1980s to a more integrated model, introduced formally by the Forest Act of 1991, was the only major policy change in the last 35 years. It resulted in the gradual adoption of more habitat and biodiversity friendly management practices (e.g. limiting clear-cuts, promoting natural regeneration, allowing for dead wood in the forest). Following this, the general provisions of the Forest Act regarding goals, values, principles and key stakeholders have remained the same and centred on preserving the conditions for sustainable long-term multifunctionality of forests by balancing three basic functions of forests (ecological, productive, and social). Hence, climate change did not elicit a policy response similar to biodiversity conservation.

These results of the analysis of formal documents can be interpreted with the use of data from desk research and semi-structured interviews which suggest that climate change was not treated by the dominant

actors in the subsystem as a particularly large threat to forest management. Polish forest policy was hardly influenced by extreme weather events affecting forest management in various parts of Poland (e.g. flooding of 2010; windstorm of 2017; Bark beetle spread of 2015–2018; draught of 2014–2015 and 2019–2020) that could be associated with climate change and could potentially trigger policy adjustment. A few scientific studies pointing to the effects of climate change on Polish forests and suggesting changes in management practices (e.g. Borecki et al., 2017; Szmyt, 2020; Szwańgrzyk, 2013) also had little effect on formal forest management rules. This could be associated with the general perception among the foresters of SFH that, firstly, although climate change is happening its results with regard to forests would appear gradually, and, secondly, that potential challenges could be handled within the existing regulatory framework and with the use of already existing toolbox of forest management practices. Hence, foresters did not see the need for policy adjustments, not to mention major policy changes. This approach was well articulated by the SFH Director General in 2019, who stated that *“modern forest management, if carried out sustainably, as in Poland, is in itself a good response to climate change”* (Prynda, 2019).

#### 4.3. The reception of EGD by the Polish forest policy subsystem

Against this background, one could expect that EGD and its components addressing forest management in the context of climate change would be approached with scepticism. Indeed, as suggested by the results of desk research, the publication of EGD in 2019, followed by the EU Biodiversity Strategy (EUBS, 2020), and the New EU Forest Strategy (EUFUS, 2021) were not received favourably by the dominant actors in the Polish forest policy subsystem. SFH commissioned scientists specialising in forestry and their own in-house experts with evaluations of the prospects of expanding the strict forest protection to attain the goal of EUBS (10 % of the country's territory strictly protected). Resulting analyses pointed to the significant problems connected with the prospective implementation of the EUBS's goal, including lower revenues from the sale of timber by 2.5 billion PLN (0,7 billion euro), reduction of employment in the wood sector by 200,000 people, and limiting or discontinuation of production of 90 % of companies from the forest and wood sector located in rural areas. As suggested by one of the experts: *“The real challenge is not to further increase the area of ‘protected areas’ (...), but to improve and implement as widely as possible methods of forest management that are conducive to preserving its truly multifunctional character (...), as well as to ensure the economic efficiency of forest management and to prepare forest ecosystems for the problems that are already emerging (...) from the changing climate and other environmental factors. Meeting this challenge, however, requires active, well-thought-out actions and programs, rather than pushing ‘do-nothing’ strategies, as is the case with strict protection”* (Brzeziński, 2021, p. 151).

These analyses created a backbone of further activities of the forestry coalition aimed at protecting Polish forest policy against the challenges of the European rules and strategies. As a result, a coherent set of beliefs and arguments was developed that could be reconstructed based on the desk research and semi-structured interviews. Representatives of the forestry coalition perceived EU forest policy initiatives as threatening sustainability of forests and wood production, and negatively affecting economic stability of SFH, its employees, and the whole forest and wood sector. They saw strict protection as a potential natural, economic, and social disaster and demanded more active management to address climate change adaptation and mitigation, not less. In their view, new policy goals had poor substantive bases and were too vague, with many definitions lacking, which made them unfeasible. Furthermore, as suggested by the members of the forestry coalition, new rules and goals had been developed based on the information from other countries and only to a very limited degree applied to Poland. Members of the forestry coalition questioned legal authority of European institutions with regard to forest policy and criticized the fact that the governments and

intergovernmental processes (e.g. Forest Europe) had been disregarded. Consequently, they argued that the new arrangement was more centralised, imposed “there is no alternative” mentality, and was reminiscent of the communist era. The dominant actors in the field also felt ignored during the policy-making process and saw their position challenged by favouring “non-expert” social groups. Foresters and their allies thought that it was not the forest and wood sector that should bear the costs of addressing climate change but energy sectors, which were the main contributors to the climate crisis. Finally, they suggested the need to educate the society, so that the general public understood the challenges of the implementation of new policy goals and supported “rational” approaches.

