

A low-angle photograph of a dense forest. The trees are tall and slender, with thick, moss-covered trunks. The canopy is a vibrant, bright green, filling most of the upper half of the frame. The ground is covered in fallen leaves and ferns, with some large rocks visible. The overall atmosphere is lush and natural.

**Investigation of
Romanian forests in
Natura 2000 sites**

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Cover photo: Susanne Schmidt

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Glossary of acronyms

AA - Appropriate Assessment

APV - logging permit

EGO - Emergency Governmental Ordinance

EIA - Environmental Impact Assessment

EU - European Union

FMP - Forest Management Plan

GPS - Global Positioning System

SCI - Sites of Community Importance

SAC - Special Areas of Conservation

Summary

In early 2023, investigators travelled to Romanian forested areas with active logging in five different Natura 2000 sites, four of which are subject to an infringement procedure by the European Commission: Maramures mountains, Domogled, Frumoasa, and Făgăraş mountains. Bârnova Natura 2000 was also visited to gather new information on the extent of logging in this area. In particular, the European Commission has identified that these areas have logging permits but lack management plans and impact assessments.

The report looked at 47 logging permits in 2022 and 2023 in 16 locations within the aforementioned Natura 2000 sites, seven of which were state-owned forests and nine locations were private forests. All locations had ongoing activity, such as active logging permits or wood transports. The average age of the forests visited was 125. The 47 logging permits account for 0.01% of all the logging permits in the Romanian public database of logging permits. In just 0.01% of logging permits, around 65355.89 m³ of trees have been authorised for removal in 2022 and 2023, equivalent to removing 420 football fields of forested area, without accounting for the illegal logging that is also taking place.

Overall, there is a lack of transparency regarding the ongoing forest activities that should be publicly available. In particular, all the Forest Management Plans (FMPs) that were available were heavily censored; in most cases, as much as 75% - 80% of the information was removed, including vital information such as detailed parcel description, proposed logging works, previous interventions, and detailed forest maps.

Also, the FMPs occurring on private land (9 out of 16) were difficult to find publicly as this information was missing from the government's forestry database (Sumal 2.0). FMPs in private land might be added online on the Ministry of Environment's website; however, it is difficult to identify which private land the FMP belongs to because important details are missing, including owners' names and forest maps.

Environmental Impact Assessments (EIA) and Appropriate Assessments (AAs) are generally not completed for most FMPs, even though three years have passed since the start of the European Commission infringement. Out of 16 sites analysed, none had an AA, and only one had an EIA, on Valsan Valley, in Făgăraş. This specific EIA lacked in quality; for example, it completely omitted an endemic and critically endangered fish species, *Romanichthys valsanicola*, for which that specific location was protected for. As a result of ongoing active logging that has disturbed the river ecosystem, this species is now potentially extinct.

Introduction

The Romanian government has been under scrutiny by the European Commission for not managing illegal logging in Natura 2000 sites ever since Agent Green, ClientEarth and EuroNatur submitted a complaint CHAP(2019)02656.

Under the European Union (EU), the impact of logging operations on protected species and habitats needs to be evaluated. Logging operations in Natura 2000 sites need to undergo, in particular, an Appropriate Assessment (AA). This means that in Romania, Forest Management Plans (FMPs) should undergo an AA. However, legislation in Romania lacked the necessity to undertake these assessments.

On December 16 2022, Romania passed an Emergency Governmental Ordinance 177/2022 (“EGO 177/2022”). Unfortunately, this new regulation does not interfere with the logging permits that have already been granted. The new EGO 177/2022 sets, latest, September 2023 (i.e. 9 months)¹ as the deadline to start the process of defining appropriate assessments (“AA”) of FMPs. It is expected that once AAs are finalised, FMPs will need to be re-drafted and adapted to reflect the recommendations set out in the AAs. Consequently, it is also expected that logging permits will be retracted where needed. However, logging continues regardless of whether these legal requirements have been met.

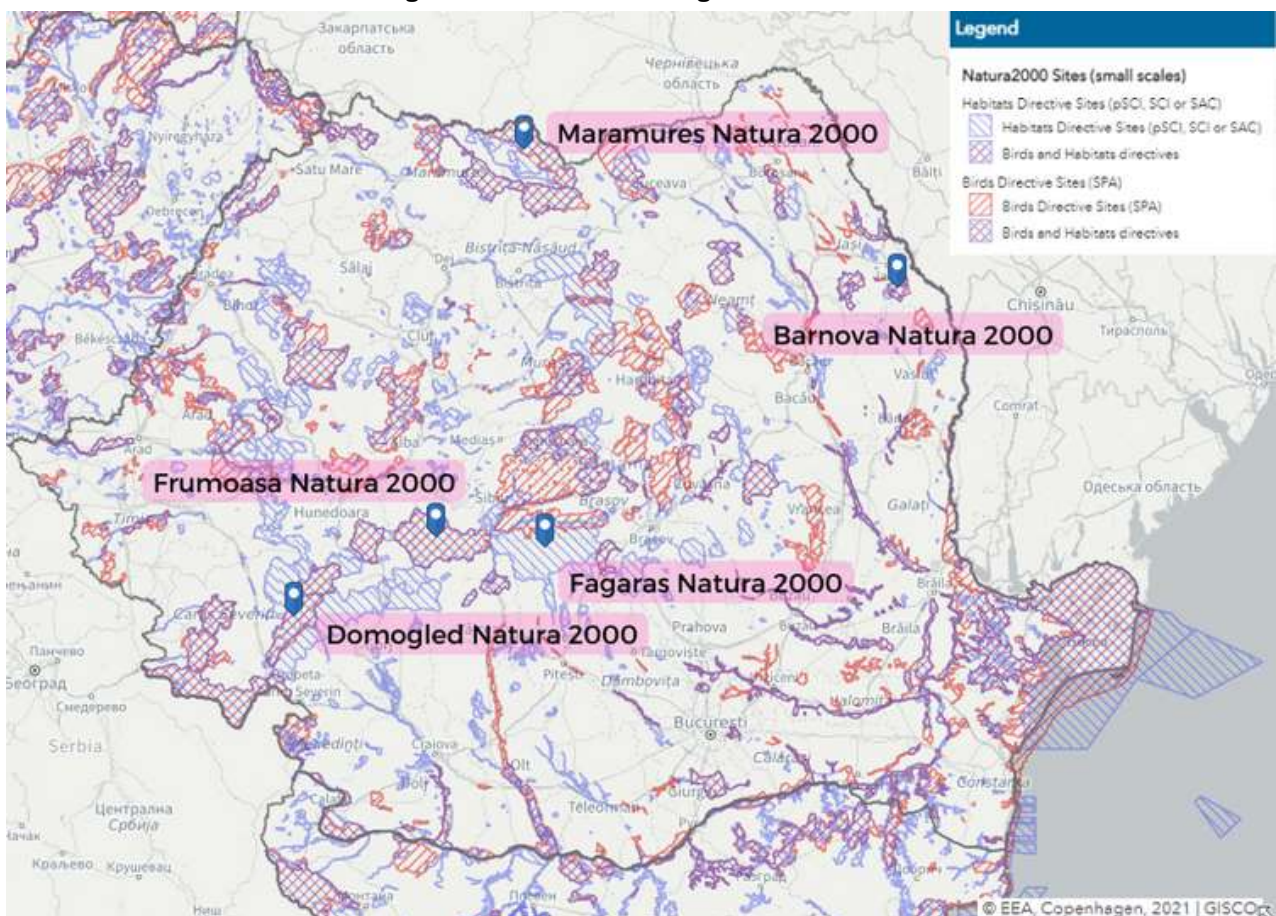
In February 2022, EuroNatur, Client Earth, and Agent Green released the first analysis on the state of the Natura 2000 sites that are subject to the European Commission’s infringement, based on field monitoring conducted in 2021. The following report attempts to provide an analysis of the state of the Natura 2000 sites based on publicly available information provided by the Romanian government and field data from 2023. The sites visited in 2023 were not the same as the ones visited in 2021.

¹ Article iii point 2



Methodology

Prior to field investigations, various analyses took place, which included the evaluation of satellite imagery and assessments and analysis of data from Sumal 2.0 (the Romanian public database of logging permits). Focus was given to those sites which are the subject of the Romanian infringement case: Făgăraş mountains Natura 2000 site (*Munții Maramureșului*, SiteCode: ROSCI0124), Maramures mountains Natura 2000 site (*Munții Maramureșului*, SiteCode: ROSPA0131), Domogled Natura 2000 site (*Domogled - Valea Cernei*, SiteCode: ROSCI0069), Frumoasa Natura 2000 sites (*Frumoasa*, SiteCode: ROSCI0085) but also in Bârnova Natura 2000 sites (Pădurea Bârnova - Repedea, SiteCode: ROSCI0135), which were not part of the initial Infringement case. In total, the team visited four different areas and inspected 14 individual locations within these areas. Two additional locations in Domogled Natura 2000 site were only assessed from the forestry database (Sumal 2.0) as there is currently a court order that has stopped logging in most of this site and furthermore some of the locations were too far for investigators to access on the ground.



Data analysis

Data analysis of satellite imagery and Sumal 2.0² data was carried out before visiting the sites. Investigators looked only for specific logging permits (i.e. APVs) with larger allowable removals in the specific locations. Therefore, not all APVs were recorded. They recorded the volumes authorised for extraction and the type of logging works being carried out. A forest engineer visually estimated the volumes of wood in some of the photos from Sumal and compared this estimate to the volumes declared by the transporters. Data concerning the structure and age of the forests was also recorded. FMPs³ and EIAs/AAs⁴ were checked for each area and recorded if they were available publicly on the official website of the Romanian Ministry of Environment. Where available, information such as forest

2 inspectorulpadurii.ro/

3 <http://www.mmediu.ro/categorie/amenajamente-silvice/347>

4 <http://mmediu.ro/categorie/evaluare-impact/21>

age was derived from FMPs and EIAs/AAs. Maps were reviewed of potentially old-growth forests from different studies, including Pin Matra⁵ and PRIMOFARO⁶. The team specifically focused on identifying large-scale logging from progressive logging or clear-cuts in (previously) intact habitats that had been considered to be in a favourable conservation status according to Article 17 reporting by Romanian authorities under the Habitats Directive. Extra attention was given to potential large-scale logging in very old forest stands, which could be primary, old-growth forests or high biodiversity value forests.

On-foot investigation

When possible, the sites were accessed on foot. Photos were taken of each forest location visited. Details of habitat degradation were captured, such as pollution, erosion from logging roads, and damage to fauna and flora, where available. GPS tracks were recorded with individual observations of each site.

Drone footage

Most sites accessed on foot were also recorded with a drone. The drone footage was analysed for additional evidence of habitat degradation to complement data gathered on foot. For sites which were not accessible on foot, only drone footage was considered for the investigations.

Types of logging

This report identifies several types of logging that are included in logging permits. Romanian legislation describes different types of logging under Order No 2535/2022⁷ and the Forest Code 46/2008⁸. In this report, we have looked at five types, which can be summarised as the following:

- Progressive logging (in Romania legislation, referred as 'tratamentul regenerărilor (tăierilor) progresive' and in APVs, referred as 'T. progresive') - irregular, repeated, successive and uneven cuts in different time periods throughout the "exploitable areas" which leaves gaps in the forest stand to enable natural regeneration. Treatment can last up to 30 years or more.
- Clear-cutting (in Romania legislation, referred as 'tratamentele cu tăieri rase' and in APVs, referred as 'T. rase') - harvesting all trees in an "exploitable area" in a single cut, usually intended to remove/replace unsuitable forests.
- Conservation logging (in Romanian legislation referred as 'lucrările speciale de conservare' and in APVs referred as 'T. conservare') - creating conditions to improve the profitability of the forest, in particular removing trees deemed to be of low-quality as to enable trees with superior characteristics. Limited to 10% of the total area and based on assessments of foresters.
- Accidental logging (in Romanian legislation referred as 'Produse accidentale I & II' and in APVs referred as 'T. produse accidentale') - a "sanitary" logging by removing trees that are impacted by biotitic and/or abiotic factors including dry/drying trees, trees broken by the wind or snow, as well as those that are sick, attacked by pests or impacted by pollution.
- Successive logging (in Romanian legislation referred as 'Tratamentul tăierilor succesive' and in APVs referred as 'T. succesive') - similar to progressive logging but applied to species of trees with a shade temperament, such as fir and beech.
- Logging outside the national forest inventory (referred in APVs as 'T. în vegetația din afara fondului forestier național') - harvesting wood from a forest located outside the official area of the national forests. The owner has to evaluate the wood being removed through logging permits and transport notices. This type of logging is exempted from rules applied to other forestry regimes.

