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Alignment of National Forest Policy Frameworks with the EU Timber Regulation Requirements: Insights from Montenegro and the Republic of Srpska (Bosnia and Herzegovina)

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Abstract: The Western Balkans represent a priority area for improving forest legality monitoring systems in line with the European Union Timber Regulation (EUTR). However, research on EUTR implementation in Western Balkan countries is still sporadic with a limited geographical scope; therefore, the preparedness of forestry sector actors for the EUTR in the region is largely unknown. The main objective of this study is to determine to what extent the forest policy frameworks of Montenegro and the Republic of Srpska (Bosnia and Herzegovina) are aligned with the EUTR requirements. To achieve this aim, we applied a qualitative content analysis of policy documents identified via an expert-based approach. Our results show that both countries have well-developed policy frameworks addressing illegal logging and preventing illegal activities in forestry, especially through dedicated action plans. Key actors in both countries are public, including the ministries responsible for forestry, public forest enterprises, and forestry inspectorates. The forestry sector in Montenegro is facing significant changes due to the termination of forest concessions and the reorganization of the management of state forests, including forest certification. The Republic of Srpska has relatively well-established institutional bodies for EUTR implementation but, in some cases, insufficient exchange of information and cooperation among them. Our findings indicate that the forestry sectors in Montenegro and the Republic of Srpska (as well as in Serbia, Croatia, and Slovenia, as per previous research) are dynamic, undergoing various changes, so there is room for improvement in terms of capacities (e.g., human, technological, infrastructural), legal responsibilities, and information access and availability. With an increasing focus on “deforestation-free” commodities within the EU and global policy arena, a new, more demanding, and broader regulation is expected at the EU level, replacing the EUTR. The incoming regulation will expand existing EUTR requirements, likely posing severe challenges to many EU member countries. This could be even more challenging for countries with less developed or advanced systems to enforce legality requirements, including Western Balkan countries.

Keywords: forest policy analysis; timber legality; forestry sector; Western Balkan; EUTR



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1. Introduction

Despite all the efforts to address deforestation and forest degradation [1], unsustainable forest management practices and illegal logging remain a widespread problem [2], representing a major threat to the world's forests [3–5]. Fuelwood and industrial wood harvesting and trade have been identified as direct deforestation and forest degradation drivers [6,7], and their impacts are emphasized by illegal practices often associated with them [8]. To prevent imports of illegally sourced timber and timber products, the European Union (EU) adopted the EU Timber Regulation (EUTR) in 2013, which addresses the demand side of timber supply chains (importing EU countries). The EUTR prohibits the

export of illegally harvested timber and timber products on the EU market by laying down three main obligations for operators, i.e., prohibition, due diligence, and traceability [9].

Legislation banning illegally logged timber and related products entering the EU should safeguard the sector from illegal trade and make up part of the regulatory framework that promotes sustainable forest management [10]. However, despite the EU's efforts to stop the flow of illegally sourced timber and timber products, it is difficult to derive definite conclusions on the effects of the EUTR [11]. Although changes in timber trade patterns have been observed, e.g., under the form of reduced EU imports of tropical timber, this does not allow the conclusion that EU member states have reduced illegal timber imports nor that illegal logging activities have diminished in producing countries, as the illegal timber could have been diverted to other less regulated markets [10,12–15].

Illegal logging remains prevalent in developing countries where corruption coupled with inadequate forest governance leads to significant illegal practices and associated trade flows [2,15]. While much of the world's attention remains focused on the large-scale destruction of tropical rainforests in South America and Southeast Asia, illegal logging and deforestation/forest degradation processes occur in economically unstable Southern and Eastern Europe [16]. Segato [17], for example, reports that the Balkan countries comprise a corridor for illegal timber trafficking. "A complex supply chain makes it difficult to identify falsified documents, and the lack of robust enforcement—due to insufficient resources—and the cost of compliance to companies means that there is little incentive to adhere to the EUTR. A better understanding of the EUTR, as well as more stringent due diligence systems and risk assessment, is needed to tackle corruption in the region" ([17], p. 13).

In light of these risks, some Western Balkan countries (i.e., Serbia, Bosnia and Herzegovina, and Montenegro) are recognized by the European Commission as priority countries for the implementation and enforcement of the EUTR. Although Western Balkan countries are regarded as priority areas for improving legality monitoring systems in line with the EUTR requirements and aims, up-to-date research on the transposition of EUTR requirements into forest policy framework conditions in these countries is still patchy and has several gaps. Regarding Southeastern Europe, researchers mostly looked into forest certification as a means for sustainable forest management [18,19], including chain of custody certification [20] and trade of timber and timber products [21]. A limited number of studies (e.g., [22–24]) analyzed the adaptation of national forest policies to the EUTR obligations or forest governance.

Our study aims to contribute to the knowledge base on timber legality in the Western Balkan region by analyzing the adaptation of policies of two Western Balkan countries—Montenegro and the Republic of Srpska (the Republic of Srpska is one of the two entities of Bosnia and Herzegovina, the other one being the Federation of Bosnia and Herzegovina.)—to the EUTR. For this purpose, we investigated to what extent the national forest policies of these two countries aligned with the requirements of the EUTR.

In Section 2, we briefly present the Western Balkan region in relation to illegal activities in forestry, while in Section 3, we describe the research methodology. In Section 4, we provide some basic data on the forestry sector for the two selected countries. In Section 5, we present the results of our research, whereas Section 6 discusses the findings, broadening the scope to other Western Balkan countries (namely Serbia, Croatia, and Slovenia) and the relevant literature. Finally, in Section 6, we draw conclusions and recommendations for policy and practice.

Illegal Forestry Activities in the Western Balkan Region

Geographically, the Western Balkan region comprises Bosnia and Herzegovina, Croatia, North Macedonia, Serbia, and Montenegro, all being former republics of the Socialist Federal Republic of Yugoslavia (in short, Yugoslavia) and Albania. Geopolitically, including Slovenia, these countries represent a region with a complicated recent history. After the fall of Yugoslavia and the socialist regime, all these countries have been experiencing drastic

changes in their society, resulting from the strong transition towards a market economy and modernization [25].

The Western Balkans are known as an area exposed to a high risk of corruption [16,26,27], with illegal activities being recognized as one of the key problems for the forestry sector in the region [24,28]. In the Western Balkan countries, activities such as illegal logging by local communities, corruption, nepotism, and preference for certain contractors are still regarded as highly relevant and damaging issues for the forestry sector [28]. Several countries, including Montenegro (45), Bosnia and Herzegovina (34), and Serbia (36), show a Corruption Perception Index lower than 50 and might be associated with a higher corruption risk [29].

The Balkan region has a substantial forest stock in the European context and a high share of virgin and old-growth forests [30]. This is due to the Balkan's mountainous topography, relatively low population density, as well as the below-average intensity of economic exploitation [31]. In this region, forest vegetation has been greatly modified and often degraded through agricultural practices such as grazing [32,33]. This forested region is the largest contiguous forest area in Central Europe, providing an important habitat for many endemic [34] and endangered species, including large predators such as the brown bear (*Ursus arctos* L.), wolf (*Canis lupus* L.), and lynx (*Lynx lynx* L.). The area is characterized by high altitudes, steep slopes, rocky conditions, and a lack of surface water that made the area generally unsuitable for colonization, except for the karst valleys. Because of the difficult terrain in the Dinaric Mountains, large forest areas have been managed with low intensity. In contrast, the Mediterranean part of the Dinaric region was colonized very early and has traditionally been more densely populated. As a result, woodlands are considered a key natural resource, and forestry and forest management practices have a long and relatively well-documented history, at least since the second half of the nineteenth century [34]. Under communism, the Balkan states treated forest areas as an important national heritage and economic asset, with the state acting as the sole owner and manager of forest resources [35]. This was supported by the widespread nationalization of forest land after World War II. Although the state is still the dominant forest owner in most of the region, public forest administrations in the Western Balkans were challenged when facing novel forest policies following the breakup of Yugoslavia in the 1990s. Research on private forest owners and stake actors [35,36] argued that newly established forestry legislation in most of the ex-Yugoslavia countries is not adequate for the management of private forests, as it is predominantly oriented towards the administration needs of state-owned forests.

Additionally, with high growth stock, the Balkan region has a strategic geographic location for the trans-shipment of timber and timber products into the EU, the Middle East, as well as other countries/regions, which is facilitated by the infrastructure of roads and railways as well as seaports on the Black Sea and Mediterranean [21].

Except for Slovenia and Croatia, which are EU members, all other countries within the region are part of the EU special process for the Western Balkan countries, known as the Stabilization and Association Process (SAP) [37]. This is based on several instruments such as stabilization and association agreements, trade concessions or economic, financial, and other types of assistance from the EU, which should contribute to the stabilization of the region and eventually lead to membership of the EU. In addition, the Western Balkan countries already became potential candidates, meaning they should be offered official candidate status once they have officially complied with SAP requirements [38].

Both Montenegro and the Republic of Srpska are still in the pre-accession process to the EU. Accession negotiations with Montenegro were opened in June 2012. To date, 33 negotiating chapters have been opened, of which three have been provisionally closed. Montenegro accepted the revised enlargement methodology. It continued to implement the Stabilization and Association Agreement (SAA), and meetings of the joint bodies under the agreement took place at regular intervals [39]. The proper functioning of Montenegrin institutions has been affected by political volatility, government instability, and tensions within the ruling majorities, stalling decision-making processes, and reform implemen-

tation. Overall, limited progress has been made, including adopting the new 2022–2026 strategy for public administration reform. The green agenda and the sustainable connectivity cluster are at the heart of the Green Agenda for the Western Balkans and are closely linked to Montenegro's economic reform program and the Commission's Economic and Investment Plan [40]. The SAP process will create new opportunities and challenges to provide products to the EU market, including quality timber at competitive market value with the required standards for sustainability.