These arguments and beliefs were in stark contrast to the beliefs of the adversarial environmental coalition of environmental NGOs and environmental scientists. This coalition believed that policy responses to climate change and biodiversity loss should be strongly informed by self-regulating natural processes and involved large areas of set-asides. They also strongly contested the core belief of foresters in “sustainable and multifunctional” forest management that precluded strict protection – as argued by the NGO activist 5: *“in the age of climate change forest policy should verify the doctrine of sustainable, multifunctional forest management (...) In our view, it [the doctrine] does not work. (...) If you say, as in our forest management, that on each and every hectare of forest one has to balance three functions of the forest – social, natural, and economic – this is the key to our problem. This is simply impossible”*. The interested NGOs formed a “10 % coalition” to support the implementation of the goals of the EUBS in Poland (<https://koalicyja10.pl/>), e.g. by creating a “shadow list” of areas that should be protected. However, they had limited possibilities to influence public officials and the direction of forest policy, as illustrated by the fact that the major conference organised by the “10 % coalition” in January 2023 was attended neither by representatives of the Ministry of Climate and Environment nor SFH. The coalition mainly focused on informing about the new EU guidelines and rules, their interpretation and on proposing sites that could potentially be included in the 10 % pool. At the same time, the members of the coalitions expected that the EU institutions will pressure Polish authorities using obligatory formal instruments: *“people are interested which direct legal instruments will be used [by the EU] to enforce certain behaviour. We are used to a model where we appeal to the European Union to force something on our authorities”* (NGO activist 1). However, they also recognized that in case of the EUFS, that was not legally binding, these possibilities were very limited.

Meanwhile, SFH was actively mobilizing their allies in the coalition. Some forestry scientists together with the representatives of SFH took part in meetings in Brussels to negotiate the shape of the rules to be implemented. SFH encouraged local authorities, wood industry representatives and private forest owners to participate in the consultation processes of the projects of the EU documents. Because of this Poland was the fourth country in the EU in terms of the number of submitted feedback instances during the consultation of the EUBS (EC, 2021). Foresters were also supported by top politicians from the governing parties and by public officials from various ministries (particularly the Ministry of Climate and Environment and the Ministry of Foreign Affairs). The latter coordinated their actions with the representatives of SFH to respond to the expectations and challenges coming in from the EU, while perceiving them as a threat and a difficulty that needs to be tackled.

Under pressure from the upcoming regulations and strategic goals foresters from SFH were ready to implement some changes in forestry management addressing secondary aspects of forest policy but that did not challenge their core beliefs and the organisational and economic stability of the existing arrangements. For instance, a project of a “Comprehensive program to counteract forest dieback processes in Poland until 2030” was prepared by representatives of SFH and forestry scientists to address negative effects of climate change. It included a number of actions to mitigate and adapt to climate change (e.g.

increasing the diversity of tree stands in terms of species, age and structure, improving monitoring of insect outbreaks and fire control). However, it did not include suggestions of the environmental coalition, such as strict protection measures, new models of forest restoration not based on artificial selection and planting of nursery-bred seedlings, or promoting tree species that contribute to habitat diversity and sustainability but do not produce valuable wood. Because of that, these proposed changes were criticized by experts representing an alternative paradigm of forest management as too conservative and ineffective. Still, considering the existing balance of power between the coalitions in the forest policy subsystem in Poland, the environmental coalition had little impact on policy-making, and the clear goal of the dominant forestry coalition was to give in as little as possible to the new EU initiatives and only to those that were obligatory (e.g. LULUCF Regulation), while largely ignoring those without “teeth” (e.g. EUFS, EUBS).