5 http://www.mmediu.ro/app/webroot/uploads/files/2015-12-22_Virgin_forest_Romania_Summary.PDF

6 Schickhofer M. & Schwarz U. (2019): Inventory of Potential Primary and Old-Growth Forest Areas in Romania (PRIMOFARO). Identifying the largest intact forests in the temperate zone of the European Union.

7 <https://legislatie.just.ro/Public/DetaliiDocument/260369>

8 <https://legislatie.just.ro/Public/DetaliiDocument/90768>

The logging regimes mentioned above do not consider aspects/needs of the ecological functions of the forest, including the biodiversity dependent on different types of forest succession.

Maramures Natura 2000 sites

Maramures has a total size of 106867.45 ha and is dominated by Dacian beech forests and subalpine and alpine conifer forests. In Maramures, progressive logging remains the most widespread type of commercial logging, with some locations registering severe habitat degradation as a result of large volumes of logging.

Other areas are being impacted by accidental and conservation logging, such as Repedea, where old-growth forests and touristic trails have been clear-cut and left without any vegetation, degrading both forest and river ecosystems and causing a complete loss of valuable hiking trails. A large percentage of the forests are private or owned by town halls, and there is a lack of information that is publicly available for these forest parcels in Sumal.

Location 1: Poienile de sub munte

GPS coordinates	47° 48'40.2"N 24° 29'55.9"E
Visited on	March 2023
Forest age	Age data ranges from 75 to 90 years old
Exploitation period in 2022 and 2023	Various periods ranging from 31.01.2022 to 31.12.2022
APV - logging type - volume	2100144000101 - Progressive logging - 342.73 m ³ 2100144001310 - Progressive logging - 3687.89 m ³ 2100144000160 - Progressive logging - 1400 m ³ 2100144003280 - Progressive logging - 2019.61 m ³ 2100144002410 - Progressive logging - 1819.02 m ³
Forest owner & administrator	Owner is the Romanian federal government and the administrator is Os Poieni
FMP available online	Yes. UP6 Poieni, from 2016, but not fully transparent on management measures. Parcel description, the forest cutting plan and for other forestry works and records ,surface movements and other important information are missing. Missing pages for example: 1-104, 153-190, 218-...
EIA/AA available online	No
Forest map available online	Yes
Eroded logging roads observed	Yes
Polluted waterways observed	Yes
Steep slopes observed	Yes, frequently over 30 % inclination

Additional notes:

This area has large volumes of wood being logged in Sumal. Between the 5 APVs detailed above over 9000 m³ have been officially extracted. The APVs have expired at the end of 2022, but logging continued in 2023, as evident from numerous transports leaving this area in the last three months. It is unclear if the APVs have been extended here or if logging is illegal, as no APV extensions have been included in Sumal. Also, there are additional strong suspicions of illegal logging, as recent wood transports in Sumal appear to be severely underestimating the total volumes transported (see below three examples).

Neither the FMP nor the EIA/AA were found online. It is therefore assumed that logging in this area is done without an EIA/AA. Furthermore, Romanian law states that progressive logging should only be authorised in forests aged 100+ years in mixed forests. The current logging permits have been given for progressive logging in forests aged 75 yrs (parcel 61A) and 80 yrs (parcel 59A). However, exploiting trees of lower ages are justified if in the FMP, it is determined that the forest has low to medium wood productivity.

When the area was visited, there was active logging, with loggers and tractors moving wood, and therefore the area could not be approached on foot. Instead, drones were used to assess the situation further. From the drone footage, it shows large-scale habitat fragmentation following successive progressive logging in the last two years. Most logging works that have been authorised are for final progressive works but drone photos show large areas of past logging that have not regenerated, leaving behind a barren landscape.

Deep logging roads are present everywhere, with signs of heavy erosion. Large volumes of lower-quality (firewood) appear to have been left behind in the forest, while the quality logs wanted by the industry have been removed.

Once logging activities are completed, further monitoring will need to be undertaken on foot to understand how the forest has been impacted as a result of these recent loggings.



Figure 1: aerial photo of the area impacted by multiple successive logging works, taken in March 2023.



Figure 2: aerial photo showing a close up of an active logging area, taken in March 2023.



Figure 3: aerial photo of area impacted by multiple successive logging works, taken in March 2023.



Figure 4: aerial photo of forest wood depot in the vicinity of the logging site, taken in March 2023.

1 Informații Aviz de Transport

Tip Transport: Locul Recoltării
 Cod Aviz: AP23003786000806553903311529
 Nr. Identificare Mijloc Transport: MM05AALY

Proveniența: 2100144002410 - 645 BARTDAUCINU MARE
 Data Emisiei: 31/03/2023 15:29:45
 Valabilitate: 31/03/2023 15:29:45 - 31/03/2023 21:29:45

Informații Entitățile Implicate


Emitent
 Transportator
 Punct de Descărcare

Denumire: LONGA EXPLO FOREST SRL
 CUI: 35592878

Volum

Grupe Specii	FAG, DIVERSE TARI
Specii	FAG, FALCIN DE MUNTE
Sortimente	Lemn de foc
Total (mc)	8.40400

Poze Transport



2 Transport: Locul Recoltării

Cod Aviz: AP23004846001504529603291507
 Nr. Identificare Mijloc Transport: MM45VIM

Proveniența: 2100144001310 - 608 BARTDAUCINU MARE
 Data Emisiei: 29/03/2023 15:07:55
 Valabilitate: 29/03/2023 15:07:55 - 30/03/2023 01:07:55

Informații Entitățile Implicate


Emitent
 Transportator
 Punct de Descărcare

Denumire: PETRECICA SRL
 CUI: 41684887

Volum

Grupe Specii	RĂȘNOASE
Specii	MOLDO
Sortimente	Lemn rotund
Total (mc)	15.746200

Poze Transport



3 Tip Transport: Locul Recoltării

Cod Aviz: AP23004846001404529603210843
 Nr. Identificare Mijloc Transport: MM45VIM

Proveniența: 2100144001310 - 608 BARTDAUCINU MARE
 Data Emisiei: 21/03/2023 08:43:09
 Valabilitate: 21/03/2023 08:43:09 - 21/03/2023 14:43:09

Informații Entitățile Implicate

Emitent
 Transportator
 Punct de Descărcare

Denumire: PETRECICA SRL
 CUI: 41684887

Volum

Grupe Specii	FAG
Specii	FAG
Sortimente	Lemn rotund
Total (mc)	14.296190

Poze Transport




Figure 5: (1) declaration of vehicle transporting wood on 31.03.23 under APV # 2100144002410 that declared 8.40 m³, while photos are showing an estimated load between 15-20 m³. (2) Declaration of vehicle transporting wood on 29.03.23 under APV # 2100144001310 that declared 15.75 m³, while photos are showing an estimated load between 20-25 m³. (3) Declaration of vehicle transporting wood on 21.03.23 under APV # 2100144001310 that declared 14.29 m³, while photos are showing an estimated load between 25-30 m³.

Location 2: Repedea, Maramures mountains

GPS coordinates	47° 51' 48.8" N 24° 23' 22.2" E
Visited on	March 2023
Forest age	No age data in Sumal
Exploitation period in 2022 and 2023	Various periods ranging from 01.01.2022 to 06.04.2023. There is also one APV dating to 2021.
APV - logging type - volume	2200144002450 - conservation logging - 1876 m ³ 2100144001140 - conservation logging - 2109 m ³ 2100144003700 - conservation logging - 478 m ³ Pre-2022 2000144000061 - conservation logging - 1692 m ³
Forest owner & administrator	Owner Unknown, Administrator is Ocolul Silvic Poieni
FMP available online	No
EIA/AA available online	No
Forest map available online	No
Eroded logging roads observed	Yes
Polluted waterways observed	Yes
Steep slopes observed	Yes, frequently over 40 % inclination

Additional notes:

This area has logging sites identified as primary and old-growth forests in the PRIMOFARO study, and the route to the location was an officially marked hiking route through a beautiful steep valley dominated by old-growth forests.

Unfortunately, the area resembled a war zone: where in the past there were secular forests now there are barren mountains with almost no vegetation left. This aggressive and commercial logging is considered "conservation logging" since progressive or clear-cuts are not allowed on steep slopes of over 35%. However, it is unclear for what conservation this logging is creating, given that the logging is just as bad as clear-cuts and should not be allowed on such steep slopes.

The path that used to be an official hiking trail has been widened using excavators into large logging roads to log the forest on slopes often over 40% inclination. The stream that runs alongside the roads has been polluted by heavy trucks and used as a route to pull down trees from the slopes above. Large volumes of wood have been left behind in the water.

These forests are either private or belonging to the local town halls, and the data on the age or structure of these forest parcels is missing from Sumal. Footage from the drone showed numerous logging roads crossing the landscape, with strong signs of erosion on very steep slopes and tractors pulling wood from the forest.



Figure 6: (top) photo of official hiking trail markings inside Maramures Natura 2000 site; (bottom) photo of recent logging roads and eroded soil. Both photos were taken in March 2023



Figure 7: (top) photo of plastic tubes abandoned on the ground pollute the river and riverbed; (bottom) recently cut logs that have been abandoned on the local river. Both photos were taken in March 2023.



Figure 8: (top) photo of recent logging; (bottom) aerial photo of logged area. Both photos were taken in March 2023.



Figure 9: (top) photo of recent logging with logs being dragged and abandoned in the local river; (bottom) aerial photo of recent logging roads. Both photos were taken in March 2023.

Location 3: Vaser Valley, Viseul de sus

GPS coordinates	47° 44' 46.1" N 24° 33' 20.3" E
Visited on	March 2023
Forest age	There is no age data from Sumal or in other public sources
Exploitation period in 2022 and 2023	Various periods ranging from 29.08.2022 to 23.08.2023
APV - logging type - volume	2300173700360 - Accidental logging - 169.7 m ³ 2300173700480 - Accidental logging - 74.7 m ³ 2200173702770 - Accidental logging - 502.61 m ³ 2200173702780 - Accidental logging - 1719.70 m ³ 2200173701620 - Accidental logging - 527.42 m ³
Forest owner & administrator	Owner Unknown. Administrator is Ocolul Silvic Compososoral S.R.L.
FMP available online	No
EIA/AA available online	No
Forest map available online	No
Eroded logging roads observed	Yes
Polluted waterways observed	Yes
Steep slopes observed	Yes, frequently over 30 % inclination

Additional notes:

Logging permits in this area were given for accidental logging, but from the drone footage little evidence was found of windfells or dead trees to justify these types of interventions. Furthermore, the drone footage also showed several sites that were impacted by habitat fragmentation following recent successive interventions that removed over 2500 m³ in volume, but very little evidence to support the need to remove such large volumes of wood.

Deep logging roads are present everywhere throughout the area, with signs of heavy erosion. Logging is also taking place on steep slopes, of over 30% inclination, and heavy machinery such as excavators and diggers are being used to build new logging roads on steep slopes that are prone to erosion.