2. Materials and Methods

This explorative, descriptive study is an extension of previous research on the policy framework for EUTR implementation within Western Balkan countries, targeting Slovenia, Croatia, and Serbia [22]. By adopting a multiple, embedded comparative case study approach [41], we extended the case study area to Montenegro and the Republic of Srpska, thus covering a wider range of economic, social, and policy conditions [42] compared to the original study [22]. The two countries targeted by this research present differences concerning the forestry sector and the management of domestic forests. While the Republic of Srpska exports a large proportion of its timber and timber products to neighboring and some EU member states, Montenegro is not a large exporter of timber to the EU market. However, Montenegro represents an interesting case study due to the high forest coverage and because it is currently in the process of reformulating its forest policies and restructuring the national forestry sector.

Data Collection and Analysis

We focused on the content of policy documents relevant to the legality of timber and timber products. National policies and regulations related to the prevention and tackling of illegal logging, as well as those dealing with the trade in timber and timber products in the Republic of Srpska and Montenegro, were collected via a literature review and an internet search in May 2022.

Following [22], the starting point for identifying relevant policy documents was the websites of Ministries responsible for forests and forestry in the two selected countries. These websites contain lists of policy and normative documents guiding the national forestry sectors. After compiling an initial list of documents for the two targeted countries, other relevant websites were searched, including, among others, the websites of the state forest enterprises, chambers of forestry engineers, associations of private forest owners, etc. Finally, a Google search was used to find other relevant policy documents in national languages, using a combination of keywords, i.e., "Republic of Srpska", "Bosnia and Herzegovina", "Montenegro" and "illegal logging", "wood processing", "timber trade", "European Union Timber Regulation" and "forestry documents". Existing studies and reviews about the policy and normative framework on illegal logging in the two countries, such as [43], were also considered. In total, we identified seven policy documents in Montenegro and five in the Republic of Srpska. If policies and regulations were not available for consultation through the above-mentioned sources, the relevant institutions were contacted and asked for the documents. The final list of documents was validated by key informants in each country.

Using the same qualitative content analysis method adopted by [44], policy documents were analyzed using the software NVivo 12. All documents were coded in the relevant national language. Coding was performed by using a combination of deductive and inductive coding, distinguishing between coding categories and themes. Based on the content of Regulation (EU) No. 995/2010 (EUTR), five main coding categories and their respective themes were deducted (Table 1). During the coding process, several themes that emerged as relevant for EUTR implementation were added inductively. Whole paragraphs of the text were coded under relevant themes, and multiple coding of paragraphs was allowed.

Table 1. Deductive and inductive coding categories and themes.

No	Coding Categories	Coding Themes	Code Type	Coding Rules/Explanation
1	EUTR	International commitments	Deductive	Explicit or implicit referral to the EUTR
		Forest protection	Inductive	Referral to forest protection against negative human influences
2	Prohibition	Planning	Inductive	Referral to planning documents about felling, wood transport, or record keeping
		Illegal activities	Deductive	Explicit mentioning of illegal activities of relevance to the EUTR
		Felling	Deductive	Explicit mentioning of felling requirements
		Felling of protected species	Deductive	Explicit mentioning of felling requirements for protected species
3	Due diligence	Certification	Deductive	Explicit mentioning of forest certification
		Wood products	Inductive	Referral to wood products certification or trade
		Wood transport, processing, and storage	Deductive	Explicit mentioning of the requirements for wood transport, processing, and storage
4	Traceability	Record keeping	Deductive	Explicit mentioning of required records
		Information	Inductive	Referral to accessibility and transparency of information
5	Enforcement	Competent authorities	Deductive	Explicit mentioning of competent authorities
		Monitoring	Deductive	Explicit mentioning of monitoring activities
		Sanctions	Deductive	Explicit mentioning of sanctions, fines, and other restrictive measures

Source: Updated from [22].

3. Forestry Sector in Montenegro and the Republic of Srpska

Within this section, detailed information about forestry and the forestry sector in Montenegro (Section 3.1) and the Republic of Srpska (Section 3.2) is provided.

3.1. Montenegro

Although Montenegro covers a relatively small area, it is considered a forest-rich country. Montenegro's land area has a 59.9% forest coverage (826,782 ha) and 9.9% of forestland (137,480 ha): forest and forestland together cover 69.8% (964,262 ha) of the country's land area. The estimated total wood volume in Montenegro's forests is 122 Mio m³ with an annual increment of 2.9 Mio m³ [45]. According to FAO [45], about 52.3% of forests are state-owned, while the remaining 47.6% are privately owned. About 41% consist of conifer forests and 59% of broad-leaf forests [46]. The average standing volume per hectare was estimated to be 159.8 m³/ha, while the total annual volume increment was 2.9 Mio m³ [45].

In Montenegro, illegal activities are mainly related to the existing system of granting and control of concessions, with the most common being logging in excess of quota or logging outside a concession area [47–49]. The most common type of illegal activity in Montenegrin forests, after illegal logging, is the usurpation of state forests or forest land

(usually for construction) [50,51]. In 2019, there was 6037.50 m³ of illegally logged wood in the state forests and 436.08 m³ in private forests [43].

3.2. Republic of Srpska

The forestry sector is very important for the national economy of the Republic of Srpska. Forests and forest lands cover approximately 50% of the national territory and are pivotal among the country's natural resources and green infrastructures. Approximately 80% of forests and forest lands are owned by the state, while the remaining 20% are privately owned [52,53]. In general terms, the jurisdiction for the forestry sector in the Republic of Srpska is in the hands of the Ministry of Agriculture, Forestry, and Water Management. Within the ministry, the Forestry Department has responsibility for various administrative and management activities, including the production and sale of seeds and genetic materials; growing, protection, management, and improvement of forests; increase in forest productivity, exploitation of forests; afforestation of degraded forest land and coppices; communication in forestry; hunting; and inspection supervision in the forestry and hunting sectors.

Illegal logging is recognized as a serious problem in the forestry sector in Bosnia and Herzegovina. According to [54,55], the amount of illegally harvested wood from Bosnia and Herzegovina has been estimated to be 1.2 million m³, while the official statistics reported on average 92,977 m³/annually of timber illegally harvested in the 2014–2018 period [43]. Available data on illegal logging usually refer to violations that involve material removal of trees, i.e., theft and unauthorized harvesting. Another aspect of illegal activities involves corruption and nepotism in the forestry sector [28]. Tracking the specific case of illegal logging is difficult due to the lack of consolidated data, suggesting a lack of strong enforcement. "In general, Bosnia and Herzegovina lacks implementation measures aimed at combating corruption in the forest sector. So far, corruption is being tackled through internal programmes at the cantonal level in the Federation Bosnia and Herzegovina. The measures are primarily focused on formal company commitments and the development of internal structures within companies to prevent and combat corruption and continued efforts to educate and disseminate information on the importance of tackling corruption" ([43], p. 26).

4. Policy Framework Conditions for Implementation of the EUTR Requirements

This section presents the results of the analysis of relevant policies linked to the EUTR implementation in Montenegro (Section 4.1) and the Republic of Srpska (Section 4.2).

4.1. Montenegro

For Montenegro, we identified seven policy documents relevant to the implementation of the EUTR (Table 2).

Table 2. Relevant policy documents for the implementation of the EUTR in Montenegro.

Document	Year	Responsible Body	Document Type
Action plan for prevention of illegal activities in forestry for the period 2019–2021	2019	Government of Montenegro	Action plan
Strategy with forestry development plan 2014–2023—National Forestry Strategy.	2014	Ministry of Agriculture and Rural Development	Strategy
Revised Forest Strategy 2018–2023	2018	Ministry of Agriculture and Rural Development	Strategy

Table 2. *Cont.*

Document	Year	Responsible Body	Document Type
Program for restructuring concession use of forests	2020	Ministry of Agriculture and Rural Development	Program
Forest Law, “Official Gazette of Montenegro”, No. 74/2010, and 47/2015	2015	Government of Montenegro	Law
Action plan to meet final benchmarks for Chapter 27	2021	Ministry of Ecology, Spatial Planning, and Urbanism	Action plan
Industry policy 2019–2023	2019	Ministry of Economy	Strategy and action plan

Source: Own elaboration.

As Montenegro is not an EU member state, it did not translate EUTR obligations into policy and regulatory documents. In this regard, identified categories in the six policy documents were identified as being implicitly or explicitly relevant to the EUTR (Table 3).

Table 3. Identified EUTR categories in Montenegro policy documents and the number of coded parts (references) for each of them.

Document Short Title	EUTR Commitments	Prohibition	Due Diligence	Traceability	Enforcement
Action Plan for preventing illegal activities	2	11	11	0	18
Chapter 27 Action Plan	4	2	1	1	3
Industry Policy 2019–2023	4	7	7	0	1
Forest Law	1	17	10	2	15
National Forest Strategy	4	30	21	1	7
Draft Revised Forest Strategy 2018	6	12	8	1	4
Program for Concession Restructuring	0	7	8	1	3

Source: Own elaboration—NVivo matrix Query.