#### 4.4. The consolidating impact of the authoritarian rule on existing forest policy

This hard-line approach to climate and biodiversity policies of the EU influencing forest management is understandable when considering the characteristics of the Polish forest policy subsystem with the important economic role of the forest and wood processing sectors and the strong position of a public forest agency. However, as suggested by the desk research and the interviews with the representatives of the coalitions, this approach was additionally strengthened by the autocratic character of the coalitional government of the “United Right”. Its features became apparent during the conflict over the logging in the Białowieża Forest, an old-growth forest and a biodiversity hot-spot affected by a bark beetle outbreak. In 2016, despite the on-site direct protests of environmental activists and the criticism of environmental scientists, the Minister of Environment Jan Szyszko decided to start a large scale operation of removal of infected trees with the use of harvesters quoting the biblical rule to “have dominion” over nature to justify the intervention (Markowska, 2021). Szyszko, a forestry professor who also self-identified as a forester, had to revoke his decision after the ruling of the Court of Justice of the European Union (CJEU) in November 2017 (C-441/17) that required Poland to cease management operations that breached Poland's obligations under the Habitats and Birds Directives. The ruling was strengthened by a potential penalty payment of at least 100,000 euro per day if its recommendations were not met. The Minister's disregard for legal rules, civil society protests, and environmental scientists' arguments—combined with anti-environmental religious rhetoric and violent actions against forests and peaceful protesters—revealed an autocratic approach to decision-making (Blavascunas and Konczal, 2018; Żuk and Żuk, 2021). Photos of activists protesting on harvesters, their forceful removal by heavily equipped forest guards, and the later acknowledgment of logging as illegal undermined the social legitimacy of foresters in Poland. As admitted by an interviewed forester: “A series of events, I suppose, influenced the perception of SFH to be negative. The first such negative action (...) was the famous Białowieża Forest (...). I would prefer to take other measures to combat the bark beetle there, as it had been done for years, with a chainsaw and not with a harvester (...). This was not the way to go” (Forester 4).

The autocratic features of the forest policy in Poland further increased in 2020 when a representative of “Solidarna Polska” (SolPol) party, a euro-sceptic coalitional partner of PIS, became a Minister of Environment. The new minister held this position until the reconstruction of the government of the “United Right” in October 2020, when SolPol was offered a position of vice-Minister of Environment responsible for forest policy. This meant the party could use resources of SFH and the subject of forest management as a springboard for its political agenda (Serafin and Czernich, 2021). It became apparent in March 2023, when the Director General of SFH, a SolPol nominee and a politically active member of this party, officially endorsed the “United Right” ahead of the general elections to be held in October 2023. The

electoral campaign of SolPol was based on the opposition to the perceived attempts at Europeanization of forest management in Poland. Politicians of SolPol strongly disapproved the initiatives to make forest policy an area of shared competences of the EU and denounced the “aggressive climate policy” and “EU prohibitions” concerning forest management as proposed in the EGD. They also criticized the judgment of the CJEU of 2 March 2023 (C 432/21), based on the case brought by the European Commission after the appeals of environmental NGOs. The CJEU ruled that decisions of the Minister of Environment to accept forest management plans should be subject to the judicial control. It also assessed as inadmissible legal provisions exempting forest management following “good forest practice” from the rules imposed by national and European legislation aimed at biodiversity conservation.

SolPol responded with a social campaign entitled: “In the defence of Polish forests” and started collecting signatures for a legislative project to amend the Forest Act so that it explicitly recognizes that: “*The Republic of Poland shall retain exclusive competence to formulate and implement policy relating to the protection and management of forests owned by the State Treasury*”. SFH was engaged in the process of collecting the signatures – e.g. Regional Directorates of SFH required the heads of forest districts to collect signatures in their areas (in some cases with an expected return). As a result, within a few days 500,000 signatures were collected. The campaign was accompanied by heavy and misleading anti-EU rhetoric. The leader of SolPol Zbigniew Ziobro was suggesting that “*Brussels is not about ecology, it's about business - they want to eliminate Polish competition. We are a threat to German and French producers, because they have sold their forests*” and that “*EU's inclinations go a long way. This is a coalition of pseudo-environmentalists and interests of western companies*” (Kojzar, 2023). He also falsely claimed that: “*The plans of EU officials aim to prevent Poles from entering one in three - roughly speaking - Polish forest*”. These arguments were transmitted in a non-critical way through government-controlled media. Following the campaign, in April 2023 the lower chamber of the Polish Parliament adopted a resolution “in the defence of Polish forests” in which it “*strongly opposes any action by both the European Commission and the European Parliament aimed at taking away Poland's exclusive right to decide on forests*”.