Figure 10: (top) close up aerial photo of heavy machinery excavating new logging roads; (bottom) aerial photo of new logging site. Both photos are taken in March 2023.



Figure 11: (top) photo of a local log yard and trucks in the vicinity of the logging site. (bottom) close-up photo of large logs from old forests. Both photos were taken in March 2023.



Figure 12: (left) close up aerial photo of recent logging showing that the majority of trees have been cut and not damaged by wind, as claimed by administrators; (right) aerial photo of local wood depot by the side of the river with signs of wood being dragged through water. Both photos were taken in March 2023.

Domogled Natura 2000 sites

Domogled has a total size of 62118.01 ha and is dominated by Illyrian beech forest. The site was not visited on foot, since most logging is currently suspended following various court decisions based on complaints filed by Agent Green and some of the locations are remote and difficult to reach (e.g. location 5 mentioned below). However, not all forest owners are impacted by these court decisions. Therefore, in some areas, logging is still allowed to continue.

Location 4: Corlan, UPI, OS Brancusi

GPS coordinates	45° 10'53.9"N 22° 46'54.7"E
Visited on	Not visited, information taken from Sumal
Forest age	No age data from Sumal
Exploitation period in 2022 and 2023	Various periods ranging from 01.02.2022 to 30.12.2022
APV - logging type - volume	2100165902090 - Progressive logging - 413.39 m ³ 2200165901740 - Accidental logging - 47.49 m ³
Forest owner & administrator	Owner unknown. Administrator is private: Ocol Os Brancusi
FMP available online	No
EIA/AA available online	No
Forest map available online	No
Eroded logging roads observed	No
Polluted waterways observed	No
Steep slopes observed	Very likely according to Google Earth

Additional notes:

The APVs expired at the end of 2022, but logging continues, as evident from numerous transports leaving this area in the last 3 months. It is unknown if the logging permits have been extended or if logging is illegal, as APV extensions are not shown. Nevertheless, the photos show fresh logs rather than logs that have been left for 3–4 months under the rain. Furthermore, illegal logging is most likely occurring in this area, as recent wood transports in Sumal appear to be severely underestimating the total volumes transported (see below three examples).

Neither the FMP nor the EIA/AA are available online. It is therefore assumed that logging is done without an EIA/AA.

1

Informatii APV

Număr APV: 2100165902090 **UP:** 1 **Natura Produs:** Principale codru
Ocol: OCOLUL SILVIC BRÂNCUȘI **UA:** 178A; 178A; 178A **Fel Taiere / Tratament:** T. progresive (punere în lumină)
Denumire APV: 116-P2-CORLAN **Județ:** GORJ **Perioade de exploatare:** de la 2022-09-15 pana la 2022-09-30, de la 2022-02-01 pana la 2022-04-15
Stare APV: Predat **Volum inițial:** 413.39

Grupă Specie	Volum
FAG	413.39
Total	413.39

Informații Suplimentare

Autorizație de exploatare

Titular: Vixnel Trans S.R.L.

Numar: A220016590014

Emitent: Vixnel Trans S.R.L.

2

Informații Aviz de Transport

Tip Transport: Local Recoctării **Proveniența:** 2100165902090 - 116-P2-CORLAN
Coș Aviz: AP23009263001905583704031205 **Data Emiteii:** 03/04/2023 12:05:48
Identificare Mijloc Transport: GJ169ND **Valabilitate:** 03/04/2023 12:05:48 - 03/04/2023 18:05:48

Informații Entitățile Implicate

Emitent: Denumire: Vixnel Trans S.R.L.
Transportator: CUI: 21783215
Punct de Descărcare:

Grupă Specie	Specie	Sortimente	Total (mc)
FAG	FAG	Lemn de foc, Lemn rotund	13.682320

Volum: _____

Poze Transport

3

Informații Aviz de Transport

Tip Transport: Local Recoctării **Proveniența:** 2100165902090 - 116-P2-CORLAN
Coș Aviz: AP23009263001905583703291230 **Data Emiteii:** 29/03/2023 12:30:08
Nr. Identificare Mijloc Transport: GJ065ND **Valabilitate:** 29/03/2023 12:30:08 - 29/03/2023 18:30:08

Informații Entitățile Implicate

Emitent: Denumire: Vixnel Trans S.R.L.
Transportator: CUI: 21783215
Punct de Descărcare:

Grupă Specie	Specie	Sortimente	Total (mc)
FAG	FAG	Lemn de foc, Lemn rotund	15.384490

Volum: _____

Poze Transport

Figure 13: (1) APV #2100165902090 for progressive logging with an end date of 30.09.2022; however, logging continues in April 2023 given the freshly cut logs shown in Sumal. (2) Declaration of vehicle transporting wood on 29.03.23 under APV #2100165902090, showing freshly cut logs of 15.39 m³, while the photos show an estimated load between 20-25 m³. (3) Declaration of vehicle transporting wood on 03.04.23 under APV #2100165902090, showing freshly cut logs declared as a load of 13.68 m³, while the photos show an estimated load between 20-25 m³.

1 Informatii APV

Număr APV: 2200165901740 UP: 1 Natura Produs: Produse extraordinare

Ocol: OCOLUL SILVIC BRÂNCUȘI UA: 178A; 178A; 178A Fel Taiere / Tratament: T. produse accidentale I

Denumire APV: 231-ISAP116-178-CORLAN Județ: GORJ Perioade de exploatare: de la 2022-11-22 pana la 2022-12-30

Stare APV: Predat Volum inițial: 47.49

Grupă Specie	Volum
FAG	47.49
Total	47.49

Informații Suplimentare

Autorizație de exploatare

Titular: Vixnel Trans S.R.L.

Numar: A220016590243

Emitent: Vixnel Trans S.R.L.

2 Informații Aviz de Transport

Tip Transport: Local Recolectări Proveniența: 2200165901740 - 231-ISAP116-178-CORLAN

Cod Aviz: AP23009263001405583703311248 Data Emisiei: 31/03/2023 12:48:18

Nr. Identificare Mijloc Transport: GJ06SND Valabilitate: 31/03/2023 12:48:18 - 31/03/2023 18:48:18

Informații Entități Implicate

Emitent Denumire: Vixnel Trans S.R.L.

Transportator CUI: 21783215

Punct de Descărcare

Volum

Grupe Specii	Volum
FAG	14.78500
Specii	FAG
Sortimente	Lemn de foc, Lemn rotund
Total (mc)	14.78500

Poze Transport

3 Informații Aviz de Transport

Tip Transport: Local Recolectări Proveniența: 2200165901740 - 231-ISAP116-178-CORLAN

Cod Aviz: AP23009263001305583703311241 Data Emisiei: 31/03/2023 12:41:11

Nr. Identificare Mijloc Transport: GJ16SND Valabilitate: 31/03/2023 12:41:11 - 31/03/2023 18:41:11

Informații Entități Implicate

Emitent Denumire: Vixnel Trans S.R.L.

Transportator CUI: 21783215

Punct de Descărcare

Volum

Grupe Specii	Volum
FAG	13.79780
Specii	FAG
Sortimente	Lemn rotund
Total (mc)	13.79780

Poze Transport

Figure 14: (1) APV #2200165901740 for accidental logging with an end date of 30.12.2022; however, logging continues here in March 2023 judging by the freshly cut logs transported in Sumal (see figures 20 & 21). (2) declaration of vehicle transporting wood on 31.03.23 under APV #2200165901740, showing freshly cut logs and underestimated load: 14.78 m³, while the photos show a load of around 20 m³. (3) declaration of vehicle transporting wood on 31.03.23 under APV #2200165901740, showing freshly cut logs and underestimated load: 13.79 m³, while the photos show a load of around 20 m³.

Location 5: Gusita family-owned land

GPS coordinates	45°06'35.4"N 22°42'06.5"E
Visited on	Not visited, information taken from Sumal
Forest age	No age data from Sumal
Exploitation period in 2022 and 2023	Various periods ranging from 17.01.2022 to 30.06.2023
APV - logging type - volume	2200636904980 - Logging outside the forest fond - 426.87 m ³ 2300636900260 - Logging outside the forest fond - 369.78 m ³ 2300188800030 - Logging outside the forest fond - 241.32 m ³
Forest owner & administrator	Owner Unknown. Administrator is Ocolul Silvic Pades
FMP available online	No
EIA/AA available online	No
Forest map available online	No
Eroded logging roads observed	Yes
Polluted waterways observed	Yes
Steep slopes observed	Yes, frequently over 30% inclination

Additional notes:

This site has naturally reforested for the past 30 years as a result of the abandonment of the mountain pastures. These areas are being logged without any FMPs/EIAs/AAs, despite this area being inside Domogled National Park, Domogled Unesco buffer zone and two Natura 2000 sites (SCI and SPA). While Romanian authorities are spending hundreds of millions of euros of EU funds¹⁰ to artificially plant relatively small areas with new forests (approximately 56,000 ha), they are also cutting down much larger areas of hundreds of thousands of hectares of naturally reforested mountain pastures in an effort to continue receiving EU agricultural subsidies for pastures¹¹, even though most of these pastures have now been abandoned by shepherds for many years.

This location is considered to be just outside the National Forest Fond¹² (area that has been officially declared as a forest). Forested vegetation outside the National Forest Fond is estimated around 838000 ha. There's been an increased logging outside the National Forest Fond, even if these areas are in Natura 2000 sites. In this location, around 1000 m³ have been authorised to be logged. These forests can be logged at any age and on unlimited types of surfaces.

¹⁰ Announcement of EU funds to plant new forests: <https://www.hotnews.ro/stiri-mediu-25925813-start-pentru-56-000-hectare-noi-paduri-pana-2026-fonduri-din-pnrr-bani-pot-primi-proprietarii-terenuri.htm>

¹¹ Requests from the Ministry of Agriculture to the Ministry of the Environment to cut down hundreds of thousands of hectares of reforested mountain pasture: <https://andreiurcanu.ro/2022/08/08/ministerul-agriculturii-vrea-sa-puna-toporul-pe-pasunile-impadurite/>

¹² The National Forest Fond has been evaluated in 2018 at 7037606 ha in the National Forest Inventory: <https://roifn.ro/site/rezultate-ifn-2/>

Informatii APV		
Număr APV: 2200636904980	UP: 87	Natura Produs: Tăieri în vegetație din afara f.f.
Ocol: OCOLUL SILVIC PADEȘ	UA: 2870729183640; 2870729183640; 2870729183640; 2870729183640	Fel Taiere / Tratament: T. în vegetația din afara fondului forestier național
Denumire APV: 7285 Gusita Ioana	Județ: GORJ	Perioade de exploatare: de la 2023-03-08 pana la 2023-07-31
Stare APV: Predat	Volum inițial: 426.87	
	Grupă Specie	Volum
	FAG	370.55
	DIVERSE TARI	5.91
	DIVERSE MOI	50.41
	Total	426.87

Informatii APV		
Număr APV: 2300636900260	UP: 11	Natura Produs: Tăieri în vegetație din afara f.f.
Ocol: OCOLUL SILVIC PADEȘ	UA: 5484,5485,5486..5489; 5484,5485,5486..5489; 5484,5485,5486..5489	Fel Taiere / Tratament: T. în vegetația din afara fondului forestier național
Denumire APV: 7308 Gusita Dionisie	Județ: GORJ	Perioade de exploatare: de la 2023-03-17 pana la 2023-06-30
Stare APV: Predat	Volum inițial: 369.78	
	Grupă Specie	Volum
	FAG	369.78
	Total	369.78

Informatii APV		
Număr APV: 2300188800030	UP: 8	Natura Produs: Tăieri în vegetație din afara f.f.
Ocol: OCOLUL SILVIC BAIA DE ARAMA	UA: 107VAF; 107VAF; 107VAF	Fel Taiere / Tratament: T. în vegetația din afara fondului forestier național
Denumire APV: P 2035 Cantonul 5-T.din A.F.F.-Gușiță Dionisie	Județ: GORJ	Perioade de exploatare: de la 2023-01-31 pana la 2023-05-12
Stare APV: Predat	Volum inițial: 241.32	
	Grupă Specie	Volum
	FAG	238.82
	DIVERSE TARI	2.50
	Total	241.32

Figure 15: three different APVs in one location for logging works outside the National Forest Fond.