4.1.1. EUTR Commitments

Illegal logging in Montenegro seems to attract great political attention. It is officially recognized as an important forestry and economy problem in the Action Plan for combating illegal activities, which should contribute to finalizing the overarching National Strategy for Sustainable Development (NSOR 2030). The EUTR is implicitly addressed by all targeted documents through statements related to international obligations and timber legality. In addition, the EU Common Position for Chapter 27—Environment and Climate Change defines the benchmarks Montenegro needs to achieve to ensure the transposition and implementation of the EU acquis within the environment and climate change domains. It explicitly states that “The EU reminds of the need to order nuisance authorities in accordance with EU regulations on timber and the implementation of the Forest Management and Trade Act (FLEGT)” ([56,57], p. 99). Aligned with this purpose, planned activities include the reorganization of the forestry sector of Montenegro, as well as the adoption of the amendments to the Forest Law.

4.1.2. Prohibition Requirement

The Action Plan is related to the EUTR prohibition requirement as its goal is “to oppose all forms of illegal activities in forestry, including forest theft and illegal occupation

of forest land, the deliberate setting of forest fires, destruction of border lines between state and private forests, corruption in forestry, with a special emphasis on illegal activities in the forest use authority and traffic in illegally cut wood" ([39], p. 2). The Action Plan defines three broad types of measures:

- preventive measures aiming to prevent the occurrence of illegal activities;
- monitoring and detection aiming to promote active monitoring and detection of illegal activities;
- repressive measures aiming to ensure that perpetrators of illegal activities are prosecuted and punished in an adequate manner.

It further describes in detail operational objectives, the current and desired state of forests in 2022 and 2023, together with activities needed to be undertaken under each objective. For each activity, the Action Plan [39] stipulates indicators with responsible bodies, timelines, and resources. The Action Plan also defines spatial zones with a high risk of illegal activities. One of the major activities related to the prohibition requirement is awareness raising on shared responsibility for forest protection and illegal activities targeting the general public and improving capacities (e.g., human, technical, financial) of public institutions.

Article 33 of the Forest Law [47] defines illegal forestry activities, including destruction and clearing of forests; clear-cutting of forests and high-intensity cutting that is not planned as a regular form of forest restoration; and felling that is not in accordance with forest management planning. Article 53 of the same Law states that "Trees may be cut only after they have been selected, marked and recorded (receipt) in accordance with the forest management program, the forest management plan in private property and the contractor's project" [47].

4.1.3. Due Diligence Requirement

With respect to due diligence requirements, Article 56 of the Forest Law [33] stipulates that moving wood assortments from the felling site can only be done after "the reception" which includes measurement, recording, and marking of wood assortments (with a stamp, bar code, etc.). It is carried out by the competent authority of the administration (currently forest administration within the ministry responsible for forestry) through the reception book, the extract of which is presented as a certificate of origin for timber assortments. Timber assortments in transport and trade must be accompanied by the above-mentioned certificate of their origin. The transport, processing, and storage of forest products that are not marked as prescribed are prohibited.

The program for the reorganization of forest concessions directly addresses the procedures for timber felling, transport, and trade in relation to the planned structural changes. It stresses that the new organizational model will have an extremely reduced administrative capacity to perform operational tasks, such as receiving requests and issuing decisions for felling and issuing certificates of origin for private forests [56].

Strategic policy documents (e.g., Forest Strategies, Industry Policy, etc.) recognize the importance of forest management certification for value-added timber products, the reduction of illegal logging, and supporting exports towards the EU [57,58], "despite the fact that relatively small quantities of wood are exported from Montenegro to the EU market" [59]. In addition, the Action Plan for Chapter 27 lists activities needed to fulfill the requirement for strengthening capacities and improving the legislation related to forests by defining the institution responsible for monitoring and issuing certificates of timber origin ([41], p. 5), which should be done by adopting and implementing the program of reorganization of the forestry sector, and amendment of the Forest Law that were planned in 2022. The program for the reorganization of forest concessions stipulates that Montenegro šume should be responsible for the reception of timber assortments and issuing the certificate of origin in state forests. At the same time, registered legal entities will be responsible for the same activity for private forests. Although the program for reorganizing forest concessions was adopted in 2020, Montenegro šume is not yet established.

4.1.4. Traceability Requirement

The Forest Law prescribes that forest management plans are subject to public consultation and must be valid for 10 years. Article 25 of the Forest Law also prescribes the establishment of a forestry information system which should contain information about forests, forest lands, and clearings. In particular, the information system should contain data on the condition and changes of forest ecosystems, data collected through forest inventories, information on the forest infrastructure network, works performed in forests, and data on forest owners and users [47].

The Forestry Administration and Ministry of Agriculture and Rural Development do not yet have a functional system to exchange information, although its establishment was started a few years ago. The Revised Forest Strategy recognized the need for establishing a centralized information system that will connect the Forestry Administration (central and regional units) and the Ministry of Agriculture and Rural Development. The Revised Forest Strategy also states that “it is necessary to establish a Central Electronic Bidding System and control of the circulation of wood assortments, where the sale of wood in a deep state or cut logs at warehouses will be carried out transparently through an established business entity” ([41], p. 12). The program for reorganizing forest concessions assigns the responsibility for creating and managing a central information system to a Forestry Directorate after the system is reorganized ([40], p. 5).

The Revised Forest Strategy also states that “it is necessary to develop mechanisms for the sale of wood based on market principles in such a way that the Wood Exchange will be established, which will be supported by the state with strong regulatory functions, which will be implemented by the competent authority of the state administration. Also, all timber approved for felling (except for the own needs of private forest owners and state support for rural development) in an unprocessed state should be sold through the Exchange, which will be electronically linked with the Tax Administration and Customs” ([41], p. 21).

4.1.5. Enforcement

As Montenegro is not required to formally implement the EUTR, there are no competent authorities formally in charge of its enforcement. Nonetheless, in the wake of the Accession process, the new program for reorganizing forest concessions should define responsible bodies for EUTR implementation [38] (pp. 101–102). The program presupposes passing part of the responsibilities of the Forestry Directorate in terms of forest management and commercial activities in the state forests currently under concessions to the state forest enterprise Montenegro šume. Within this integrated model (Mne. integralni model), the administrative and management functions would stay with separate organizations [40].

Concerning monitoring, the Action Plan for Combating Illegal Activities in Forestry reports a series of activities that are mostly aimed at education and capacity building of personnel (i.e., traffic police, customs officers, inspectors), improvement of technical capacity (e.g., the introduction of bar codes for tracing the origin of wood), enhanced coordination between authorities and border control, defining of zones with high illegal logging risk, etc. The Forest Law stipulates that forest guards have the right and obligation to: legitimize persons caught committing illegal acts in forests; inspect the vehicles used to transport wood; inspect places, except apartments, where there may be timber that is the subject of a criminal offense or misdemeanor; perform temporary confiscation of illegally harvested timber and hand them over to the competent authority without delay; report on the illegal action and the established factual situation and submit it to the competent administrative body, and, if necessary, to the police and the competent inspection body. Forest guards must have at least a secondary vocational education in forestry, have passed a professional exam, and meet the conditions for carrying weapons in accordance with the law regulating the use of weapons [33] (Article 34).

In addition to forest guards, the Forest Law states that forestry inspection is carried out by the state body for inspections [33] (Article 86). The forestry inspectors employed by the state body for inspections are authorized to control: felling and all works in forests with

reference to legality issues, including compliance with plans and professional technical standards; origin of wood assortments and their traffic on forest roads; storage of forest assortments; fulfilling the conditions for carrying out works in forests (The professional-technical, technological and other conditions for natural and legal persons who perform activities in the forests are prescribed by the Forest Law (“Official Gazette of the Republic of Montenegro”, No. 074/10, 040/11, 2015, Article 87) as “Professional work in forestry can be performed by a legal entity who has at least one employed person with higher education in forestry with a license to perform professional work in forestry (license), who is registered in the Central Register of the Commercial Court and who meets the requirements in terms of equipment for performing that activity. The is acquired by a person with a higher education in forestry and at least one year of work experience in the profession, who has passed the professional exam for performing professional work in forestry. The license is issued by the ministry responsible for forestry.” (Article 67).); implementation of the procedure for land use change, i.e., clearing of forests; use of forests.

In the case that law violations or infringements are found, the forestry inspectors are authorized to (among other things): order the execution of planned and other necessary works, order the suspension of clear-cutting, high-intensity cutting (clear-cutting and high-intensity cutting are prohibited by the Forest Law (Article 33), except in the case of direct conversion of coppice forests and rehabilitation of forests from the harmful effects of natural disasters, plant diseases, and pests, if this is provided for in planning documents in forestry (Article 37). Clear-cutting is also allowed for the purposes of land use change if this is provided for in special planning documents (Article 38), and illegal tree cutting, clearing forests; temporarily confiscating illegally cut timber, timber and other forest products illegally appropriated or placed on the market, as well as means and objects used to carry out these actions; prohibit the performance of forest works by legal and natural persons who do not meet the conditions for carrying out works in forests provided for by the Forest Law [33] (Article 87). For infringements of the Forest Law, monetary sanctions are prescribed. The fines depend on the type of entity that commits a crime (physical person or legal entity). For physical persons, fines are from EUR 300 to EUR 1200, while for legal entities, these vary between EUR 2500 and EUR 15,000 [33] (articles 88–90).

4.2. The Republic of Srpska

For the Republic of Srpska, we identified five relevant policy documents for the implementation of the EUTR (Table 4).

Table 4. Relevant policy documents for the implementation of EUTR in the Republic of Srpska.