#### 4.5. The destabilising impact of the authoritarian rule on the forest policy subsystem

This approach to the common EU goals did not augur well for their implementation in Poland and for the change of existing forest policy that did not consider climate change as a serious issue requiring urgent management measures. One could argue that the existing policy path of conservative forest policy supported by the dominant forestry coalition would be strengthened. However, paradoxically, the activities of SolPol and the government of the “United Right” have undermined some of the pillars of the existing regime. First of all, as reported by media, SFH and forest management became increasingly politicised and used as a financial vehicle for the controlling party. This involved promoting members of SolPol to high-rank positions within SFH, using financial resources of SFH to promote SolPol politicians in conservative media and to strengthen the party organisationally and financially. In April 2021 a member of SolPol was appointed as the Director General of SFH, which strengthened the political influence over SFH. As suggested by one of the interviewed foresters: “*Current Director General and his team (...) treat their jobs as a means to realize certain party goals and politics. There is no concern, debate about changing climate and laws, about the need to do something, to adjust. This is a secondary issue. Unfortunately, this is the reality*” (Forester 2). He also observed: “*These are not expertise, intellectual value, professionalism that are a prerequisite for promotion [in SFH] but a party affiliation*”. This politicization of SFH proved quite disturbing for some foresters within SFH – it signified a shift from an arrangement where political changes affected top ranks but left lower levels of the organisation relatively isolated from politics and their occupancy informed by merit. In the new context, political nominees promoted



foresters at various levels of organisation based on political preferences and irrespective of their professional standing: *“Politics is entering SFH brutally at lower and lower levels (...). Now this [political] uncertainty is going down to such levels that it is also blocking daily work”* (Forester 1). Consequently, some foresters were informally distancing themselves from ministerial policies and their own top ranks, who openly expressed political support for their party.

The second factor undermining the dominant policy path was connected with the resource approach to forest management, characteristic for autocratic regimes. In the 1990s, Polish forestry went through a period of “ecologization” during which ecological and social goals were legally put on par with productive functions of forest management. Although this approach has never been officially challenged, the increased level of harvesting and disregard for ecological demands raised by the environmental coalition made some experts to suggest that Polish forestry was increasingly coming back to the old priorities, dominant before 1989. As argued by an interviewed forestry expert: *“Nowadays, looking at practice, it seems that the resource-oriented model of forestry has returned and that the goal of forestry policy is to produce as much wood as possible. Of course, attempts are being made to combine this or to dress it up nicely in the robe of increased carbon accumulation in the wood mass. [But] this desire to maintain this traditional model comes out from under every fold of this dress”* (Policy advisor 2). One of the results of this approach, as suggested by some interviewees, was the increase of the volume of harvested wood in Poland from around 25 million m<sup>3</sup> of wood in the mid-1990s to around 45 million m<sup>3</sup> in 2022. Although representatives of SFH and forestry scientists argued that this growth was accompanied by growing volume of trees in forests and increasing average age of trees, the perception that Polish forests were over-exploited became widespread and sustained by statements of NGOs and some high-profile opposition politicians. This was also strengthened by well-publicized information about the large-scale logging of old trees in country's biodiversity hotspots (e.g. the planned Turnicki National Park in SE Poland). Consequently, as admitted by an interviewed forester: *“We have now a stage in Poland that [forest] harvesting is socially opposed. There is no harvesting [in societal view] but predatory forestry”* (Forester 1).