1 Tip Transport: Locul Recoltării Proveniența: 2200636904980 - 7285 Gusita Ioana
 Cod Aviz: AP23006528000608540004011143 Data Emiterii: 01/04/2023 11:43:17
 Nr. Identificare Mijloc Transport: GJ99MFA Valabilitate: 01/04/2023 11:43:17 - 02/04/2023 23:43:17

Informații Entitățile Implicate

Emitent	Denumire: Tracagricole Abc S.R.L.
Transportator	CU: 37540620
Punct de Descărcare	

Volum

Grupe Specii	FAG
Specii	FAG
Sortimente	Lemn de foc
Total (mc)	6.818760

2 Informații Aviz de Transport

Tip Transport: Locul Recoltării Proveniența: 2200636904980 - 7285 Gusita Ioana
 Cod Aviz: AP23006528000608540004011143 Data Emiterii: 31/03/2023 16:42:46
 Nr. Identificare Mijloc Transport: GJ89NYN Valabilitate: 31/03/2023 16:42:46 - 31/03/2023 22:42:46


Informații Entitățile Implicate

Emitent	Denumire: Tracagricole Abc S.R.L.
Transportator	CU: 37540620
Punct de Descărcare	

Volum

Grupe Specii	FAG, DIVERSE MOI
Specii	FAG, FLOP TREMURĂTOR
Sortimente	Lemn rotund, Lemn de foc
Total (mc)	8.190000

Poze Transport



3 Informații Aviz de Transport

Tip Transport: Locul Recoltării Proveniența: 2200636904980 - 7285 Gusita Ioana
 Cod Aviz: AP23006528000608540004011143 Data Emiterii: 29/03/2023 09:54:18
 Nr. Identificare Mijloc Transport: GJ89NYN Valabilitate: 29/03/2023 09:54:18 - 30/03/2023 03:54:18

Informații Entitățile Implicate

Emitent	Denumire: Tracagricole Abc S.R.L.
Transportator	CU: 37540620
Punct de Descărcare	

Volum

Grupe Specii	FAG
Specii	FAG
Sortimente	Lemn de foc
Total (mc)	6.448000

Poze Transport




Figure 16: (1) declaration of vehicle transporting wood on 01.04.23 under APV #2200636904980 without photos attached. Attaching photos is a legal requirement in Sumal, for registered companies. Without photos, it is impossible to check what was transported. (2) Declaration of vehicle transporting wood on 31.03.23 under APV 2200636904980 with a declared load of 8.19 m³. (3) Declaration of vehicle transporting wood on 29.03.23 under APV # 2200636904980 showing a similar load on the photo as Figure 22, but this time with a lower declared total volume of 6.44 m³.

Frumoasa Natura 2000 sites

Frumoasa has a total size of 137306.20 ha and is dominated by subalpine and alpine conifer forests. Locations at Frumoasa were being clear-cut and had the highest amount of extractions. Some of the locations were forested areas of 180 years old. In some cases, there were signs of previous clear-cuts dating a couple of years back but logging permits could not be found.

Location 6: Vidra dam

GPS coordinates	45° 27'39.7"N 23° 45'54.3"E
Visited on	March 2023
Forest age	Ages in Sumal range 75 – 120 years old
Exploitation period in 2022 and 2023	Active. Various periods ranging from 01.01.2022 to 30.06.2023
APV - logging type - volume	2200156700460 - Clear-cuts - 1537.63 m ³ 2200156700510 - Clear-cuts - 1583.47 m ³ 2100156700890 - Clear-cuts - 2602.94 m ³ 2100156700820 - Clear-cuts - 1872.77 m ³ 2100156701110 - Clear-cuts - 2139.37 m ³ 2100156700760 - Clear-cuts - 1288.06 m ³
Forest owner & administrator	State property, administrator is Ocolul Silvic Voineasa
FMP available online	Yes, from 2014. Pages 2-3 and 63- to the end are missing.
EIA/AA available online	No
Forest map available online	Yes, but only in Sumal
Eroded logging roads observed	Yes
Polluted waterways observed	Yes
Steep slopes observed	Yes, frequently over 30% inclination

Additional notes:

Over 11,000 m³ will be extracted from the six logging permits for this area, all through clear-cuts. Recent wood transports in Sumal appear to be severely underestimating the total volumes transported (see below two examples). Neither the FMP nor the EIA/AA can be found online. It is therefore assumed that logging occurs without an EIA/AA.

Deep logging roads are present everywhere, with signs of heavy erosion. Logging takes place on steep slopes (over 30%) and heavy machinery is being used to build new logging roads on steep slopes that are prone to erosion.

Further on-foot investigation should take place in the logging area to determine the extent of the impact on the forest.



Figure 17: aerial photo of the area showing a heavily fragmented landscape, taken in March 2023



Figure 18: aerial photo of the area showing several clear-cuts impacting this area, taken in March 2023



Figure 19: aerial close-up photo of a recent clear-cut, taken in March 2023



Figure 20: photo of heavy machinery - excavator - digging a new logging road; (bottom) photo of a forest wood deposit. Both photos are taken in March 2023



Tip Transport: Local Recoltării Proveniență: 2200156700753 - 734+Goata Mica
 Cod Aviz: AP230048920010020+3904051142 Data Emiterii: 05/04/2023 11:42:07
 Nr. Identificare Mijloc Transport: VL082WP Valabilitate: 05/04/2023 11:42:07 - 05/04/2023 21:42:07


Informații entitățile implicate

Emitent
 Transportator Desumiri: SC CCSM SRL
 CU: RO1484928
 Punct de Decoșare:

Volum

Supra Superi	11.8100000
Spica	10000
Sortiment	1.0000000
Total (trc)	19.18400

Poze Transport



Tip Transport: Local Recoltării Proveniență: 2200156700753 - 734+Goata Mica
 Cod Aviz: AP230048920025020+3904051145 Data Emiterii: 05/04/2023 11:45:11
 Nr. Identificare Mijloc Transport: VL74TIM Valabilitate: 05/04/2023 11:45:11 - 05/04/2023 21:45:11

Informații entitățile implicate

Emitent
 Transportator Desumiri: SC CCSM SRL
 CU: RO1484928
 Punct de Decoșare:

Volum

Supra Superi	11.8100000
Spica	10000
Sortiment	1.0000000
Total (trc)	25.008000

Poze Transport




Figure 22: (top) declaration of vehicle transporting wood on 31.03.23 under APV #2200156700460 showing a declared load of 19 m³; (bottom) declaration of vehicle transporting wood on 31.03.23 under APV #2200156700460 showing a declared load of 25 m³. Both of these photos show underestimated loads.

Location 7: Balu

GPS coordinates	45°26'37.0"N 23°40'23.9"E
Visited on	18.03.2023
Forest age	Unknown, no data in Sumal
Exploitation period in 2022 and 2023	Various periods ranging from 01.03.2022 to 10.07.2023. There is also one APV dating back to 2021.
APV - logging type - volume	2200158907030 - Clear-cuts - 692.96 m ³ 2200158905270 - Accidental logging - 466.49 m ³ 2100158905490 - Clear-cuts - 863.25 m ³ 2100158905870 - Clear-cuts - 684.66 m ³ Pre-2022: 2100158901560 - Clear-cuts - 776.40 m ³
Forest owner & administrator	Unknown. Private administrator is Ocolul Silvic Privat Buila
FMP available online	No, but document exists from 2014
EIA/AA available online	No
Forest map available online	No
Eroded logging roads observed	Yes
Polluted waterways observed	Yes
Steep slopes observed	Yes, frequently over 30% inclination

Additional notes:

Logging site is dominated by clear-cuts. As the site is under private management data is missing from Sumal concerning forest maps, management plans, age and structure of the forest.

Neither the Forest management plan nor the EIA/AA are available online. It is therefore assumed that logging is conducted without an EIA/AA.

Deep logging roads are present throughout the area, with signs of heavy erosion. Logging takes place on steep slopes (over 30% inclination) that are prone to erosion.



Figure 23: aerial photo of the area, showing a heavily fragmented landscape, taken in March 2023



Figure 24: (top) aerial close-up drone photo of recent clear-cuts; (bottom) aerial close-up of accidental logging. Both photos were taken in March 2023

1 Informatii APV

Număr APV: 2200158905270	UP: 1	Natura Produs: Produse accidentale
Ocol: OCOLUL SILVIC PRIVAT BUILA	UA: 39D; 39D; 39D; 36B; 36B; 36B; 35A; 35A; 35A; 37A; 37A; 37A; 38D; 38D; 38D	Fel Taiere / Tratament: T. produse accidentale I
Denumire APV: P 2828 TUNARU	Județ: VĂLCEA	Perioade de exploatare: de la 2022-11-28 pana la 2023-03-27
Stare APV: Predat	Volum inițial: 466.49	

Grupă Specie	Volum
RĂȘINOASE	466.49
Total	466.49

2 Informatii APV

Număr APV: 2200158907030	UP: 1	Natura Produs: Principale codru
Ocol: OCOLUL SILVIC PRIVAT BUILA	UA: 101A; 101A	Fel Taiere / Tratament: T. rase benzi alăturate
Denumire APV: P 2846 BALU	Județ: VĂLCEA	Perioade de exploatare: de la 2023-02-10 pana la 2023-07-10
Stare APV: Predat	Volum inițial: 692.96	

Grupă Specie	Volum
RĂȘINOASE	692.96
Total	692.96

Figure 25: APVs for both (1) accidental logging and (2) clear-cuts. Similar damage is observed (Figure 24) despite different logging regimes.

Location 8: Paraul Podelor

GPS coordinates	45°26'37.0"N 23°40'23.9"E
Visited on	18.03.2023
Forest age	Unknown, no data in Sumal
Exploitation period in 2022 and 2023	Various periods ranging from 08.04.2022 to 13.04.2023. There are also APVs dating back to 2021.
APV - logging type - volume	2200071100360 - Successive logging - 195.70 m ³ 2100071101520 - Accidental logging - 610.19 m ³ Pre-2022: 2100071100440 - Accidental logging - 667.20 m ³ 2100071101340 - Accidental logging - 110.21 m ³
Forest owner & administrator	Private forest. Administrator is Ocolul Silvic Miercurea Sibiului
FMP available online	No
EIA/AA available online	No
Forest map available online	No
Eroded logging roads observed	Yes
Polluted waterways observed	Yes
Steep slopes observed	Yes, frequently over 30% inclination

Additional notes:

Recent clear-cuts were observed in the area that took place more than three years ago, but show no signs of forest regrowth, despite the forest legislation asking for replanting to be done in a maximum of two years from logging. The current logging permits are for successive and accidental logging. Former logging permits are no longer available in Sumal. Therefore, information on what type of logging has been carried out in the recent past is missing.

Neither the Forest Management Plan nor the EIA/AA are available online. It is therefore assumed that logging in this area is conducted without an EIA/AA.

Deep logging roads are present everywhere, with signs of heavy erosion. Logging takes place on steep slopes (over 30% inclination) which are prone to erosion.

