Natura 2000 and Forests - the Romanian Status Quo

A Photo Documentation

by

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1. Introduction: Natura 2000 and forest protection in Romania

Romania holds the largest share of old-growth and primary forests within the EU outside of Scandinavia. The degree of naturalness of Romania's forests is exceptionally high in comparison to the rest of the temperate climate zone of Europe. The recently published *PRIMOFARO* inventory (EuroNatur 2019)[1] reveals the potential existence of more than 525,000 hectares of primary and old-growth forest in Romania. This represents around 8% of Romania's total forest cover and by far constitutes the largest clusters of very close-to-nature (old-growth and primary) forest in any EU country within the temperate climate zone. In comparison, less than 4% of the forests within the EU are in a more natural status, more or less "undisturbed by man" (Forest Europe 2015)[2].

332,844 hectares (63%) of the potential primary and old-growth forests identified in the *PRIMOFARO* inventory are located within Natura 2000 sites, which also overlap with national parks. It theory and on paper, these old-growth and primary forests are supposedly "protected" by Natura 2000 sites, which were established under the provisions of the EU's cornerstone nature conservation legislation, the Birds and Habitats Directives.

However, contrary to the objectives of these directives, this natural heritage is vanishing before our eyes. Even in these supposedly "protected areas" intensive logging operations continue to destroy and degrade natural forests.

To highlight the ongoing loss of natural forests, one need only reference the 2005 *Pin Matra*[3] inventory, a study of "virgin forests" in Romania. Although not entirely comprehensive, at that time, around 220,000 hectares of "virgin forests" were identified. Since that time, only 116,589 hectares (or 55%) still appear to be in an intact status. In other words, 45% of the "virgin forests" identified in 2005 and which should be protected under law appear to have been lost in a decade and a half.

The Birds and Habitats Directives require that Member States prevent the significant deterioration of the conservation status of listed natural habitat types and species and to undertake positive management measures to ensure a favourable conservation status of habitats and that populations of protected species are prospering (in both quality and extent/population) and have good prospects to do so in future as well.

In detail, the first two paragraphs of Article 6 of the Habitats Directive[4] require Member States to:

- "Establish the necessary conservation measures involving, if need be, appropriate management plans specifically designed for the sites or integrated into other development plans, and appropriate statutory, administrative or contractual measures which correspond to the ecological requirements of the natural habitat types in Annex I and the species in Annex II present on the sites (Article 6(1))";

[1] Schwarz, U. & Schickhofer, M. (2019): Inventory of Potential Primary and Old-Growth Forest Areas in Romania (PRIMOFARO). Mapping the largest intact forests in the temperate zone of the European Union. Report by EuroNatur Foundation.
[2] Forest Europe (2015): State of Europe's Forests 2015. https://www.foresteurope.org/docs/full-soef2015.pdf.
[3] Biris, I.-A., Veen, P. (2005) Inventory and strategy for sustainable management and protection of virgin forests in Romania. Extended English summary (PIN-MATRA / 2001 / 018). ICAS and KNNV, Bucharest, Romania: 61 pp.
[4] European Commission (2019b): The Habitats Directive in a nutshell. https://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm.

- "Take appropriate steps to avoid the deterioration of natural habitats and the habitats of species as well as the disturbance of the species for which the areas have been designated, in so far as such disturbance could be significant in relation to the objectives of this Directive (Article 6(2))."

  All plans or projects which are likely to have a significant effect on protected habitats and species shall be subject to an appropriate assessment of the implications for the site in view of the site's conservation objectives.

  The Nature Directives themselves do not explicitly refer to the need for conservation of old-growth or primary forests nor do they distinguish between natural/primary forests from secondary/production forests.

  But, old-growth and primary forests are undoubtedly representing natural habitats in a very "favourable conservation status". Thus, any significant deterioration, including logging, of primary and old-growth forests has to be considered as incompatible with the provisions of the Nature Directives.

  Romania has been focusing forest protection efforts to "virgin and quasi-virgin forests", which have been defined by Romanian ministerial orders (2525/2016) for listing with the "National Catalogue of Virgin Forests". These criteria mainly describe untouched and aged forests (ie. in the "climax" phase"), but leave all forests not meeting this discriminatory criteria (eg. developing after natural disturbances or with lower volumes of dead wood) without any effective protection. The approval of experts studies about virgin forests for consideration for inclusion within the catalogue has been very slow, left to volunteer work by NGOs or privately funded experts and hampered by draconian bureaucratic processes (including by Forest Guards and individuals in the "Technical Commission" at the Ministry of Water and Forests, CTAS). Thus, the population of the catalogue is so slow that irreplaceable natural forests are logged before they are considered for the protection they deserve under law.

  Neither the EU Natura 2000 regime nor international nature protection systems such as the World Heritage Convention or IUCN categories for protected areas restrict forest protection to "virgin and quasi-virgin" forests only. The bar in Romania is set so high, that irreplaceable natural forests that would be protected elsewhere, are lost to logging through burdensome bureaucratic technicalities.

  To wrap up, the EU's Nature Directives commit member states to maintain or restore a "favourable conservation status" of habitats and species in all Natura 2000 sites.

  A closer look at Romania's Natura 2000 sites reveals an enormous magnitude of environmental destruction in natural forest habitats.