The growing levels of harvesting became increasingly visible for the local communities living in the vicinity of the forests during the pandemic of Covid-19. This was connected with more frequent visits to local forests by these communities as well as by the increased use of second homes in the rural areas by urban residents, often with high economic, social and cultural capital (Niedziałkowski and Chmielewski, 2023). These groups started challenging local forest management demanding access to information about the forests and their use, as well as expecting participation in the decision-making. However, local foresters were often not ready for this sort of collaboration, as pointed by an interviewed forester: *“often foresters don't get into the subject at all, they don't try to discuss, they don't try to talk to these people, they just know that they know better and there is no point in talking at all. Well, this then has a negative resonance. It's obvious that a simple person who lives somewhere nearby won't be too interested, but an educated person from a city who comes here and starts asking ‘Why? But here there is this [issue] and this [issue]’. If it turns out, God forbid, that [this person] has a degree in natural sciences, (...) then it appears that this forester, for example, lacks arguments and a certain conflict arises. There may also be aggression. (...) a series of such incidents, I suppose has influenced the negative perception of SFH”* (Forester 4). Such communication problems accompanied by the decreasing trust and social legitimacy of SFH, contributed to the quick growth of bottom-up initiatives regarding forest management that were alarming local communities about forest logging and challenging management practices of SFH. These initiatives, networked under “Forests and Citizens” umbrella, grew from 290 in early 2022 to more than 440 in 2024. Many of those initiatives criticizing SFH involved local authorities, traditionally perceived as a part of the forestry coalition (Niedziałkowski and Chmielewski, 2023).

The wood industry also became increasingly critical of the directions

of forest policy under SolPol's lead. In October 2022, during a joint press conference, the representatives of the wood industry presented “A critical position of professional organisations towards the decision of SFH”, which included a long list of problematic issues regarding Polish forest policy (PIGPD, 2022). The industry strongly criticized changes to the system of wood sale introduced in 2021 without consulting the industry that, in the view of its representatives, made the system non-transparent, opened the wood market in Poland to foreign companies, skyrocketed prices of wood, and increased export of non-processed wood outside the EU (particularly to China). Additionally, as argued by the industry during the conference, the supply of wood was limited by “uncontrolled burning of quality wood by the subsidised energy industry” that could pay much more for the wood than the wood industry (PIGPD, 2022). Consequently, due to growing prices, Polish producers of wood products were apparently losing competitive advantage over western-European ones and their sales were plummeting. This was further strengthened by the fact that the SFH regional directorates were gradually discontinuing their FSC certification. As claimed by the producers of wood-derived products: *“If we do not have this certification, our supply chain is broken and our products leave the market (...). With decisions like this, SFH closes the way for our products to the world's trade networks”* (PIGPD, 2022). An interviewed industry representative argued that the FSC was viewed by top representatives of SFH as superficial “marketing agency” and that the Sol-Pol vice-Minister of Environment and Climate was accusing supporters of FSC of being “lobbyists and agents of German interests” due to the fact that the office of FSC International is located in Bonn. As stated by the interviewee, the representatives of SFH were suggesting that *“German citizens would not tell them what is good for Poland and that they know better”* (Industry 2).

The industry representatives also felt ignored by the decision-makers who did not propose any long-term strategy of wood supply for domestic producers: *“Today, the industry has practically no influence over forest policy (...). We do not feel that we participate, that we have a real impact on what is happening in forests, on future policies and strategies”* (Industry 3). They complained that this was happening despite the fact that when the Ministry and SFH had asked them to participate in the consultation process of EUFS *“we stood up, so to speak, to fight and we even activated not only organisations, but plants and people and employees (...) and we made that turnout”* (Industry 2). In the view of one of the interviewees, the government of the “United Right” failed to act when the EUFS had been prepared and to cover that they started blaming the EU and other groups: *“If we [Poland] were not able to make comments and demands [regarding EUFS] and do not feel that we have ownership, then that is a failure. It means that we need to get down to work quickly, or change the team and put in place people who are conscious, responsible and who share certain values (...). And not this kind of insulting and finger-pointing that it [EUFS] came from outer space somewhere. It doesn't explain anything to me. It is downright irritating (...). This is not how anyone pragmatic and responsible (...) thinks. It is simply a retreat, an attempt to explain away one's own indolence and lack of ideas about how to create the future”* (Industry 2).