1		
Informatii APV		
Număr APV: 2200071100360	UP: 5	Natura Produs: Principale codru
Ocol: OCOLUL SILVIC MIERCUREA SIBIULUI	UA: 118 B	Fel Taiere / Tratament: T. succesive, împăduriri sub masiv
Denumire APV: P. 235 - Pr. Podelor	Județ: SIBIU	Perioade de exploatare: de la 2023-01-13 pana la 2023-04-13
Stare APV: Predat	Volum inițial: 195.7	
	Grupă Specie	Volum
	RĂȘINOASE	195.70
	Total	195.70

2		
Informatii APV		
Număr APV: 2100071101520	UP: 5	Natura Produs: Produse accidentale
Ocol: OCOLUL SILVIC MIERCUREA SIBIULUI	UA: 123 E; 123 E; 123 E; 126 A; 126 A; 126 A; 126 E; 126 E; 126 E; 125 C; 125 C; 125 C; 125 A; 125 A; 125 A; 121 A; 121 A; 121 A; 119 A; 119 A; 119 A; 114 E; 114 E; 114 E	Fel Taiere / Tratament: T. produse accidentale I
Denumire APV: P. 195 - Pr. cu Arini	Județ: SIBIU	Perioade de exploatare: de la 2022-04-08 pana la 2022-08-31
Stare APV: Reprimit	Volum inițial: 610.19	
	Grupă Specie	Volum
	RĂȘINOASE	610.19
	Total	610.19

3		
Informatii APV		
Număr APV: 2100071100440	UP: 5	Natura Produs: Produse accidentale
Ocol: OCOLUL SILVIC MIERCUREA SIBIULUI	UA: 117 B; 120 A; 121 A; 126 A; 128 A; 116 C; 125 A	Fel Taiere / Tratament: T. produse accidentale I
Denumire APV: 107 - Pr. cu Arini	Județ: SIBIU	Perioade de exploatare: de la 2021-07-22 pana la 2021-11-18
Stare APV: Reprimit	Volum inițial: 667.2	
	Grupă Specie	Volum
	RĂȘINOASE	667.20
	Total	667.20

Informații Suplimentare		

Figure 26: (1) active APV for successive logging; (2,3) two concluded APVs for accidental logging



Figure 27: close-up aerial photos of recent logging. Both photos were taken in March 2023



Figure 28: (top) aerial close-up of recent logging; (bottom) aerial photo of the area. Both photos were taken in March 2023



Figure 29: aerial photo of logging area, taken in March 2023

Location 9: Paraul Balelor

GPS coordinates	45° 38'30.2"N 23° 38'06.0"E
Visited on	March 2023
Forest age	Old forest, aged 180 years old in Sumal (parcels 3D and 5C)
Exploitation period in 2022 and 2023	Various periods ranging from 03.02.2023 to 30.11.2023. There are also APVs dating back to 2020.
APV - logging type - volume	2200295001640 - Progressive logging - 1485.47 m ³ 2200295001570 - Progressive logging - 1091.89 m ³ Pre-2022 2000295000211 - Accidental logging - 626.00 m ³ 2100295000150 - Accidental logging - 318.00 m ³ 2100295000340 - Accidental logging - 194.00 m ³
Forest owner & administrator	State property. Administrator is Ocolul Silvic Blaj
FMP available online	Yes, from 2018. Pages 224-597 are missing.
EIA/AA available online	No
Forest map available online	Yes, but only in Sumal where a lot of information is missing
Eroded logging roads observed	Yes
Polluted waterways observed	Yes
Steep slopes observed	Yes, frequently over 30% inclination

Additional notes:

This site has forest stands of 180 years old, on average, and with natural species composition dominated by beech with spruce and fir. Also, the ground cover had a 0.9 consistency for parcel 3D and 0.7 for parcel 5C. This suggests that there has not been a major intervention in these parcels recently.

These types of old forests function as a rare sanctuary for all the species dependent on old trees and dead wood, as they are surrounded by mostly young forests. But despite their immense value for biodiversity the decision was made to commercially log these forests, and it is unknown if an EIA/AA has been made as this was not available online. It is therefore assumed that logging is taking place without an EIA/AA.

The Forest Management Plan is available online on the Ministry's website but is heavily censored. Out of 600 pages, only 218 are available and there are no parcel descriptions or detailed maps. The most important data about the logging, care and regeneration plans, and the detailed description of the subplots are missing.



Figure 30: aerial photo of logging area, taken in March 2023



Figure 31: aerial close-up photos of logging area. Both photos were taken in March 2023

Număr APV: 2200295001640	UP: 3	Natura Produs: Principale codru
Ocol: OCOLUL SILVIC BLAJ	UA: 3 D; 3 D; 3 D; 3 D	Fel Taiere / Tratament: T. progresive (însămânțare)
Denumire APV: 706 Pr. Balelor	Județ: ALBA	Perioade de exploatare: de la 2023-02-03 pana la 2023-04-30, de la 2023-09-15 pana la 2023-11-30
Stare APV: Predat	Volum inițial: 1485.47	
Grupă Specie		Volum
DIVERSE TARI		56.17
FAG		869.50
RĂȘINOASE		559.80
Total		1485.47
Informații Suplimentare		
Autorizație de exploatare		
Titular: SC AGRO-MONTANA SRL		
Numar: A230029500016		
Emitent: SC AGRO-MONTANA SRL		
Număr APV: 2200295001570	UP: 3	Natura Produs: Principale codru
Ocol: OCOLUL SILVIC BLAJ	UA: 5 C; 5 C; 5 C; 5 C	Fel Taiere / Tratament: T. progresive (însămânțare)
Denumire APV: 699 Paraul Balelor	Județ: ALBA	Perioade de exploatare: de la 2023-02-09 pana la 2023-04-30, de la 2023-09-15 pana la 2023-11-25
Stare APV: Predat	Volum inițial: 1091.89	
Grupă Specie		Volum
FAG		734.66
RĂȘINOASE		334.82
DIVERSE TARI		22.41
Total		1091.89
Informații Suplimentare		
Autorizație de exploatare		
Titular: SC STEFAN FOREST SRL		
Numar: A230029500018		
Emitent: SC STEFAN FOREST SRL		

Figure 32: two active APVs #2200295001640 and #2200295001570 for first stage progressive logging in parcels 3D and 5C, both aged 180 in Sumal

Informații Aviz de Transport
^

Tip Transport: Locul Recoltării	Provenienta: 2200295001640 - 706 Pr. Balelor
Cod Aviz: AP23006375001701755004031602	Data Emiterii: 03/04/2023 16:02:14
Nr. Identificare Mijloc Transport: AB14DRM	Valabilitate: 03/04/2023 16:02:14 - 04/04/2023 02:02:14

Informații Entități Implicate
^

Emitent	Denumire: SC AGRO-MONTANA SRL
Transportator	CU: 5665552
Punct de Descărcare	

Volum
^

Grupe Specii	RĂȘINOASE
Specii	MOLID
Sortimente	Lemn de foc, Lemn rotund
Total (mc)	17.061800

Poze Transport
^








Figure 33: declaration of vehicle transporting wood on 03.04.23 under APV #2200295001640 from parcel 3D, showing a declared load of 17.06 m³, while the photos seem to suggest an estimated volume of over 20 m³.

Făgăraș Mountains Natura 2000 sites

Făgăraș mountains has a total size of 198711.49 ha and the forests observed in this report are, on average, 180 years old and should be strictly protected. Around 10000 ha to of forests in Făgăraș mountains are already included in the National Catalog of Virgin and Quasi-virgin forests of Romania, and therefore protected. However, there are still thousands of ha of primary and old-growth forests in these mountain still not protected. The decision to progressively log these forests will probably mean a complete removal of most mature trees within 20-30 years. Substantial volumes of wood are being extracted through heavily damaging progressive logging, creating a fragmented and degraded habitat.

Location 10: Valea Valsanului

GPS coordinates	45° 22'07.1"N 24° 43'33.6"E
Visited on	February 2023
Forest age	Unknown, no data in Sumal
Exploitation period in 2022 and 2023	From 22.12.2022 to 30.04.2023
APV - logging type - volume	2200013106710 - Conservation logging - 2177.85 m ³
Forest owner & administrator	Private forest. Administrator is Ocolul Silvic Muntenia
FMP available online	Yes, from 2021
EIA/AA available online	Yes, and EIA from 2021
Forest map available online	No
Eroded logging roads observed	Yes
Polluted waterways observed	Yes
Steep slopes observed	Yes, frequently over 30% inclination

Additional notes:

Valsan valley is the last remaining area where a critically endangered, endemic species of fish (*Romanichthys valsanicola*) lives, a species which was the subject of several conservation projects including projects funded by the European Commission .

In the last river survey, done in October 2022, only 58 individuals of *Romanichthys valsanicola* were identified in an area stretching just over 1 km .

Unfortunately, logging is allowed on the steep slopes surrounding the Valsan River. The most recent logging resulted in the degradation of the Valsan River due to tractors pulling logs through the nearby stream despite assumable negative impacts on *Romanichthys valsanicola*.

13 https://webgate.ec.europa.eu/life/publicWebsite/index.cfm?fuseaction=search.dspPage&n_proj_id=396

14 <https://news.mongabay.com/2022/12/europes-rarest-fish-numbers-spawn-hopes-for-species-survival/>

Agent Green submitted a complaint to the authorities on the 21st of February 2023. Both the Forest Guard and the Environmental Guard visited the site. They fined both the administrators and the logging company but allowed them to continue logging, provided that another logging road is used to bring down logs that does not degrade the river.

The FMP was adopted in 2021 and underwent a full EIA procedure which allowed for 'conservation logging' to take place on steep slopes in the vicinity of Valsan River. It is unclear what type of forest conservation this logging is meant to support, given that the ongoing logging is in complete disregard of critically endangered species such as the *Romanichthys valsanicola*.

The status of this species is now unclear, and it is assumed that this critically endangered species is most likely extinct or has been severely impacted by the forest logging that degraded Valsan River over several weeks.



Figure 34: aerial photo of logging ramp showing muddy, polluted runoff spilling into Valsan River, taken in February 2023.



Figure 35: (top) photo of muddy logging road; (bottom) photo of muddy waters entering Valsan River. Both photos were taken in February 2023



Figure 36: healthy trees being cut through so-called conservation logging, leaving behind an area void of trees. Both photos were taken in February 2023



Figure 37: photos of large-scale erosion caused by recent logging works. Both photos were taken in February 2023.



Figure 38: (top) photo of the heavily polluted Valsan River in Valsan Keys and (bottom) in Bradetu village. Both photos were taken in February 2023.

Număr APV: 2200013106710 UP: 1 Natura Produs: Lucrări de conservare
Ocol: OCOLUL SILVIC MUNTENIA UA: 63 A; 63 A; 63 A Fel Taiere / Tratament: T. conservare
Denumire APV: CONS P : 1314 Județ: ARGES Perioade de exploatare: de la 2022-12-22
Stare APV: Predat Volum inițial: 2177.85 pana la 2022-12-31, de la 2023-01-01 pana
la 2023-04-30

Grupă Specie	Volum
FAG	2174.76
DIVERSE TARI	3.09
Total	2177.85

Informații Suplimentare

Autorizație de exploatare

Titular: TREI BRAZI SRL
Numar: A220001310590
Emitent: TREI BRAZI SRL

Tip Transport: Locul Recoltării Provenienta: 2200013106710 - CONS P : 1314
Cod Aviz: AP23006314001902438204071125 Data Emiterii: 07/04/2023 11:25:57
Nr. Identificare Mijloc Transport: AG17GVG Valabilitate: 07/04/2023 11:25:57 - 08/04/2023 05:25:57

Informații Entitățile Implicate

Emitent Denumire: TREI BRAZI SRL
Transportator CUI: 153608
Punct de Descărcare

Volum

Grupe Specii	FAG
Specii	FAG
Sortimente	Lemn rotund
Total (mc)	19.846580

Poze Transport



Figure 39: (top) logging APV #2200013106710 for conservation logging, approving the extraction of large volumes of wood (2177 m³mc); (bottom) declaration of vehicle transporting wood on 07.04.23 under APV # 2200013106710 for conservation logging showing a declared load of 19.84 m³ while the photos show an estimated volume of over 25 m³.