Document	Year	Responsible Body	Document Type
Forestry development strategy of the Republic of Srpska 2011–2021—draft	2011	Ministry of Agriculture, Forestry and Water Management	Strategy
Action plan for illegal logging	2019	Government of the Republic of Srpska	Action plan
Forest Law (75/08, 60/13, 70/20)	2020	Government of the Republic of Srpska	Law
Rulebook on the shipping form	2015	Ministry of Agriculture, Forestry and Water Management	By-law
Rulebook on tree marking	2021	Ministry of Agriculture, Forestry and Water Management	By-law

Source: Own elaboration.

Similarly to Montenegro, the Republic of Srpska did not translate EUTR obligations into policy and regulatory documents. Regardless, identified categories in the five policy documents can be implicitly or explicitly relevant to the EUTR (Table 5).

Table 5. Identified EUTR categories in the Republic of Srpska policy documents and the number of coded parts (references) for each of them.

Document	EUTR Commitments	Prohibition	Due Diligence	Traceability	Enforcement
Action plan for illegal logging	2	9	6	6	4
Forestry Strategy	8	3	18	0	1
Forest Law	9	50	14	3	25
Rulebook on the shipping statement	0	5	3	2	1
Rulebook on tree marking	0	8	0	3	0

Source: Own elaboration—NVivo matrix Query.

4.2.1. EUTR Commitments

The EUTR is implicitly addressed by all strategic and regulatory documents except by-laws, mostly through statements related to international obligations and timber legality. As reported within the Forest Strategy [60] that represents the basis for the national Forestry Development Programme [61], the Republic of Srpska is a signatory to many international conventions relevant to the field of protection and sustainable development of forestry and biodiversity conservation (e.g., Convention on Biological Diversity, General Guidelines for Sustainable Forest Management, the Pan-European Strategy for Biological and Landscape Diversity, Sofija, 1995, the Ministerial Conferences on Forest Protection and Protected Forests, etc.). The EUTR, however, is not explicitly mentioned in the strategy or any other analyzed document.

Illegal logging is officially recognized by the Forest Strategy as one of the priority issues to be addressed. The Forest Strategy prescribes basic guidelines to tackle illegal activities, referring mostly to regulatory instruments (e.g., it provides supervision of wood transportation and supply of raw wood materials for wood processing capacity) and networking instruments. As for the latter, they include, e.g., strengthening of intra-sectoral, i.e., between forestry companies and forest owners, as well as inter-sectoral cooperation, i.e., between the forestry sector and police forces, customs services, and the judicial system to combat illegal activities in the forest and forestry sector and for the detection of illegal exports and imports. To a lesser extent, the Forest Strategy refers to information policy instruments, i.e., it establishes a system for creating and disseminating relevant information on forest management and the sales of forest products.

The Action Plan for preventing illegal activities also highlights that these cause serious problems related to the theft of timber and timber assortments sale and resale from the buyer to the end user, which imposes a general conclusion that special attention should be paid to this problem by intensifying cooperation with the institutions of the system (police, inspectorate, prosecution, and court). Regardless of formal prohibition by law, the Action Plan for preventing illegal activities recognized that notwithstanding measures taken in the past, illegal logging and other illicit activities prevailed in two forestry districts (Jahorina and Romanija) [62].

4.2.2. Prohibition Requirement

The Action Plan for preventing illegal activities prescribes two main directions for fighting illegal activities:

- (1) Improvement of institutional cooperation and external support by strengthening inspection supervision through institutions that supervise legality in forests and

forestry, as well as institutional support of the ministry responsible for forestry and the Ministry of Internal Affairs;

- (2) Improvement of the organization of the public forest enterprise Šume Republike Srpske, a.d. Sokolac.

The Action Plan further defines four main activities with 21 sub-activities corresponding to the two above-reported main directions [62] and mostly related to monitoring and enforcing forest legislation. The prohibition requirement is met by the Forest Law [41]. In detail, Article 8 precisely defines illegal activities in forests in relation to property and use rights, quantity limitations, permits, illegal transport, and trade. Moreover, the Forest Law [41] (Article 41) prohibits:

- Felling that is not in accordance with forest planning documents;
- Felling in protected natural areas that are not in accordance with planning documents of protected natural areas;
- Felling and destruction of rare and protected species of trees, biotopes, habitats, and ecosystems, as well as the destruction of bush species and their natural habitats.

4.2.3. Due Diligence Requirement

According to the Forest Law [41] (Article 16), forest management (including felling) shall be done in accordance with forest management documents, including:

- (a) Forest management plan (“*šumska osnova*”) for the forest area;
- (b) Long-term karst area management program;
- (c) Industrial and other forest management investment programs for plantations (investment program of forest plantation management);
- (d) Forest management executive project (executive project);
- (e) Program for the use of other forest products.

Executive projects prescribe detailed measures for forest management and felling amount and are made by Šume Republike Srpske [41] (Article 23).

Forest felling must be done upon selection, marking, and evidencing of trees for felling—the remittance—and in accordance with the forest management plan and executive project. Remittance should be done in all forests by certified experts. In privately owned forests, remittances are made only to the owner who provides appropriate proof of ownership of the forest. The remittance is also needed for forest areas that are planned to be clear-cut or cleared and in cases where the felling is caused by natural disasters [41] (Article 69).

Before being placed on the market, timber must be stamped, numbered, and supplied with a shipping statement reporting the volume and type of assortment by wood species, quality classes, recording method, place and date of shipment, and expiration dates, as well as the method of transportation and place of shipment. Timber must be stamped in the forest where timber assortments are made [41] (Article 72).

The Action Plan for preventing illegal activities prescribes the introduction of mobile devices in the timber production process (receipt at the stump, on the truck road, in the shipment, etc.), as well as measures to tackle illicit financial activities, mostly at the organizational level in the forestry sector [42].

4.2.4. Traceability Requirement

The Action Plan for preventing illegal activities prescribes several measures for improving access to information, among which it mentions the establishment of “a system for collecting and disseminating relevant information on forest management and timber sales (e.g., list of areas planned for felling, list of buyers and quantities delivered to them, detailed annual report, etc.) in a form accessible to the public (e.g., on the Internet)” ([42], p. 5), as well as improvement of information sharing and coordination among the public forest enterprise Šume Republike Srpske, forestry inspection, traffic police, and the judicial system.

In alignment with the above, the Forest Law [41] prescribes the establishment of an information system in forestry, which is aimed to provide all necessary information about the current condition and changes of the forests of the Republic of Srpska for the purposes of planning, monitoring, and reporting. Forest management documents [41] (Article 76), as well as the Cadastre of forest and forest land [41] (Article 75), shall be kept permanently.

The origin of a tree is proven by the shipping statement and the existence of a stamp and number on the timber [63]. Timber found in transport without proof of origin is considered illegally cut [41] (Article 72).

According to the Forest Law [41] (Article 83), mechanical wood processing plants are prohibited from storing and processing timber if it has not been stamped in the manner prescribed by law and if no dispatch report or dispatch note has been issued. The owner of a plant for mechanical processing is obliged to keep records of timber bought and processed in the record book upon receipt and to certify the record book (book of receipt of roundwood) by the Republican administrative body responsible for tax affairs [41] (Article 72). Detailed regulations on the form and content of the forest marking, recording, method of registration and storage, shipping statement form, shipping note form, conditions, method, and the deadline for stamping and numbering by quality classes of felled wood are prescribed in the Rulebook on shipping statement.

4.2.5. Enforcement

Since the Republic of Srpska is not an EU member state and is therefore not required to formally implement the EUTR, there are no national authorities in charge of EUTR enforcement. The body that performs the administrative functions, which would be under the responsibility of a EUTR competent authority, is the directorate for forests within the ministry responsible for forestry. Inspectional obligations of competent authorities would be under the Republic Administration for Inspection Affairs, the Forestry and Hunting Inspection, and the Market Inspection.

The Forest Law [41] (Article 63–65) prescribes the obligations of forest protection against illegal activities in state forests by forest guards, and the Action Plan for preventing illegal activities prescribes that forest guards are constantly visiting their areas in order to prevent illegal logging and transporting of timber assortments [62]. For private forests, the Forest Law assigns the responsibility for forest protection to owners, while it grants the exclusive right to perform professional technical works within these forests to the public forest enterprise Šume Republike Srpske [41] (Article 39).

Supervision of timber transport is carried out by Šume Republike Srpske, forest guards, forestry and hunting inspection, and market inspection. Stamping of timber and issuance of a shipping statement for timber from state forests are performed by the public forest enterprise Šume Republike Srpske while stamping of timber and issuing of a shipment statement for timber from privately owned forests are performed by an authorized, certified professional. Stamping of timber and issuing a dispatch statement for timber originating from areas that are not considered forests should be performed by a professional technical contractor [41] (Article 72). The competent inspection body, as well as the public forest enterprise, has the right to confiscate timber that is placed on the market without any proof of origin.

The Action Plan for illegal activities mostly prescribes measures related to control and monitoring [42], including control of:

- The implementation of forest management planning (Measure 1.2);
- The implementation of work procedures and the execution of expert technical work by the public forest enterprise Šume Republike Srpske (Measure 1.3);
- Timber processing plants, compliance of documentation with assortments by type, quantity, and class in relation to the valid standards, including the correctness of the classification according to the numbers of the timber tags by sampling (Measure 1.4);

- Transport of timber assortments by comparing accompanying documentation with the actual condition of the specific cargo, especially during the night and non-working days (Measure 1.5);
- Control of forest districts (Measure 1.6).

For each of the above-listed measures, the Action Plan defines shared responsibilities between at least two public bodies [42]. For infringements of the Forest Law, monetary sanctions are prescribed. As for Montenegro, the fines depend on the type of entity that commits the infringement (i.e., physical person or legal entity). For physical persons, fines are from EUR 150 to EUR 450, while for legal entities, they vary between EUR 1500 and EUR 7500 [41] (Articles 101–103).