The authoritarian rule in forest policy contributed thus to compromising the unity within the dominant forestry coalition. What is more, it seriously affected social legitimacy of the key vocational group in the sub-system – foresters. As pointed out by an interviewed forester: *“The public credibility of the SFH is a problem (...) and it's really a challenge to rebuild it. Ten years ago, we had, as it were, the second profession after firefighters in terms of public trust. At the moment this data (...) is not published. Perhaps there is nothing to brag about (...)”* (Forester 4). This moved some foresters to unprecedented actions during the election campaign. In October 2023, a few self-referred ‘real’ foresters (meaning not political nominees without the proper professional background) took part in the political rally of the leader of opposition Donald Tusk. Standing beside him in their forest uniforms they claimed that *“most foresters are intimidated and paralysed by the prospect of losing their jobs and housing. The community is politicised as never before”*. They declared that they were: *“ready to develop and implement a long-term state strategy for*



SFH that takes into account the needs of the national economy and the protection of forests in the energy transition; (...) ready to reach an agreement with environmental NGOs, (...) prepared to work in partnership with the wood industry and forest service sector, (...) as we are concerned, indeed appalled, by the amount of timber exported, unprocessed, from our country (...). We, the real foresters, (...) are in favour of part of the forests being put out of production (...). And we want to do that, together with you, with the public, with your consent.” As a result of this political developments, both governmental and oppositional parties were running the election campaign under the banner of “protecting Polish forests” (see Fig. 1).

Following the general elections of 15 October 2023, the opposition parties gained the majority of seats in the Polish Parliament and formed a new government with Donald Tusk as the Prime Minister. In the coalitional agreement the parties stated that “the Coalition will take decisive measures to improve the level of protection of Polish forests (...). 20% of the most valuable forest areas will be excluded from logging, the export of unprocessed timber will be restricted, and timber will serve primarily Polish entrepreneurs. We will ban the burning of wood in the industrial power plants. We will establish social supervision of forests and implement a program to restore marshes and peatlands. We will increase the area of national parks in consultation with local communities”. Donald Tusk, during his exposé declared that he wanted “Polish families to see what a real forest looks like. A forest is not timber management. The forest is a sacred national resource”. He also suggested that “the expectations of the new SFH leadership are clear and are primarily related to the great need for genuine, social control, social oversight of what happens to our forests”. These expectations were to be met by a new SFH Director General, appointed in January 2024, who was among the ‘real’ foresters taking part in Tusk’s political rally. The new Minister of Environment commented this appointment as “a day when SFH starts a new way of thinking about forests”. Among the

priorities for his office, the new Director General pointed to the strategic challenges faced by SFH connected with climate change and the social expectations. The new leadership of the Ministry of Environment also decided to immediately halt logging operations in 10 forest complexes, covering 1,5 % of the forests managed by SFH, because of their high natural and social values. SFH informed also that they “enter a new phase in negotiations with FSC International”, while two SFH regional directorates that had terminated the certification decided to prolong them (Gargul, 2024).

## 5. Discussion and conclusions

In the preceding section we described the responses of the Polish forestry subsystem to the EU’s political initiatives aimed at greater recognition of climate and biodiversity goals in forest management. As expected following the structure of the dominant interests in the Polish sub-system and the traditional positioning of Poland in the European coalitional dynamics among countries supporting active forest management (Sotirov et al., 2021), the prevailing reactions were negative. The most important organisation in the subsystem – SFH – did not see the rationale for changing its forest management practices, traditionally viewed as optimal and exemplary, and providing the organisation with appropriate economic and political resources (Konczal, 2017; Lawrence, 2009). The strong position of SFH and the consistent support it enjoyed from policy-makers made the arrangement similar to a “policy monopoly” (Baumgartner and Jones, 2009) – characterised by a well-defined organisational structures in charge of policy making that limit access to policy processes, as well as containing a powerful “policy image” associated with these organisational structures (or core beliefs in ACF’s terms). In the Polish case this policy monopoly involved the forestry advocacy coalition, dominated by foresters from SFH, who promoted an idea of sustainable and multi-functional active forest management reconciled economic, social and ecological goals related to forests. As posited by ACF, the coalition defended their core beliefs and resisted both new actors (e.g. NGOs, EC), new ideas these actors promoted that challenged foresters’ core beliefs (e.g. value of non-intervention areas), and new venues which offered new actors more leverage (e.g. courts).