Location 11: Grosu bridge

GPS coordinates	45° 24'09.7"N 24° 48'51.0"E
Visited on	February 2023
Forest age	Forests are aged 180 to 190 years old on average
Exploitation period in 2022 and 2023	Various periods ranging from 10.03.2022 to 31.05.2023. There is also one APV dating back to 2021.
APV - logging type - volume	2200177702250 - Conservation logging - 312.44 m ³ 2100177703480 - Progressive logging - 2066.98 m ³ Pre-2022: 2100177700210 - Progressive logging - 2143.00 m ³
Forest owner & administrator	State forest. Administrator is Ocolul Silvic Domnesti
FMP available online	Yes, from 2014. Pages 113-418 are missing
EIA/AA available online	No
Forest map available online	No
Eroded logging roads observed	Yes
Polluted waterways observed	Yes
Steep slopes observed	Yes, frequently over 30% inclination

Additional notes:

The age of the forest in this area is between 180-190 years old, on average. These forests are on steep slopes and in the vicinity of other forests that are included in the National Catalogue of Virgin Forests of Romania.

Deep logging roads are present throughout the area, with signs of heavy erosion. Logging occurs on steep slopes (over 30% inclination) that are prone to erosion.

Although the FMP is available online, all plans and detailed records of the forest are missing, including the detailed map as well. Several of the annexes are also partially censored. EIA/AA is not available online and it is therefore assumed that logging operations taking place without an EIA/AA.

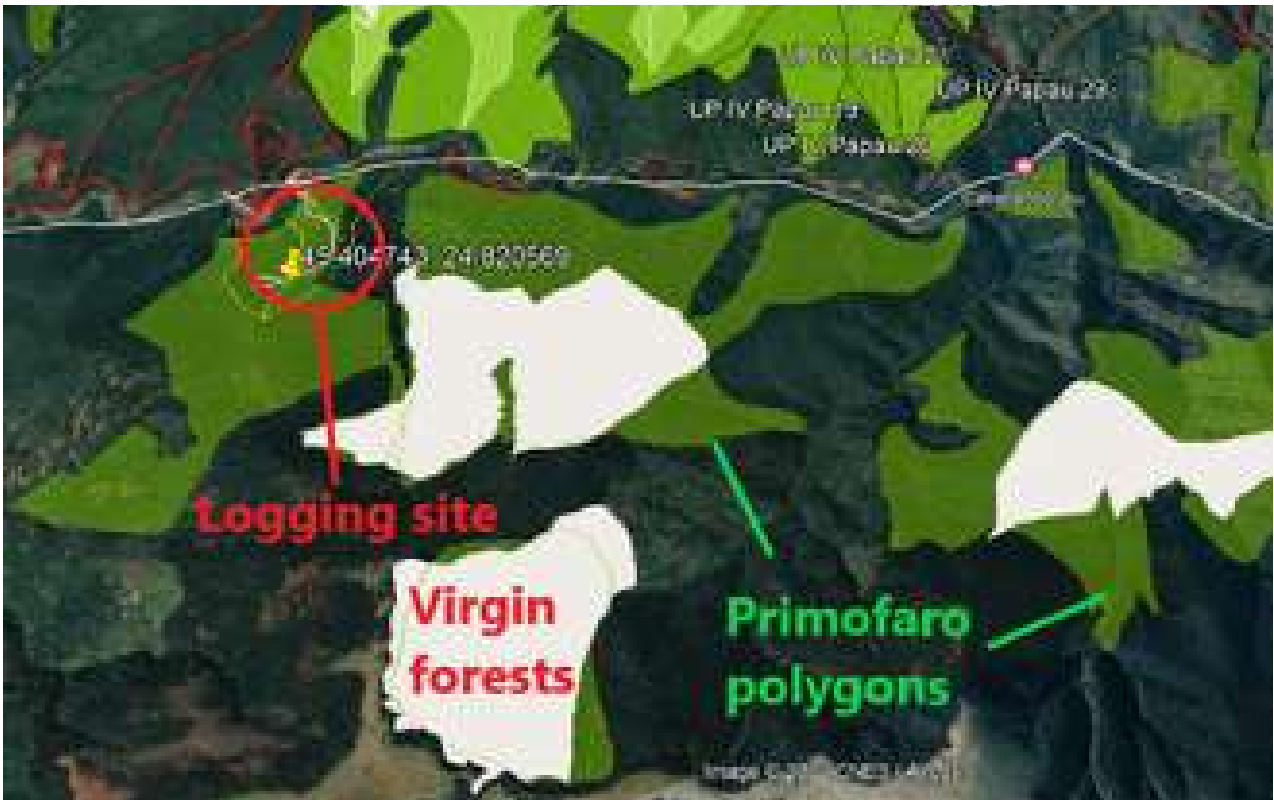


Figure 40: (top) aerial photo showing a large network of new logging roads, taken on 10.02.2023 and (bottom) Google Earth photo of the location of recent logging relative to the Virgin forests in the Romanian National Catalog (in white) and PRIMOFARO study (in green).



Figure 41: (top) photo of the primary ramp for storing logs, near logging site; (bottom) aerial close up of large logs, typical of old forests. Both photos were taken in February 2023.



Figure 42: (top) aerial photo of recent logging. (bottom) aerial close-up of a large logging road, prone to erosion. Both photos were taken in February 2023.

Informatii APV ^

Număr APV: 2200177702250 UP: 4 **Natura Produs:** Lucrări de conservare
 Ocol: OCOLUL SILVIC DOMNEȘTI UA: 193 C; 193 C **Fel Taiere / Tratament:** T. conservare
 Denumire APV: 1032 IZV. BALAURUL Județ: ARGEȘ **Perioade de exploatare:** de la 2023-02-02 pana la 2023-05-31
 Stare APV: Predat Volum inițial: 312.44

Grupă Specie	Volum
RĂȘINOASE	109.61
FAG	202.83
Total	312.44

Informații Suplimentare ^

Autorizație de exploatare

Titular: OCOLUL SILVIC DOMNEȘTI

Numar: A230017770011

Emitent: OCOLUL SILVIC DOMNEȘTI

Informatii APV ^

Număr APV: 2100177703480 UP: 4 **Natura Produs:** Principale codru
 Ocol: OCOLUL SILVIC DOMNEȘTI UA: 190 C; 190 C **Fel Taiere / Tratament:** T. progresive (însămânțare)
 Denumire APV: 795 BALAURUL / 1705512 Județ: ARGEȘ **Perioade de exploatare:** de la 2022-03-10 pana la 2022-09-15
 Stare APV: Reprimit Volum inițial: 2066.98

Grupă Specie	Volum
FAG	1715.24
RĂȘINOASE	351.74
Total	2066.98

Informații Suplimentare ^

Autorizație de exploatare

Titular: DECOR COM DESIGN SRL

Numar: A220017770087

Emitent: OCOLUL SILVIC DOMNEȘTI

Figure 43: (top) active APV #2200177702250 for conservation logging; (bottom) recent APV #2100177703480 for progressive logging, concluded on 15.09.2022.

Location 12: Aninoasa, Sinca Veche

GPS coordinates	45° 43'09.8"N 25° 10'25.2"E
Visited on	February 2023
Forest age	Unknown, no data in Sumal
Exploitation period in 2022 and 2023	From 04.10.2022 until 15.04.2023
APV - logging type - volume	2200154300400 - Progressive logging - 5996.38 m ³
Forest owner & administrator	Private forest. Administrator is Regia Publică Locală Ocolul Silvic Pădurile Șincii R.A.
FMP available online	No
EIA/AA available online	No
Forest map available online	No
Eroded logging roads observed	Yes
Polluted waterways observed	Yes
Steep slopes observed	Yes, frequently over 30% inclination

Additional notes:

The site is dominated by large progressive logging (5996 m³ in just one APV). This site is, however, under private management and therefore, data is missing from Sumal concerning forest maps, management plans, age and structure of the forest.

Neither the FMP nor the EIA/AA are available online. It is therefore assumed that logging occurs without an EIA/AA.

Deep logging roads are present everywhere, with signs of heavy erosion. Logging occurs on steep slopes (over 30% inclination) that are prone to erosion.



Figure 44: aerial photo of the area impacted by progressive logging, taken in February 2023.



Figure 45: photos illustrating several eroded logging roads, some still in use. Both photos were taken in February 2023.



Figure 46: photos of various machines at work transporting wood, both in small and large trucks. Both photos were taken in February 2023.

Număr APV: 2200154300400	UP: 1	Natura Produs: Principale codru
Ocol: REGIA PUBLICĂ LOCALĂ OCOLUL SILVIC PĂDURILE ȘINCII R.A.	UA: 208 A; 208 A	Fel Taiere / Tratament: T. progresive (racordare)
Denumire APV: 2960 - Aninoasa - P R	Județ: BRAȘOV	Perioade de exploatare: de la 2022-10-04 pana la 2023-04-15
Stare APV: Predat	Volum inițial: 5996.38	

Grupă Specie	Volum
DIVERSE TARI	102.28
QVERCINEE	102.82
DIVERSE MOI	27.21
FAG	5764.07
Total	5996.38

Informații Suplimentare

Autorizație de exploatare	Titular: EXPLO MOLDOVAN SRL Numar: A220015430129 Emitent: REGIA PUBLICĂ LOCALĂ OCOLUL SILVIC PĂDURILE ȘINCII R.A.
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Figure 47: APV #2200154300400 for progressive logging with a large volume of wood to be extracted (5996 m³) despite a lack of an FMP and EIA/AA.

Location 13: Sercaita

GPS coordinates	45° 42' 35.3" N 25° 08' 00.5" E
Visited on	February 2023
Forest age	Unknown, no data in Sumal
Exploitation period in 2022 and 2023	Various periods ranging from 11.03.2022 to 29.12.2023. There are also APVs dating back to 2020 and 2021.
APV - logging type - volume	<p>2200154301890 - Progressive logging - 2826.34 m³ 2200154301450 - Accidental logging - 985.71 m³ 2200154300030 - Progressive logging - 2872.99 m³ 2200154300330 - Accidental logging - 1079.97 m³</p> <p>Pre-2022: 2100154300041 - Progressive logging - 2499.00 m³ 2100154300250 - Accidental logging - 1429.97 m³</p>
Forest owner & administrator	Private forest. Administrator is Regia Publică Locală Ocolul Silvic Pădurile Șincii R.A.
FMP available online	No
EIA/AA available online	No
Forest map available online	No
Eroded logging roads observed	Yes
Polluted waterways observed	Yes
Steep slopes observed	Yes, frequently over 30% inclination

Additional notes:

This area has large volumes of wood (over 10,000 m³) being extracted in a time frame of three years from progressive and accidental logging. This forest is under private management and therefore data is missing from Sumal concerning forest maps, management plans, age and structure of the forest.

Deep logging roads are present throughout the area, with signs of heavy erosion. Logging occurs on steep slopes (over 30% inclination) that are prone to erosion.

Neither the FMP nor the EIA/AA are available online. It is therefore assumed that logging occurs without an EIA/AA.



Figure 48: aerial photos of areas affected by recent progressive and accidental logging, taken in February 2023.



Figure 49: aerial photos of areas impacted by recent logging, taken in February 2023.



Figure 50: aerial photo of area impact by new logging roads prone to future erosion, taken in February 2023.



Figure 51: aerial photo of logging equipment and logs from active logging area, taken in February 2023.

Bârnova Natura 2000 (not included in the complaint)

Bârnova has a total size of 12234.18 ha and dominated by Dacian oak and hornbeam forests as well as beech forests. Bârnova Natura 2000 has not been included in complaint CHAP(2019)02656. However, some of these forest stands have impressive ages of 120 – 170 years old, on average, and therefore, on-the-ground monitoring took place to compare with the sites in the complaint. These mature forests are located close to the city of Iași and important for hiking, tourism, and air quality for the city. However, these old forest stands are targeted by aggressive commercial logging that aim to rapidly remove as much wood as possible.