5. Discussion

Within this section, the results presented in Section 4 are discussed.

5.1. Forest Laws as a Basis for Timber Legality

This study analyzed the alignment of the national forest policy frameworks of Montenegro and the Republic of Srpska with EUTR requirements. Both similarities and differences were found between the two countries. While similarities are visible in the policy structure (i.e., forest policy—an action plan for preventing illegal activities—forest law) and the prevalence of public actors in all domains (forest policy-making—forest planning—forest management—forest monitoring), differences are reflected in the diversity of due-diligence documents (stemming from different forest management systems and institutional arrangements, e.g., forest certification), division of legal responsibilities, as well as the available capacities of public actors for ensuring timber legality.

In both Montenegro and the Republic of Srpska, the Forest Law represents a core regulatory policy document relevant to EUTR requirements, as it prohibits felling that is not done in accordance with forest planning documents defining the legal and technical basis for felling. This is the case for many other countries in the Western Balkan region, although some countries (e.g., Croatia) opted to adopt separate laws for EUTR implementation. Table 6 presents an overview of the documentation needed for ensuring compliance with EUTR requirements for Montenegro and the Republic of Srpska (based on presented results) vis a vis the information for Serbia, Croatia, and Slovenia as from [22].

Montenegro and the Republic of Srpska differ from Serbia, Croatia, and Slovenia due to the existence of Action Plans for preventing illegal activities. Such operational policy documents contain specific measures for preventing and fighting illegal logging and other illegal forestry activities, such as amendments to forest laws and redesigning the organization of the forestry sector. Although this might indicate political attention to illegal logging, most of the measures from the Action Plans in both countries are still in the early implementation stages. For example, the fight against corruption in the state and private bodies and the restructuring of the forestry sector was one of the main measures prescribed by Action Plans for preventing illegal logging in both countries, but prevention measures are still not fully implemented. Similarly, the development of a new forestry strategy is just starting in Montenegro, and what changes it will bring to the system are still uncertain.

Triggered by changes in political, social, and economic systems, in the past, forestry reforms in the Western Balkan region [64] brought changes in property rights such as the denationalization of private and church property [65], and agricultural commons [66], the development of national forest action programs and strategies [67,68] and the reorganization of forestry administration [48]. It seems that although many attempts exist to reorganize and improve the state of the forestry sector in Western Balkan countries exist, they remain dominated by command-and-control policy instruments [69] and public actors with constrained capacities for implementation [22,23,70,71].

Table 6. Summary of policy documents addressing EUTR requirements in five Western Balkan countries (Montenegro, the Republic of Srpska, Serbia, Croatia, and Slovenia).

EUTR Obligation	Montenegro	Republic of Srpska	Serbia	Slovenia	Croatia
EUTR implementation	<ul style="list-style-type: none"> • Explicitly not applicable • Implicitly addressed in forest strategies, laws on forests, and action plans on illegal activities 	<ul style="list-style-type: none"> • Explicitly not applicable • Implicitly addressed in forest strategies, laws on forests, and action plans on illegal activities 	<ul style="list-style-type: none"> • Explicitly not applicable • Implicitly addressed in forest strategies, laws on forests 	<ul style="list-style-type: none"> • Forest Act 	<ul style="list-style-type: none"> • Law on the Implementation of European Union Regulations on the Trade of Timber and Timber Products • Law on Forests
Prohibition	<ul style="list-style-type: none"> • Forest Law • Forest management program and the Contractor’s project Plan for forest management in private property • Decision on felling 	<ul style="list-style-type: none"> • Forest Law • Forest management basis, Long-term karst area management program, Investment program of forest plantation management, and Executive project • Decision on felling • Remittance book 	<ul style="list-style-type: none"> • Forest Law • Forest Management Plan • Consignment or Delivery Note 	<ul style="list-style-type: none"> • Forest Act • Forest Management Plan • Decision on felling • Accounting document 	<ul style="list-style-type: none"> • Law on Forests • Law on the Implementation of European Union Regulations on the Trade of Timber and Timber Products • Forest Management Plan • Consignment Note
Due diligence	<ul style="list-style-type: none"> • Certificate of origin 	<ul style="list-style-type: none"> • Receipt from remittance book • Shipping statement • Dispatch note/report • Certification 	<ul style="list-style-type: none"> • Book of Consignment or Delivery Notes • Certification 	<ul style="list-style-type: none"> • Record sheet • Certification 	<ul style="list-style-type: none"> • Notice of Public Tender • Specification of Timber Assortments • EUTR Consignment Note • Certification
Traceability	<ul style="list-style-type: none"> • Reception book • Register of shipping documents • National forestry register 	<ul style="list-style-type: none"> • Receipt from remittance book • Shipping statement • Dispatch note/report 	<ul style="list-style-type: none"> • Book of Consignment or Delivery Notes 	<ul style="list-style-type: none"> • Record sheet 	<ul style="list-style-type: none"> • Instructions for Operators and Traders • National Register • Remittance Book • Consignment Book

Table 6. Cont.

EUTR Obligation	Montenegro	Republic of Srpska	Serbia	Slovenia	Croatia
Enforcement	<ul style="list-style-type: none"> • Forest guards • Forestry and Hunting Inspection • Ministry responsible for forestry • Customs administration 	<ul style="list-style-type: none"> • Forest guards • Public enterprise • Ministry responsible for forestry, directorate for forests • Forestry and Hunting Inspection • Market Inspection • Customs administration 	<ul style="list-style-type: none"> • Forestry and Hunting Inspection • Ministry responsible for forestry • Customs administration 	<ul style="list-style-type: none"> • Ministry of Agriculture, forestry and Food–Forestry Inspectorate (CA) • Financial Administration of the Republic of Slovenia 	<ul style="list-style-type: none"> • Ministry of Agriculture • Customs administration

Source: Updated from [22] based on own elaborations.

Ensuring timber legality remains a worldwide challenge [12,72–74], and implementation of the EUTR requirements has been demanding for many EU member states, including Western Balkan ones such as Slovenia and Croatia, with delays and gaps reported by different studies [11,75]. In addition, implementation of the EUTR requirements implies compliance costs for the EU forest-based industry [76]. To prove the legality of timber and timber products, operators need to collect several documents, e.g., documentation on logging rights, payments for logging, legal rights of third parties regarding the use and possession of land affected by logging, trade and customs documents, etc., that prove that the timber has been legally sourced and traded. As evident from Table 6, in each country, information gathering for the aims of implementing due diligence includes several documents and permits that contain specific information about the timber and its origins and must accompany timber from the logging site to the final destination. In addition to collecting information, documents, and evidence, the EUTR also requires a risk assessment to be performed to identify the likelihood of importing illegally sourced materials. In the case of Montenegro and the Republic of Srpska, Action Plans for preventing illegal forestry activities in geographically defined critical forest areas exposed to illegal activities could facilitate risk assessment and due diligence procedures.

5.2. Forest Certification as a Due-Diligence Tool

The two main international forest certification schemes (i.e., the Programme for the Endorsement of Forest Certification, PEFC, and the Forest Stewardship Council, FSC) substantially aligned their standards with EUTR requirements [77]. Thus, holding an FSC or PEFC certificate considerably lowers the risks of illegality and ultimately contains the costs of implementing EUTR and, in particular, developing, running, and maintaining a Due Diligence System [78]. In the Western Balkan region, forest certification “is, to a certain extent, perceived as a guarantee for the legality of wood operations and origin” [18]; even though forest certification does not ensure a green lane against EUTR requirements and its scope goes beyond just meeting legality requirements. Montenegro and the Republic of Srpska show different figures in terms of certified forest areas. While in the Republic of Srpska, all state forests, for a total area of 1,011,218 ha, are certified according to FSC standards, there are no certified forest areas in Montenegro. With regard to chain of custody standards, Bosnia and Herzegovina holds 331, and Montenegro only one [79]. The other three Western Balkan countries (Serbia, Croatia, and Slovenia) have more than 50% of forests certified and aim to promote forest certification and increase certified forest areas [18,20,80].

Additionally, in the forest strategy of Montenegro, it is reported that since the sector is mainly oriented to the domestic timber market, certification is considered a useful tool but not critically needed for the timber industry. In Montenegro, there are ongoing changes and forestry sector reforms, and a state forest management organization is expected to be formed by the end of 2023. Based on data provided by the Ministry of Agriculture, Forestry and Water Management, Directorate for Timber Industry, in 2021, 85% of timber and timber products exported are related to Serbia, Kosovo, and Albania. Only 10% of the total export value finds a way to EU buyers. Private companies currently selling on the EU market are proving legality thanks to verification bodies and Ministry support in providing necessary documents.

5.3. Limited Capacities for Implementation

The effective implementation of EUTR requirements implies strict cooperation among all relevant actors, both public and private, from within and outside the forestry sector [10,81]. For example, the Forest Law in Montenegro and the Republic of Srpska (as well as in Serbia, Croatia, and Slovenia) prescribes divided responsibility between forest owners, forest guards, inspectorate, and police. In terms of EUTR enforcement, the responsibilities of the competent authority would probably be under the ministry responsible for forestry, the inspectorate responsible for forestry, and customs. This adds to the complexity of

coordination among multiple bodies and imposes further challenges to the already limited capacities of public authorities [82], thus potentially creating bottlenecks and inefficiencies while simultaneously strengthening their dominant positions in the sector [71].