The stability of the existing path of forest policy was undermined by a series of events that, following ACF, can be interpreted as external and internal subsystem events. The former included the Covid-19 pandemic, the implementation of EU’s climate change and biodiversity policies (EGD, EUBS, EUFS), and changes in the governing parties. While they all contributed to the dynamics of the subsystem, the political changes proved crucial. First, this was connected with the impact of the authoritarian characteristics of decision-making in 2015–2023, which impacted the internal cohesion of the forestry coalition and the professional group of foresters themselves. Here, the external dynamics influenced the internal one. As suggested by Nohrstedt et al. (2023) different internal events (e.g. crises, policy fiascos, scandals, and policy failures) may impact beliefs and focus critical attention on existing policies. The politicization of forest policy and management driven by resource nationalism (Conversi, 2020) and the willingness to appeal to the more economically challenged, less educated and mainly rural part of the Polish population (Žuk and Žuk, 2024) contributed to exclusion of other groups of actors (particularly those associated with urban elitism), strong pressure on economic outcomes benefitting only the dominant group, and numerous scandals reported by media reinforced the conflictual features of Poland’s forest policy. This, in turn, weakened the integrity of forestry coalition, and contributed to the perception of internal crisis of the policy subsystem, also among foresters who observed declining legitimacy and social prestige. The fading public image of “multifunctional sustainable forest management” increased the appeal of other policy options, particularly those promoting designation of forest areas for ecological and social purposes with limited or no productive functions. At the same time, autocratic policy-making set forestry issues in a clear-cut political optic – government (forest



Fig. 1. A political march in support of the opposition. The t-shirt reads “Hands off the forests!” (Photo. K. Niedziałkowski).

coalition) versus opposition (environmental coalition), thereby opening the way for major policy changes in case of the external event of changing governing parties.

The general elections of October 2023 and the following collapse of the autocratic government provided an external stimulus for a policy change. A “window of opportunity” (Kingdon, 2011) opened, when three “policy streams” coinciding: a political stream, connected with the changes of the government; a policy stream, connected with new policies from the EU level responding to climate change, biodiversity, and social expectations regarding forest; and a problem stream that put climate change impact on forest sustainability on top of policy priorities. However, despite existing opportunities and enabling factors one can speculate that the dominant coalition will not be replaced. Much more likely is a negotiated agreement (Koebele and Crow, 2023) that would produce some level of policy change (e.g. connected with new set-asides, increased participation, FSC certification, and greater focus on climate change mitigation and adaption in forest management), rather than a major change of core beliefs undermining the direction of forest policy in Poland. Wood harvesting will remain the focus of forest policy as long as it brings the vast majority of SFH's incomes and provides raw materials for the economically important wood industry in Poland. What is more, the core belief in “multi-functional sustainable forest management” seems not to be challenged among foresters, as admitted by the new Director General of SFH (Gargul, 2024). The criticism of ‘real’ foresters concerned excesses of the autocratic rule, rather than the core beliefs underlying the functioning of SFH. Consequently, SFH seems to be rather engaged in intensive damage control through strategic policy-oriented learning, revising its policy preferences and problem perceptions but, as suggested by Sabatier and Jenkins-Smith (1999), focusing more on secondary beliefs. Thus, our results offer a rarely discussed aspect of policy-oriented learning. While the ACF literature, when looking for features facilitating learning tends to focus on the levels of conflict that facilitate learning, the structure of networks in the subsystem or the existence of collaborative venues (Nohrstedt et al., 2023), we point out the relevance of external shocks (i.e. significant and abrupt changes in the socio-political or environmental context of the subsystem) for stimulating policy-oriented learning, viewed as a damage control mechanism on the part of the dominant actors who need to respond to new policy stimuli in the transformed socio-political context.

In terms of the impact of autocratic rule on forest policy, our study identified similar impacts as those found in other countries under the authoritarian rule: the reluctance to engage in supranational environmental initiatives, logging of forests of high ecological value, emphasis on economic benefits and higher yields, and closing of decision-making to environmental actors. Unlike in many non-European countries where autocratic governments have enabled deforestation (Dutta and Nielsen, 2021; Tomsa and Bax, 2023), in Poland this was not the case. This can be associated with the strong legal protection of forests against development and the importance of sustaining and developing forested areas plays in the core beliefs of foresters. However, similarly to Turkey (Atmiş and Günşen, 2018), although the forested area grew and forest policy was portrayed as outstanding by government officials, increased levels of harvesting and their impact on forest ecosystems caused concern among environmental actors that were excluded from decision-making. There were also instances where large sections of public forests were removed for the purpose of mega-projects characteristic for autocratic governments, e.g. around 300 ha of forest was cleared for the purpose of the construction of an electric vehicle factory IZERA, hailed as a potential object of national pride, fostering “economic independence” from the West, that in the end failed to materialise (Lis and Szymanowski, 2022).