Location 14: Pietrosu

GPS coordinates	46°59'32.0"N 27°40'17.5"E
Visited on	February 2023
Forest age	120 years old, on average
Exploitation period in 2022 and 2023	Various periods ranging from 04.01.2022 to 30.09.2023
APV - logging type - volume	2200106600720 - Progressive logging - 2557.37 m ³ 2100106600240 - Progressive logging - 1988.92 m ³
Forest owner & administrator	State forest. Administrator is Ocolul Silvic Dobrovăț
FMP available online	Yes, from 2018. Pages 146 - 328 missing.
EIA/AA available online	No
Forest map available online	Yes, but only in Sumal
Eroded logging roads observed	Yes
Polluted waterways observed	Yes
Steep slopes observed	No

Additional notes:

The forest stands in this area are less than 5 km away from Iași city with minimal forest management. Progressive logging occurs across the road from a small, strictly protected zone called Pietrosu Reservation (80 ha). The forest in this reservation has the same age and composition as the forest that is being logged. It is, therefore unclear why the strict protection is applied only to a small 80 ha patch and not to the whole area, given that they both show old-growth forest characteristics. Once the progressive logging is complete, this forest will be severely degraded and can no longer function as a healthy habitat for all the species dependent on mature forests.

The FMP is heavily censored. All plans and detailed records of the forest are missing, including the detailed maps. EIA/AA is not available online.

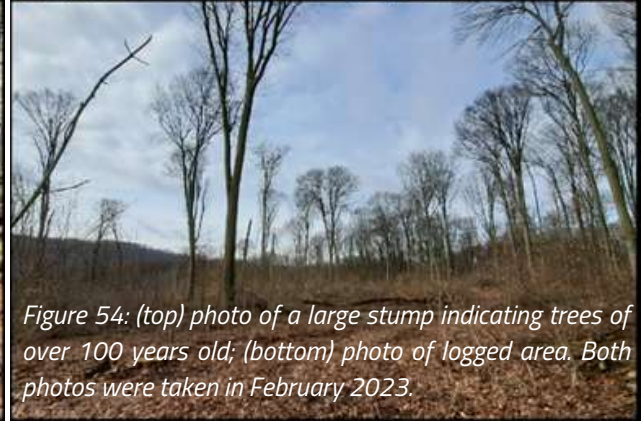


Figure 53: (top) aerial photo of active logging area; (bottom) photo of logging ramp in the forest. Both photos were taken in February, 2023.

Figure 54: (top) photo of a large stump indicating trees of over 100 years old; (bottom) photo of logged area. Both photos were taken in February 2023.



Figure 55: (left) aerial photo of active logging area; (right) aerial close-up photo of logs from recent logging. Both photos were taken in February 2023.

Număr APV: 2200106600720 **UP:** 2 **Natura Produs:** Principale codru
Ocol: OCOLUL SILVIC DOBROVĂȚ **UA:** 26 D; 26 D **Fel Taiere / Tratament:** T. progresive (punere în lumină)
Denumire APV: 285 **Județ:** IAȘI
Stare APV: Predat **Volum inițial:** 2557.37 **Perioade de exploatare:** de la 2023-09-15 pana la 2023-09-30, de la 2023-01-11 pana la 2023-04-15

Grupă Specie	Volum
FAG	764.30
QVERCINEE	48.75
DIVERSE MOI	240.32
DIVERSE TARI	1504.00
Total	2557.37

Informații Suplimentare ^

Autorizație de exploatare

Titular: OCOLUL SILVIC DOBROVĂȚ

Numar: A230010660002

Emitent: OCOLUL SILVIC DOBROVĂȚ

Număr APV: 2100106600240 **UP:** 2 **Natura Produs:** Principale codru
Ocol: OCOLUL SILVIC DOBROVĂȚ **UA:** 26 E **Fel Taiere / Tratament:** T. progresive (însămânțare, punere în lumină)
Denumire APV: 178 **Județ:** IAȘI
Stare APV: Reprimit **Volum inițial:** 1988.92 **Perioade de exploatare:** de la 2022-01-04 pana la 2022-03-31

Grupă Specie	Volum
DIVERSE MOI	327.47
FAG	1190.64
DIVERSE TARI	470.81
Total	1988.92

Informații Suplimentare ^

Autorizație de exploatare

Titular: SC EURO B.A.COS SRL

Numar: A220010660001

Emitent: SC EURO B.A.COS SRL

Figure 56: active APV #2200106600720 and APV #2100106600240, concluded on 31.03.2022, for progressive logging in forest parcels 26D and 26E.

Location 15: Poieni

GPS coordinates	47°03'25.4"N 27°40'18.8"E and 47°03'09.5"N 27°39'59.5"E
Visited on	18.02.2023
Forest age	average 120 - 130 years
Exploitation period in 2022 and 2023	Various periods ranging from 04.01.2023 to 27.10.2023
APV - logging type - volume	2100105900590 - Progressive logging - 2167.92 m ³ 2200105900480 - Progressive logging - 940.34 m ³ 2100105900120 - Progressive logging - 1462.50 m ³
Forest owner & administrator	State forest. Administrator is Ocolul Silvic Lunca Cetățuiei
FMP available online	Yes, from 2018. Pages 147-416 missing
EIA/AA available online	No
Forest map available online	Yes, but only in Sumal
Eroded logging roads observed	Yes
Polluted waterways observed	Yes
Steep slopes observed	No

Additional notes:

The forest stands in this area are between 120-130 years old based on SUMAL with active progressing logging, intending to remove around 4500 m³ in a time period of 3 months. Although an FMP is available online, all plans and detailed records of the forest are missing, including the detailed map.

Local groups in the area are actively using the forest for hiking, cycling, running, and wildlife watching, according to several conversations with local people. They have noticed that commercial logging in the area is degrading the area they are often using. Local groups are now requesting that this area become a Natural Park, which would involve some strict protection (usually around 50%).



Figure 57: (left) photo of a large stump from a logged tree that is estimated to be over 200 years old; (right) photo showing the start of progressive logging in a previously intact forest. Both photos were taken in February 2023.



Figure 58: (top) aerial photo of active logging area with recently cut logs; (bottom) aerial photo of the logging site. Both photos were taken in February 2023.



Figure 59: (top) aerial photo of the second active site in the area; (bottom) close-up aerial photo of the loggers' campsite. Both photos were taken in February 2023.



Figure 60: aerial photos of active logging sites. Both photos were taken in February 2023.







Tip Transport: Locul Recoltării	Proveniența: 2100105900120 - 120 Poieni	
Cod Aviz: AP23000805001702102302160912	Data Emiterii: 16/02/2023 09:12:32	
Nr. Identificare Mijloc Transport: BT03COS	Valabilitate: 16/02/2023 09:12:32 - 16/02/2023 15:12:32	
Informații Entități Implicate		
Emitent	Denumire: SC REBO-FOREST SRL	
Transportator	CU: 13402964	
Punct de Descărcare		
Volum		
Poze Transport		
		
Tip Transport: Locul Recoltării	Proveniența: 2100105900120 - 120 Poieni	
Cod Aviz: AP23000805001602102302151542	Data Emiterii: 15/02/2023 15:42:18	
Nr. Identificare Mijloc Transport: BT03COS	Valabilitate: 15/02/2023 15:42:18 - 15/02/2023 21:42:18	
Informații Entități Implicate		
Emitent	Denumire: SC REBO-FOREST SRL	
Transportator	CU: 13402964	
Punct de Descărcare		
Volum		
Poze Transport		
		

Figure 61: declaration of vehicles transporting wood for APV #2100105900120 showing photos of ancient trees being removed from logging site.

Location 16: Tomesti

GPS coordinates	47°04'42.5"N 27°40'24.0"E
Visited on	February 2023
Forest age	110 - 120 years old
Exploitation period in 2022 and 2023	Various periods ranging from 10.01.2023 to 15.03.2023. There is also one APV that dates back to 2021.
APV - logging type - volume	2100105901380 - Progressive logging - 1817.55 m ³ 2200105900670 - Progressive logging - 762.55 m ³ Pre-2022: 2100105900420 - Progressive logging - 2072.00 m ³
Forest owner & administrator	State forest. Administrator is Ocolul Silvic Lunca Cetățuui
FMP available online	Yes, from 2018. Pages 151-490 missing
EIA/AA available online	Unknown
Forest map available online	Only in Sumal
Eroded logging roads observed	Yes
Polluted waterways observed	Yes
Steep slopes observed	No

Additional notes:

The area is now a heavily fragmented landscape that has been subjected to multiple logging permits. Access to the site on foot was blocked by workers. Therefore, drone footage was used to understand the level of degradation. The area needs to be revisited again to better document the area on foot. Furthermore, analysis of photos reported in Sumal for this area shows trucks leaving logging sites with sawdust. This is controversial as large logs are potentially being chopped in the forest and not declared.

Although an FMP is available online, all plans and detailed records of the forest are missing, including the detailed map.

This area is also used by the local community for hiking, cycling, running, wildlife watching and want this area protected from logging. They have put an application forward to further protect the area, but no moratorium has been placed on logging in this area.



Figure 62: (1) aerial photo of active logging area; (2) aerial close-up of active logging area. (3) Photo of a tractor at work inside logging area; (4) aerial close-up of active logging area. Photos were taken in February 2023.

Tip Transport: Local Recolțări Proveniența: 2100105901380 - 311 Tomesti
 Cod Arit: AP2301014001700030102171830 Data Emiterii: 17/02/2023 15:20:11
 Nr. Identificare Mijloc Transport: NT18PST Valabilitate: 17/02/2023 15:20:11 - 18/02/2023 09:20:11


Informații Entitățile Implicate

Emitent: Denumire: SC PRICOFORREST SRL
 Transportator: CUI: 14999411
 Punct de Descărcare:

Volum

Grupa Specii	DIVERSE TARZI, FAG
Specii	FAGUS DE MUNTRE, FAG
Destinație	Lemn rotund
Total (mc)	17.27022

Poze Transport



Tip Transport: Local Recolțări Proveniența: 2100105901380 - 311 Tomesti
 Cod Arit: AP230101400150015001511511 Data Emiterii: 17/02/2023 16:11:56
 Nr. Identificare Mijloc Transport: NT147DT Valabilitate: 17/02/2023 16:11:56 - 18/02/2023 10:11:56


Informații Entitățile Implicate

Emitent: Denumire: SC PRICOFORREST SRL
 Transportator: CUI: 14999411
 Punct de Descărcare:

Volum

Grupa Specii	DIVERSE TARZI, FAG
Specii	FRAGA DE CĂMĂRĂȘTI DE PLATE, FAG
Destinație	Lemn rotund
Total (mc)	19.30010

Poze Transport



Tip Transport: Local Recolțări Proveniența: 2100105901380 - 311 Tomesti
 Cod Arit: AP230101400150015001511511 Data Emiterii: 17/02/2023 14:17:43
 Nr. Identificare Mijloc Transport: NT22FD1 Valabilitate: 17/02/2023 14:17:43 - 18/02/2023 09:17:43


Informații Entitățile Implicate

Emitent: Denumire: SC PRICOFORREST SRL
 Transportator: CUI: 14999411
 Punct de Descărcare:

Volum

Grupa Specii	DIVERSE TARZI, DIVERSE TARZI
Specii	OSORIN (SI) TE ARBENTILULE ARHEN, FRAGUS JUVAETRU, DIVERSE
Destinație	Tăbăcuț proveniență din lemn
Total (mc)	29.33390

Poze Transport



Tip Transport: Local Recolțări Proveniența: 2100105901380 - 311 Tomesti
 Cod Arit: AP230101400150015001511511 Data Emiterii: 17/02/2023 11:44:59
 Nr. Identificare Mijloc Transport: NT14JDC Valabilitate: 17/02/2023 11:44:59 - 18/02/2023 03:44:59

Informații Entitățile Implicate

Emitent: Denumire: SC PRICOFORREST SRL
 Transportator: CUI: 14999411
 Punct de Descărcare:

Volum

Grupa Specii	DIVERSE TARZI, DIVERSE TARZI
Specii	FRAGUS PLAT, DIVERSE
Destinație	Tăbăcuț proveniență din lemn
Total (mc)	10.00626

Poze Transport




Figure 63: (top two photos) declaration of vehicle transporting wood on 17.02.23 under APV # 2100105901380 for progressive logging, showing large ancient trees being removed from logging site.; (bottom two photos) photo of trucks full of sawdust, showing evidence that a mobile chopper is being used in the forest.