Such findings are complementary to those reported by [22] for Serbia and, to a lesser extent, for Slovenia and Croatia, as mentioned in the previous literature [9,11,83,84]. Both countries, as well as Serbia, Croatia, and Slovenia, have a limited and relatively small number of forest inspectors and do not have separate budgets for timber legality verification, which are impediments to an effective EUTR implementation across the EU [11]. To successfully combat illegal timber, more robust law enforcement would be needed in terms of an increased number of checks, more efficient and effective monitoring, and stricter fines [14]. To achieve this, all analyzed countries will need to increase their capacities in terms of human resources, technology, and financing.

5.4. Availability and Transparency of Information

Transparency, availability, and accessibility of information on timber legality are still low in both Montenegro and the Republic of Srpska. Forest management plans, felling permits, consignment, and delivery notes should be kept as archive material, but not all are freely accessible in the two countries. There is no easily and freely available information about progress in implementing action plans for preventing illegal activities. As in other Western Balkan countries (e.g., Serbia and Croatia), the websites of ministries responsible for forestry list documents relevant to forestry (e.g., strategies, laws, etc.), yet those lists are not regularly updated, nor are all listed documents available online. Additionally, our results point to the discrepancy concerning the EUTR traceability requirement, as for some documents, the record-keeping time in Montenegro is three years, while EUTR requires a retention time of five years. Thus, further improvements are possible and necessary to ensure complete alignment with EU requirements and increase transparency and accessibility of information.

In Montenegro and the Republic of Srpska (as well as in Serbia, Croatia, and Slovenia), the Forest Law and other policy documents prescribe the formulation of the digitalized and centralized national information system for forests and timber. Those systems should serve multiple purposes (e.g., forest management planning, forest monitoring, timber trade, etc.) and are planned to be developed in Montenegro and the Republic of Srpska while they are being developed in Serbia. On 19 April 2023, the European Parliament formally approved a new European Union Deforestation Regulation on commodities and products associated with deforestation and forest degradation. With a focus on “deforestation-free” commodities, this new regulation will replace the EUTR and pose severe challenges to many EU member states. It is reasonable to assume that it will be even more challenging for countries with less developed/advanced systems to enforce legality requirements. Western Balkan countries will be no exception, and the preparedness of forest sector actors for the current (e.g., EUTR) or upcoming EU policies is unknown. Policy and decision-makers should follow up and take into consideration the developments and requirements of upcoming EU regulations dealing with zero-deforestation targets (e.g., the requirement of geo-referencing) and strive to create national information systems in tune with the latest technological developments (e.g., remote sensing) and inter-operable with those of the EU.

Currently, in the Western Balkan countries, much greater awareness of policy makers, as well as public and private organizations, is needed on the importance of EUTR implementation and appropriate measures for preventing illegal forest activities, followed by strong financial support for the successful building of capacity.

5.5. Research Limitations

Although policy analysis was useful for identifying the alignment of policy frameworks with EUTR requirements, the limitations of this study might be seen in the exploratory and descriptive character of the analyzed policies and measures. Regardless of its descriptive character, this approach was suitable for identifying relevant policies as

well as recognizing EUTR requirements. However, relevant, current, and future implications related to trade relations between the analyzed countries and the EU are beyond the scope of this paper, as our first aim was to analyze national legislation regarding future EUTR implementation in the targeted countries. Another limitation is related to the scope of the study, which is limited to the national level. As the issue of timber legality is an issue of practice, future research should also focus on regional or local levels and the implementation of adopted policies.

6. Conclusions

This study analyzed forest policy documents for Montenegro and the Republic of Srpska, finding that the current framework is largely aligned with the EUTR requirements; however, some minor discrepancies were noted. Building on previous studies, in our discussion, we broadened the scope to Serbia, Croatia, and Slovenia, contributing to a wider picture of EUTR implementation within the Western Balkan region. We found that the forestry sectors in all five countries are dynamic ones, currently undergoing changes vis a vis multiple challenges, including aligning with EU policies and regulations. We also pointed out that there is room for improvement in terms of capacities (e.g., human, technological, and infrastructural), legal responsibilities, and information access and availability.

In several Western Balkan countries (including the Republic of Srpska and Montenegro), changes in the forestry sectors are ongoing. New policies will likely not be enough to ensure an appropriate promotion of legality. It seems that to ensure better governance of the forestry sector in the Western Balkans, in addition to an effective mix of policy tools, a true political will, multi-level and cross-sectoral cooperation, as well as higher awareness of all relevant actors are needed. However, how much of that will be changed remains to be seen after another “Western Balkan transition” chapter. Hopefully, undergoing forestry reforms (in Montenegro and the Republic of Srpska) will bring forward policies accommodating not just the EUTR but even stricter requirements of the forthcoming “zero deforestation” regulation.

Since forest certification goes beyond mere legality and there is room for it to be further developed in the region, it would deserve better attention from both policies and stakeholders in general. While supporting (though not being determinant or sufficient for) meeting EUTR requirements, it would help to ensure sustainable forest management. At the same time, it could add value to marketed forest products, especially when exported to sensitive markets, as well as create opportunities (in the case of FSC) with regard to the valuation of forest-based ecosystem services. Certifying forest areas is not enough for this, as it only represents a preliminary, though important, step that should be complemented by supporting certification along the supply chain (chain of custody certification) and increasing market awareness, including within domestic markets. Recent activities promoting FSC certification in the Balkans and possible future plans for stronger and better-coordinated initiatives in the area might help achieve these goals.

To overcome forthcoming challenges and fulfill the EU accession requirements, the Western Balkan countries will need to strengthen cooperation, build capacities, increase transparency, and improve legality verification. Future research should follow up on the dynamic situation in the Western Balkans to provide scientific guidance and know-how for policymakers to build capacities and identify feasible solutions for addressing illegal logging. Research focusing on actors’ knowledge, perceptions, and information exchange would facilitate the research-policy interface.

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References

1. Polo Villanueva, F.D.; Tegegne, Y.T.; Winkel, G.; Omar, P.; Ramcilovic-Suominen, S.; Mcdermott, C.L.; Zeitlin, J.; Sotirov, M.; Cashore, B.; Andrew, D.; et al. Effects of EU illegal logging policy on timber-supplying countries: A systematic review. *J. Environ. Manag.* **2023**, *327*, 116874. [CrossRef]
2. Bösch, M. Institutional quality, economic development and illegal logging: A quantitative cross-national analysis. *Eur. J. For. Res.* **2021**, *140*, 1049–1064. [CrossRef]
3. Kleinschmit, D.; Mansourian, S.; Wildburger, C.; Purrett, A. (Eds.) *Illegal Logging and Related Timber Trade—Dimensions, Drivers, Impacts and Responses. A Global Scientific Rapid Response Assessment Report*; IUFRO World: Vienna, Austria, 2016; Volume 35, ISBN 978-3-902762-70-2.
4. FAO: Deforestation and Forest Degradation Persist. Available online: <https://www.fao.org/3/cb9360en/online/src/html/deforestation-land-degradation.html> (accessed on 18 March 2023).
5. FAO. *Global Forest Resources Assessment 2020: Main report*; FAO: Rome, Italy, 2020. [CrossRef]
6. Austin, K.G.; González-Roglich, M.; Schaffer-Smith, D.; Schwantes, A.M.; Swenson, J.J. Trends in size of tropical deforestation events signal increasing dominance of industrial-scale drivers. *Environ. Res. Lett.* **2017**, *12*, 054009. [CrossRef]
7. Houghton, K.; Naughton, H. Trade and sustainability: The impact of the International Tropical Timber Agreements on exports. *Int. Environ. Agreem. Politics Law Econ.* **2017**, *17*, 755–778. [CrossRef]
8. Reboredo, F. Socio-economic, environmental, and governance impacts of illegal logging. *Environ. Syst. Decis.* **2013**, *33*, 295–304. [CrossRef]
9. European Commission (2020) 629 Final. *Report from the Commission to the European Parliament and the Council (the EU Timber Regulation) Biennial Report for the Period March 2017–February 2019*; European Commission: Brussels, Belgium, 2020.
10. Sotirov, M.; Stelter, M.; Winkel, G. The emergence of the European Union Timber Regulation: How Baptists, Bootleggers, devil shifting and moral legitimacy drive change in the environmental governance of global timber trade. *For. Policy Econ.* **2017**, *81*, 69–81. [CrossRef]
11. European Commission. European Commission Executive Summary of the Fitness Check on Regulation (EU) No 995/2010 of the European Parliament and of the Council of 20 October 2010 (the EU Timber Regulation) and on Regulation (EC) No 2173/2005 of 20 December 2005 (FL). *Comm. Staff Work. Doc.* **2021**. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52021SC0329> (accessed on 14 August 2022).
12. Masiero, M.; Pettenella, D.; Cerutti, P.O. Legality constraints: The emergence of a dual market for tropical timber products? *Forests* **2015**, *6*, 3452–3482. [CrossRef]
13. Rougieux, P.; Jonsson, R. Impacts of the FLEGT Action Plan and the EU Timber Regulation on EU trade in timber product. *Sustainability* **2021**, *13*, 6030. [CrossRef]
14. Giurca, A.; Jonsson, R.; Rinaldi, F.; Priyadi, H. Ambiguity in timber trade regarding efforts to combat illegal logging: Potential impacts on trade between south-east Asia and Europe. *Forests* **2013**, *4*, 730–750. [CrossRef]
15. Moreira-Dantas, I.R.; Söder, M. Global deforestation revisited: The role of weak institutions. *Land Use Policy* **2022**, *122*, 106383. [CrossRef]
16. Gebert, A. Remote Sensing Methods for Detecting Deforestation and Illegal Logging in Bosnia and Herzegovina. Bachelor’s Thesis, Lund University, Lund, Sweden, 2019.
17. Segato, L. Tackling corruption in the framework of the EUTR; the TREES project. In Proceedings of the 27th Illegal Logging Update and Stakeholder Consultation Meeting, London, UK, 19–20 June 2017; Chatam House: London, UK, 2017.
18. Malovrh, Š.P.; Bećirović, D.; Marić, B.; Nedeljković, J.; Posavec, S.; Petrović, N.; Avdibegović, M. Contribution of Forest Stewardship Council Certification to sustainable forest management of state forests in selected Southeast European Countries. *Forests* **2019**, *10*, 648. [CrossRef]
19. Vasiljević, A.; Glavonjic, B. Certification of forests and wood products in Serbia in the context of new European Union legislations—current situation, problems and challenges. *Glas. Šumarskog Fak.* **2011**, *103*, 7–28. [CrossRef]
20. Paluš, H.; Parobek, J.; Vlosky, R.P.; Motik, D.; Oblak, L.; Jošt, M.; Glavonjić, B.; Dudík, R.; Wanat, L. The status of chain-of-custody certification in the countries of Central and South Europe. *Eur. J. Wood Wood Prod.* **2018**, *76*, 699–710. [CrossRef]