Politicization of the forest service that entailed the use of the resources of the forest agency for party purposes and the introduction of the system of promoting employees based on party affiliation rather than professional turned out to be an important feature rarely mentioned in studies concerning forest policy under the autocratic rule.

Politicization, understood as “the substitution of political criteria for merit-based criteria in the selection, retention, promotion, rewards, and disciplining of members of the public service” can negatively affect efficiency of public organisations, contribute to the loss of confidence in their decisions, and limit their accountability (Peters and Pierre, 2004, p. 1). Also, political nominees may be more willing to follow politically motivated decisions which might infringe legal rules and professional ethics. The new Director General of SFH has already pointed to some legally dubious activities of some SFH employees associated with SolPol that require formal investigation. The role of politicization for the stability of forest policy could thus be considerable, as it undermines the legitimacy of the organisations both within and outside of the bureaucracy.

Delegitimised aspects of forest policy had to be corrected following the external shock of changing governing parties. The existing forest policy and the advocacy coalition that sustained it were put under significant pressure to align with the EU's climate and biodiversity goals. Thus, the autocratic episode has made the subsystem more open to these supranational stimuli than if the legitimacy of SFH had not been undermined. This aligns with the observations of Sotirov and Storch (2018) that shifts in forest policies towards integration of bioeconomy, biodiversity conservation, and climate protection goals are facilitated by coalitional politics and changes in external conditions, but also depend on a sectoral resilience, i.e. the ability of the subsystem to absorb pressures without giving up on its structural features. In Poland, this tension between external stimuli for a change and compromised internal resilience following the autocratic episode in forest policy creates a window of opportunity for the environmental coalition to press for changes in forest management. It remains to be seen if and how this opportunity will be used.

In conclusion, the study highlights the impact of the eurosceptic autocratic rule on the stability of forest policy in Poland and its openness to European forest policy initiatives. Initially, the negative perception of the European Green Deal rules strengthened the traditional policy path underlining domestic control over forest management and limited interest in climate change. However, the autocratic features of the government have undermined the legitimacy of the dominant actors in the subsystem and aligned their social perception with the ruling political option. The change of government improved the position of challenging groups, shifted the discourse of government representatives, and increased the potential for implementing European goals regarding forests and their adaptation towards climate change. The study also illustrates how the Advocacy Coalition Framework can facilitate tracing and interpreting the impact of the autocratic rule on forest policy by focusing on the changing relative position of competing groups of social actors within the policy subsystem.

Considering the above, the study has met the adopted research objectives. Although the authors have made every effort to carefully reconstruct the course of political processes and interpret them, certain limitations of the work should be considered. Firstly, for the sake of brevity, the study had to simplify the positions of stakeholders and the character of the relationships between them. Secondly, some of the autocratic features have been reconstructed based on the media accounts, which may be biased. Thirdly, the generalizability of the findings may be limited as they are informed by a specific context of Polish forest subsystem. This subsystem is characterised by a very strong position of the state and the public forest agency, which potentially make them particularly susceptible to changes in political context and social legitimacy. Therefore, we suggest that further studies analysing the impact of European rules and autocratization in other national contexts. Another potential research avenue involves investigating the direction and depth of actual forest policy changes following the government change in Poland.

#### CRedit authorship contribution statement

Krzysztof Niedziałkowski: Writing – review & editing, Writing –

original draft, Resources, Project administration, Methodology, Investigation, Funding acquisition, Formal analysis, Data curation, Conceptualization. **Agata Konczal:** Writing – review & editing, Methodology, Investigation, Formal analysis, Data curation, Conceptualization. **Marcin Mielewczyk:** Writing – review & editing, Project administration, Investigation, Formal analysis, Data curation.

## Declaration of competing interest

The authors declare that they have no known competing financial interests or personal relationships that could have appeared to influence the work reported in this paper.

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## Appendix A. Supplementary data

Supplementary data to this article can be found online at <https://doi.org/10.1016/j.forpol.2024.103402>.

## Data availability

Data will be made available on request.

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