Conclusions

The following table summarises the volume that has been allowed to be extracted in 2022 and 2023 in the 16 different locations that have been visited:

Location name	Timeframe of logging	Type of logging	Volume allowed to be extracted
Poienile de sub munte, Maramures	12 months	Progressive	9269.25 m ³
Repedea, Maramures	16 months	Conservation	4463.00 m ³
Vaser Valley, Maramures	18 months	Accidental	2994.13 m ³
Corlan, Domogled	10 months	Progressive & accidental	460.88 m ³
Gusita, Domogled	5 months	Logging outside the forest fond	1037.97 m ³
Vidra dam, Frumoasa	18 months	Clear cut	11024.24 m ³
Balu, Frumoasa	8 months	Clear cut & accidental	2707.36 m ³
Paraul Podelor, Frumoasa	3 months	Successive	805.89 m ³
Paraul Balelor, Frumoasa	9 months	Progressive	2577.36 m ³
Valea Valsanului, Făgăraş	4 months	Conservation	2177.85 m ³
Grosu bridge, Făgăraş	4 months	Conservation	2379.42 m ³
Aninoasa, Făgăraş	5 months	Progressive	5996.38 m ³
Sercaita, Făgăraş	12 months	Progressive	7765.01 m ³

Pietrosu, Bârnova	6 months	Progressive	4546.29 m ³
Poieni, Bârnova	10 months	Progressive	4570.76 m ³
Tomesti, Bârnova	2 months	Progressive	2580.1 m ³

The most widely spread logging type in the locations analysed is progressive logging, making up around 58% of the total logging allowed to be extracted. Field investigators have observed that progressive logging has been extremely damaging to the Natura 2000 sites. Investigated areas would sometimes resemble clear-cuts due to several years of progressive logging. The barren landscape in the aerial photographs of Poienile de sub munte forest (figures 1 - 4) is one example. Foresters should, in theory, respect the physiological rhythm of the forest and the dynamics of the natural regeneration process when applying progressive logging. Unfortunately, most progressive loggings occur at faster intervals, causing the forest to lose its regenerative capacity. In practice, progressive logging usually results in barren landscapes similar to areas that have been clear-cut within 15-20 years, or sooner.

Other types of logging are also problematic. For example, successive logging is similar to progressive logging and shares the similar faulty treatment application. Conservation logging is based on the subjective assessment of foresters that usually propose areas that are not intended for wood production. In accidental logging, there have been previous cases of healthy trees being removed or enabling trees to dry out so that the trees can be considered accidental products.

This report looked at 47 APVs in 2022 and 2023 in 16 locations. The Romanian database of logging permits (Sumal) currently shows 426339 APVs as of 30th of May 2023. Of these 47 APVs that were analysed, the total amount that was allowed to be extracted was 65355.89 m³ within a 24-month period¹⁵, which is equivalent to around 299.79 ha¹⁶ of forests. This translates to a land size of around 420 football fields. This only looks at what was allowed to be removed in logging permits and does not consider what was illegally removed. The observations of transport vehicle declarations showed that foresters tend to underreport their total load, around 20 to 50% less, highlighting that illegal logging is still occurring. Furthermore, the transport of wood from the forest is allowed for another 120 days after the end of an APV, most likely further enabling illegal logging. Also, the 299.79 ha does not take into account the degradation that is also caused by logging roads and erosion. Therefore, hundreds more forested hectares were most likely removed from just analysing 0.01% of the total APVs displayed in Sumal.

It is also important to mention that, according to their Standard Data Forms, all five Natura 2000 sites are Sites of Community Interest (SCIs), declared in 2007 and confirmed in 2009; these sites have yet to be designated as Special Areas of Conservation (SACs). Under the Habitats Directive, an SCI must be designated as an SAC within six years. To designate an SAC, a site must, amongst many aspects, have a management plan. Nevertheless, commercial logging is still allowed in these Natura 2000 sites.

¹⁵ The earliest start of a logging permit is on 01.01.2022 and the latest end of a logging permit is 29.12.2023

¹⁶ According to a study in 2014, the average volume per ha in Romanian forests is about 218 m³. Study: Rusu, E. and Brodner, C.A.D., 2014. Structural dynamics of Romanian forests after 1990. Present Environment and Sustainable Development, (1), pp.17-35

The latest data analysis and field investigation also illustrate a lack of transparency in forest management. Of the 16 analysed locations, more than 50% of FMPs were not publicly available online. Of the FMPs available, almost 75%-80% had been censored and therefore, not useful to monitor the management being applied in the area. Since the end of 2020, Romanian authorities have been requesting EIAs/AAs for FMPs, and almost all FMPs adopted after 2022 have an EIA/AA. Most of the FMPs detailed in this report are before 2020, hence the lack of EIAs/AAs.

The recent Emergency regulation, EGO 177/2022, will, unfortunately, not tackle this problem of non-transparency. Without environmental information being made publicly available, citizens cannot monitor or challenge decisions made concerning forest management. This also includes civic control over whether permits have been granted in line with the recommendations of impact assessments when these are carried out. Consequently, citizens are being prevented from referring to the court even in cases where there is a serious risk of deterioration of habitats and species protected under the Habitats Directive.

Regarding impact assessments, none of the locations had AAs for their FMPs, even though AAs are required for FMPs in Natura 2000 sites. Only one location had an EIA for its FMP, but the quality of the EIA itself was poor and did not include any aspects of the species for which the site is protected. The methodology that defines the process of conducting AAs for forest activities has been recently approved through a Governmental Decision¹⁷. However, such governmental decisions can be suspended or nullified in court per Law 554/2004.

In November 2021, the Romanian government tried to pass the Governmental Decision to define a methodology for implementing AAs but failed when the court challenged the decision. Private forest owners will not carry out AAs in their FMPs without this methodology. Although implementing AAs in state-owned forests should be more feasible if there is political will and commitment from the government to deliver AAs without any legally binding legislation, incontestable legislation should still be passed to ensure AAs are applied to private forests. Furthermore, the new EGO 177/2022 sets the deadline to start defining AAs of FMPs by, latest, September 2023. There is currently no deadline to complete them; therefore, it is uncertain when AAs will be completed.

It is also expected that after AAs are finalised, FMPs will be re-drafted and adapted to reflect the recommendations in the AAs. Consequently, logging permits are also expected to be retracted where needed. However, this is assumed and not given that this will be done. Meanwhile, logging continues regardless of whether AAs have been done for FMPs. Therefore, while logging continues unabated, no assessment is being carried out to determine the level of impact any of the logging regimes might have on the conservation objectives of these protected areas.

Even if AAs are conducted for all FMPs, and these plans are properly consulted and monitored by civil society, it does not change the fact that Governmental Decision 236/2023¹⁸, the Technical Norms Order no 1540/2011, and the Technical Norms Order no 2535/2022, which support the implementation of the Forest Code of 2008, still do not consider the impact of logging types on the ecological function of the forests. In particular, progressive logging is considered to align with the conservation objectives of the Natura 2000 sites. With the current national laws, old-growth and primary forests in Natura 2000 sites will continue to be subject to complete logging, including through progressive logging, probably within 20 to 30 years. Furthermore, the Forest Code does not make it a criminal offence to log outside the national inventory of forests, even if this logging takes place in a Natura 2000 forested area, and

instead, fines are applied. These fines are not sufficient to deter illegal logging. Also, the volume of wood legally allowed to be removed outside the forest inventory is no longer subjected to a cap of 5 or 10 m³ and can be thousands of m³ as observed in the Domogled Natura 2000 site.

In summation, Romanian forest laws are not aligned to meet the conservation objectives of Natura 2000 sites as EU environmental law requires. Romanian laws still allow for the gradual or complete removal of entire forest cover and disregard the potential deterioration of certain protected habitats. Therefore, a moratorium is recommended in all protected forests until AAs are conducted for all FMPs and logging permits are re-assessed. Furthermore, national laws should be changed regarding logging regimes to ensure that these align with the conservation objectives of protected areas. Particular attention should be given to progressive logging. Lastly, the national inventory of forests should be updated to include all forests in Natura 2000 sites.

ANNEX

Location name	Owner	Administrator	Active logging	FMP online	EIA/AA online
Poienile de sub munte, Maramures	Romanian state. OS POIENILE DE SUB MUNTE	Romanian state. OS POIENILE DE SUB MUNTE	Logging permits ended in Dec 2022, but wood transport continues as of April 2023	Yes, censored, from 2016	No
Repedea, Maramures	Private owner	Romanian State: OS POIENI	Yes, until 06.04.2023	No	No
Vaser Valley, Maramures	Private owner	Private administrator: Os Composesoral S.R.L.	Yes, until 06.04.2023	No	No
Corlan, Domogled	Private owner	Private administrator: Os Brancusi.	No. logging permits ended in Dec 2022, but transport of wood continues as of April 2023	No	No
Gusita, Domogled	Private owner	Romanian State: Os Pades	Yes, until 06.04.2023	No	No
Vidra dam, Frumoasa	Romanian State: Os Voineasa	Romanian State: Os Voineasa	Yes, until 30.06.2023	Yes, censored, from 2014	No

Location name	Owner	Administrator	Active logging	FMP online	EIA/AA online
Balu, Frumoasa	Private owner	Private administrator: Os Privat Buila	Yes, until 10.07.2023	No	No
Paraul Podelor, Frumoasa	Private owner	Private administrator : Os Miercurea Sibiului	Yes, until 13.04.2023	No	No
Paraul Balelor, Frumoasa	Romanian State: Os Blaj	Romanian State: Os Blaj	Yes, until 30.11.2023	Yes, censored, from 2018	No
Valea Valsanului, Făgăraș	Private owner	Private administrator: Os Muntenia.	Yes, until 30.04.2023	Yes, censored, from 2021	Yes, from 2021
Grosu bridge, Făgăraș	Romanian State. OS Domnesti	Romanian State. OS Domnesti	Yes, until 31.05.2023	Yes, censored, from 2014	No
Aninoasa, Făgăraș	Private owner	Private administrator : Regia Publică Locală Ocolul Silvic Pădurile Șincii R.A.	Yes, until 15.04.2023	No	No
Sercaita, Făgăraș	Private owner	Private administrator : Regia Publică Locală Ocolul Silvic Pădurile Șincii R.A.	Yes, until 29.12.2023	No	No
Pietrosu, Bârnova	Romanian State: Os Dobrovăț	Romanian State: Os Dobrovăț	Yes, until 30.09.2023	Yes, censored, from 2018	No

Location name	Owner	Administrator	Active logging	FMP online	EIA/AA online
Poieni, Bârnova	Romanian State: Os Lunca Cetățuui	Romanian State: Os Lunca Cetățuui	Yes, until 27.10.2023	Yes, censored, from 2018	No
Tomesti, Bârnova	Romanian State: Os Lunca Cetățuui	Romanian State: Os Lunca Cetățuui	Yes, until 15.03.2023	Yes, censored, from 2018	No