21. Glavonjić, B.; Vlosky, R.P.; Borlea, G.F.; Petrović, S.; Sretenović, P. The wood products industry in the western balkan region. *For. Prod. J.* **2009**, *59*, 98–111. [CrossRef]
22. Radosavljević, M.; Masiero, M.; Rogelja, T.; Glavonjić, B. Adaptation to EUTR requirements: Insights from Slovenia, Croatia and Serbia. *Forests* **2021**, *12*, 1665. [CrossRef]
23. Avdibegović, M.; Vuletić, D.; Makedonka, S.; Peri, L.; Nonić, D.; Delić, S.; Keča, L.; Nenad, P.; Radosavljević, A.; Marić, B.; et al. *The Adaptation of National Forest Policy Systems in South-East European Countries (Albania, Bosnia-Herzegovina, Croatia, Macedonia and Serbia) to New Modes of International Forest Governance*; Conference Paper, IUFRO – All Division 9 Conference “Assessing Forest Governance in a Context of Change”, Sarajevo, Bosnia and Herzegovina; 2012. Available online: https://www.researchgate.net/profile/Leonidha-Peri/publication/272164288_The_adaptation_of_national_forest_policy_systems_in_South-East_European_countries_Albania_Bosnia-Herzegovina_Croatia_Macedonia_and_Serbia_to_new_modes_of_international_forest_governance/links/573f7c6408ae9f741b321ff0/The-adaptation-of-national-forest-policy-systems-in-South-East-European-countries-Albania-Bosnia-Herzegovina-Croatia-Macedonia-and-Serbia-to-new-modes-of-international-forest-governance.pdf (accessed on 4 November 2022).
24. Glavonjić, B. Proving Legality of Wood and Wood Products-Current Development in Serbia 2015. Balkan Workshop on Forest Products Markets and Forest Sector Workforce, Podgorica, Montenegro, 8–10 December 2015. Available online: <https://unece.org/fileadmin/DAM/timber/workshops/2015/5-Glavonic-proving-legality.pdf> (accessed on 4 November 2022).
25. Stanisic, M.; Jovic, D.; Nonic, D. Legal similarities and differences of environmental protection and forestry in West Balkan countries. In *Legal Aspects of European Forest Sustainable Development. Proceedings of the 7th International Symposium Organized Jointly by the IUFRO Research Group 6.13.00 and the Faculty of Forestry, University of Belgrade/Serbia; Zlatibor Mountain, Serbia*; Schmithüsen, F., Herbst, P., Nonić, D., Jović, D., Stanišić, M., Eds.; Swiss Federal Institute of Technology, ETH: Zürich, Switzerland, 2006; Volume 35, pp. 49–56.
26. Petrova, S. Contesting forest neoliberalization: Recombinant geographies of “illegal” logging in the Balkans. *Geoforum* **2014**, *55*, 13–21. [CrossRef]
27. Markus-Johansson, B.; Mesquita, A.; Nemeth, M.; Dimovski, C.; Monnier, P. *Kiss-Parciu, Illegal Logging in South Eastern Europe Regional Report, REC Working Paper*; The Regional Environmental Center for Central and Eastern Europe (REC): Szentendre, Hungary, 2010.
28. FEA, GreenHome, CNVP, Regional Action for Combating Forest Crime and Corruption, The Survey on Corruption and Illegal Activities in Forestry—The Report of the Activity 3.2. 2020. Available online: https://watchtheforests.org/documents_files/The_Survey_on_Corruption_and_Illegal_activities_in_forestry.pdf (accessed on 14 August 2022).
29. Transparency International 2022 Corruption Perceptions Index. Available online: <https://www.transparency.org/en/cpi/2022> (accessed on 11 February 2023).
30. Barredo, J.I.; Brailescu, C.; Teller, A.; Sabatini, F.M.; Mauri, A.; Janouskova, K. *Mapping and Assessment of Primary and Old-Growth Forests in Europe*; EUR 30661 EN; Publications Office of the European Union: Luxembourg, 2021; ISBN 978-92-76-34230-4. [CrossRef]
31. Maria Sabatini, F.; Burrascano, S.; Keeton, W.S.; Levers, C.; Lindner, M.; Pötzschner, F.; Johannes Verkerk, P.; Bauhus, J.; Buchwald, E.; Chaskovsky, O.; et al. Where are Europe’s last primary forests? *Divers. Distrib.* **2018**, *24*, 1426–1439. [CrossRef]
32. Polunin, O. *Flower of Greece and the Balkans—A Field Guide*; Oxford University Press: Oxford, UK, 1987; ISBN 9780192819987.
33. Kranjc, A. History of deforestation and reforestation in the dinaric karst. *Geogr. Res.* **2009**, *47*, 15–23. [CrossRef]
34. Boncina, A. History, current status and future prospects of uneven-aged forest management in the Dinaric region: An overview. *Forestry* **2011**, *84*, 467–478. [CrossRef]
35. Stevanov, M.; Krott, M.; Curman, M.; Krajter Ostoić, S.; Stojanovski, V. The (New) role of public forest administration in Western Balkans: Examples from Serbia, Croatia, FYR Macedonia, and Republika Srpska. *Can. J. For. Res.* **2018**, *48*, 898–912. [CrossRef]
36. Avdibegović, M.; Nonić Dragan, D.; Posavec, S.; Petrović, N.; Marić, B.; Milijić, V.; Krajter, S.; Ioras, F.; Abrudan, I.V. Policy options for private forest owners in Western Balkans: A qualitative study. *Not. Bot. Horti Agrobot. Cluj-Napoca* **2010**, *38*, 257–261.
37. European Commission Stabilisation and Association Process. Available online: https://neighbourhood-enlargement.ec.europa.eu/enlargement-policy/glossary/stabilisation-and-association-process_en (accessed on 14 August 2022).
38. Kittova, Z.; Steinhäuser, D. The international economic position of Western Balkan countries in light of their European integration ambitions. *J. Compet.* **2018**, *10*, 51–68. [CrossRef]
39. European Commission. Montenegro 2022 Report Accompanying the document Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions 2022 Communication on EU Enlargement policy. *Comm. Staff Work. Doc.* **2022**, 1–135. Available online: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52022SC0335> (accessed on 14 August 2022).
40. European Commission. Key findings of the 2022 Report on Montenegro. *Press Corner Ctry Insights* **2022**. Available online: https://ec.europa.eu/commission/presscorner/detail/en/COUNTRY_22_6103 (accessed on 14 August 2022).
41. Yin, R.K. *Case Study Research Design and Methods*, 4th ed.; Sage Publications Inc.: Southend Oaks, CA, USA, 2009; ISBN 978-1-4129-6099-1. [CrossRef]
42. Malovrh, Š.P.; Kumer, P.; Glavonjić, P.; Nonić, D.; Nedeljković, J.; Kisin, B.; Avdibegović, M. Different organizational models of private forest owners as a possibility to increase wood mobilization in Slovenia and Serbia. *Croat. J. For. Eng. J. Theory Appl. For. Eng.* **2017**, *38*, 127–140.

43. Bjegović, J.K.; Diku, A.; Vukovic, A.; Dorfer, A.; Vasic, J.; Kadiouglu, B.; Stavrevska-Panajotova, A. *Study on Illegal Logging and Timber Trade Flows—Legal and Administrative Aspects, Implementation and Enforcement*; Publications Office of the European Union: Luxembourg, 2021.
44. Mayring, P. Qualitative Content Analysis. *Forum Qualitative Soc. Res.* **2000**, *1*, 10.
45. FAO. *GFR 2020 Report, Montenegro*; FAO: Rome, Italy, 2020.
46. Kankaras, R. Montenegro Country Profile. Available online: <http://www.china-ceecforestry.org/country/montenegro/> (accessed on 14 August 2022).
47. Official Gazette of the Republic of Montenegro, No. 074/10, 040/11, 047/15, *Forest Law*, **2015**, 1–25. Available online: <https://wapi.gov.me/download-preview/79727e36-026a-4bd5-9473-568a8e2334a2?version=1.0> (accessed on 14 August 2022).
48. Čomic, D.; Skrbic, N.; Becirovic, D.; Milovanovic, M. Pregled Organizacija i Institucija Šumarstva u Republici Srpskoj, Federaciji BiH, Srbiji, Hrvatskoj i Crnoj Gori. *Glas. Sumar. Fak. Univ. U Banjoj Luci* **2013**, *18*, 57–90.
49. Directorate for Forests, Montenegro. Business Year Report 2021, 2021, 27p. Available online: http://www.upravazasume.me/razni_fajlovi/1660553732.pdf (accessed on 14 August 2022).
50. Ministry of Agriculture, Forestry and Water Management, Montenegro. Proposal of the Rulebook on Internal Organization, 2022. Available online: <https://www.gov.me/dokumenta/aaa2a303-e222-455b-ba3d-3bf993aa218c> (accessed on 4 November 2022).
51. Administration for Inspection Affairs, Montenegro. Rulebook on Internal Organization, 2021. Available online: <https://www.gov.me/dokumenta/ed5676df-e660-4574-8187-bdd09d15b69f> (accessed on 4 November 2022).
52. Stanicek, B. Bosnia and Herzegovina: Difficult path towards EU membership. *A Glance* **2021**. Available online: <https://cor.europa.eu/en/events/Documents/CIVEX/6th-enlargement-day/Bosnia%20and%20Herzegovina%20-%20Difficult%20path%20towards%20EU%20membership.pdf> (accessed on 14 August 2022).
53. UN-WCMC, Bosnia and Herzegovina—Country Overview to Aid Implementation of the EUTR, 2020. Available online: https://www.miteco.gob.es/es/biodiversidad/temas/internacional-especies-madera/countryoverviewbosniaandherzegovina19042020_tcm30-522513.pdf (accessed on 14 August 2022).
54. FAO. *GFR 2020 Desk Study Bosnia and Herzegovina*; FAO: Rome, Italy, 2020.
55. WWF. *Illegal Wood for the European Market. An Analysis of the EU Import and Export of Illegal Wood and Related Products*; WWF: Frankfurt am Main, Germany, 2008.
56. Ministry of Agriculture and Rural Development, Montenegro. Program of Reorganization of Concession Use of Forests, 2020. Available online: <https://www.gov.me/dokumenta/df17d16f-5565-4439-b291-2884605d144c> (accessed on 4 November 2022).
57. Ministry of Ecology, Spatial Planning and Urbanism. Action Plan for Meeting the Final Criteria in Chapter 27—Environment and Climate Change 2021, 152. Available online: <https://www.gov.me/dokumenta/abaef2f4-d824-4d42-a05d-e6a8ad92a09d> (accessed on 9 November 2022).
58. Government of Montenegro. Action Plan for Combating Illegal Activities in Forestry 2022–2023, 2021. Available online: <https://wapi.gov.me/download/d66ad413-24b5-43d4-8a65-7529872bd7f2?version=1.0> (accessed on 15 November 2022).
59. Government of Montenegro. Revised Forest Strategy, 2018–2023, 2018, 33. Available online: <https://www.gov.me/dokumenta/47673bc4-b66d-45f2-975e-db4743bf81a6> (accessed on 4 November 2022).
60. Government of the Republic of Srpska, Ministry of Agriculture, Forestry and Water Management. Forestry Development Strategy 2011–2021. Available online: <https://www.vladars.net/eng/vlada/ministries/MAFW/Pages/default.aspx> (accessed on 14 August 2022).
61. Official Gazette of the Republic of Srpska, No. 75/08, 60/13, 70/20, Law Forest, 2020. Available online: https://www.vladars.net/sr-SP-Cyrl/Vlada/Ministarstva/mps/Documents/Prijedlog%20zakona%20o%20izmjenama%20i%20dopunama%20Zakona%20o%20sumama_240068094.pdf (accessed on 5 December 2022).
62. Government of the Republic of Srpska, Action Plan for the Suppression of Illegal Felling, Theft and Illegal Traffic Of Timber Assortments. 2015.
63. Official Gazette of the Republic of Srpska, Rulebook on the Tree Markation, 2009. Available online: https://rzsm.org/images/stories/RZSM/Propisi/MPSV/SumarstvoLovstvo/MPSV_Sum_Vazeci/4-13-09%20pravilnik%20o%20vrsenju%20doznake%20stabala%20za%20sjecu.pdf (accessed on 5 December 2022).
64. Nonić, D.; Ranković, N.; Nedeljković, J.; Glavonjić, P.; Marinković, M. Transition process in forestry in Serbia and selected CSEE countries: Policy and property rights reforms. In *Legal Aspects of European Forest Sustainable Development*; Deltuvus, R., Herbst, P., Činga, G., Eds.; Aleksandras Stulginskis University Romualdas: Kaunas, Lithuania, 2011; pp. 177–186.
65. Nonić, D.; Petrović, N.; Medarević, M.; Glavonjić, P.; Nedeljković, J.; Stevanov, M.; Orlović, S.; Rakonjac, L.; Djordjević, I.; Poduška, Z.; et al. *Forest Land Ownership Change in Serbia. COST Action FP1201 FACESMAP Country Report*; Serbia. COST Action FP1201 FACESMAP Country Report; European Forest Institute Central—East and South-East European Regional Office: Vienna, Austria, 2015.
66. Premrl, T.; Udovč, A.; Bogataj, N.; Krč, J. From restitution to revival: A case of commons re-establishment and restitution in Slovenia. *For. Policy Econ.* **2015**, *59*, 19–26. [CrossRef]
67. Nonić, D.; Milijić, V. *Analysis of Current Situation of Private Forests in Serbia and Its Role in the Process of Defining the Forestry Development Strategy (SDS) and the National Forest Programme (NFP)*; PROFOR i CEPF: Belgrade, Serbian, 2008.

68. Stojanovska, M.; Miovska, M.; Jovanovska, J.; Stojanovski, V. The process of forest management plans preparation in the Republic of Macedonia: Does it comprise governance principles of participation, transparency and accountability? *For. Policy Econ.* **2014**, *49*, 51–56. [CrossRef]
69. Sergent, A.; Arts, B.; Edwards, P. Governance arrangements in the European forest sector: Shifts towards ‘new governance’ or maintenance of state authority? *Land Use Policy* **2018**, *79*, 968–976. [CrossRef]
70. Liubachyna, A.; Bubbico, A.; Secco, L.; Pettenella, D. Management goals and performance: Clustering state forest management organizations in Europe with multivariate statistics. *Forests* **2017**, *8*, 504. [CrossRef]
71. Rogelja, T.; Shannon, M.A. Structural power in Serbian anti-corruption forest policy network. *For. Policy Econ.* **2017**, *82*, 52–60. [CrossRef]
72. Kleinschmit, D.; Ferraz Ziegert, R.; Walther, L. Framing illegal logging and its governance responses in Brazil—A structured review of diagnosis and prognosis. *Front. For. Glob. Chang.* **2021**, *4*, 59. [CrossRef]
73. Acheampong, E.; Maryudi, A. Avoiding legality: Timber producers’ strategies and motivations under FLEGT in Ghana and Indonesia. *For. Policy Econ.* **2020**, *111*, 102047. [CrossRef]
74. Pendrill, F.; Persson, U.M.; Godar, J.; Kastner, T.; Moran, D.; Schmidt, S.; Wood, R. Agricultural and forestry trade drives large share of tropical deforestation emissions. *Glob. Environ. Chang.* **2019**, *56*, 1–10. [CrossRef]
75. Ministry of Agriculture. *National Biennial Report on the Implementation and Enforcement of EUTR for Croatia for the Period 2017–2019*; Ministry of Agriculture: Zagreb, Croatia, 2019.
76. Köthke, M. Implementation of the European Timber Regulation by German importing operators: An empirical investigation. *For. Policy Econ.* **2020**, *111*, 102028. [CrossRef]
77. Holopainen, J.; Toppinen, A.; Perttula, S. Impact of European Union timber regulation on forest certification strategies in the Finnish wood industry value chain. *Forests* **2015**, *6*, 2879–2896. [CrossRef]
78. Brusselaers, J.; Buysse, J. Legality requirements for wood import in the EU: Who wins, who loses? *For. Policy Econ.* **2021**, *123*, 102338. [CrossRef]
79. Forest Stewardship Council Certification in Numbers. Available online: <https://adria-balkan.fsc.org/sr/sta-je-fsc/certifikacija-u-brojevima> (accessed on 22 March 2023).
80. Terziyska, P.; Rantala, A.; Posavec, S.; Malovrh, E.K.; Sarniak, S.; Betlejewska, S.; Bu, G. *Management Aspects in Forestry and Forest Based Industries*; Jelacic, D., Ed.; WoodEMA i.a.: Zagreb, Croatia, 2020; ISBN 9789535782278.
81. Giurca, A.; Jonsson, R. The opinions of some stakeholders on the European Union Timber Regulation (EUTR): An analysis of secondary sources. *IForest* **2015**, *8*, 681–686. [CrossRef]
82. Lodge, M.; Wegrich, K. (Eds.) *The Problem-Solving Capacity of the Modern State: Governance Challenges and Administrative Capacities*; Oxford University Press: Oxford, UK, 2014.
83. World Wide Fund For Nature, Brussels, Belgium, Enforcement Review of the EU Timber Regulation (EUTR) 2019. Available online: https://wwf.eu.awsassets.panda.org/downloads/wwf_eutr_implementation_eu_synthesis_report_2019.pdf (accessed on 14 August 2022).
84. Clientearth. *Internal Illegal Logging-Evaluation of EU Rules (Fitness Check)—EUTR and FLEGT Regulation Our Call for a More Effective Regulatory Approach to Tackle Illegal Logging*. 2020. Available online: <https://www.clientearth.org/media/iljoaqaf/position-paper-eutr-flegt-consultation.pdf> (accessed on 14 August 2022).

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