  In presumedly all Romanian Natura 2000 sites, old-growth and primary forests are lost and under continuous pressure from logging be it, "progressive" or "conservation" cutting or "sanitary" or "salvage" logging.

  This photo documentation aims to give clear ground evidence of the environmental deterioration taking place in some of the most iconic natural forest sites in Romania.

This compilation is exemplary and thus neither comprehensive nor detailed enough to give a full picture of the loss of environmental values in Romania's forests. The logging rates are so large and logging occurs over such a vast area that it is impossible to document all alleged breaches of the EU directives (the situation, however, in other Natura 2000 sites in Romania is similar). It puts a spotlight on the following Natura 2000 sites (SCI's): Fagaras Mountains, Domogled - Valea Cernei, Nordul Gorjului de Vest, Semenic - Cheile Carasului and Retezat.

Considering the fact that primary forests have become so rare in Europe, the amount of logging of primary and old-growth forests in Romania is extremely alarming. This problem deserves intervention from the European community to help preserve some of largest areas of the EU's most outstanding forest natural heritage.

2. Photographic documentation of the status of logging and forest conservation in Romanian Natura 2000 sites

2.1. Fagaras Mountains Natura 2000 site (ROSCI0122) - Sinca and Stramba valleys

Stramba and Strambasoara valleys host large areas of extraordinary well preserved old-growth and primary beech and fir forest. In Strambasoara valley, the so called "Sinca secular forest" has been listed as a component part of the UNESCO World Heritage site *Ancient and Primeval Beech Forests of the Carpathians and Other Regions of Europe*.

However, in the buffer zone of this UNESCO World Heritage site, many of the old-growth beech forests (in a very favourable conservation status) have been severely deteriorated due to destructive logging operations and associated road construction activities.

Recent logging impacts are traceable in both the Stramba and Strambasoara valleys including in the buffer zone of Sinca primary forest UNESCO World Heritage component part.

Illegalities such as destruction of river beds by road passages and damage to standing trees are visible. Fortunately, natural forest stands outside the UNESCO site remain intact, but they lack any effective protection. (Photographs: May 2016. Coordinates: 45.662359, 25.172273)




The destruction of forest habitats in a very favourable conservation status also occurs in the neighbouring Stramba valley.

Old-growth and primary forests stands have been logged and significantly degraded despite the fact they were mapped as “virgin forests” with the 2005 Pin Matra inventory (Photographs: May and July 2016. Coordinates: 45.663666, 25.124399).

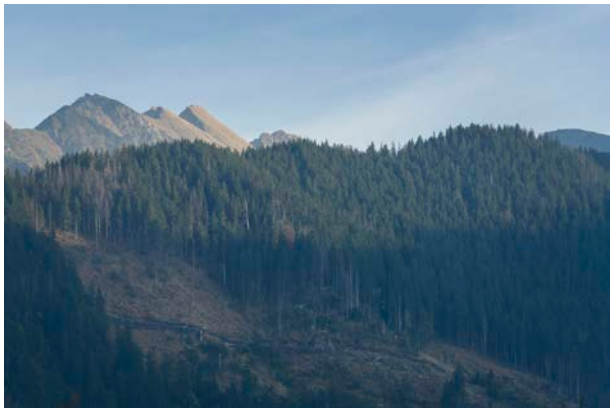

In the upper Stramba valley, substantial areas of precious old-growth and primary forests are still intact, but they are not under any effective means of protection. (Photographs: July 2016)


2.2. Fagaras Mountains Natura 2000 site (ROSCI0122) - Ucisoara valley

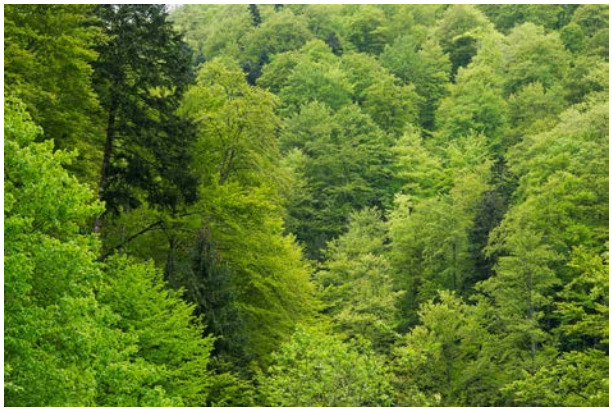
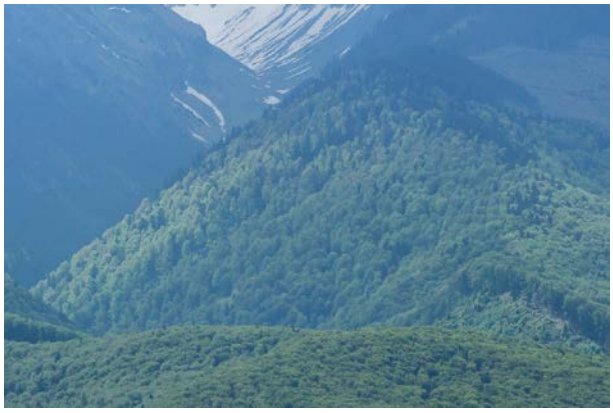
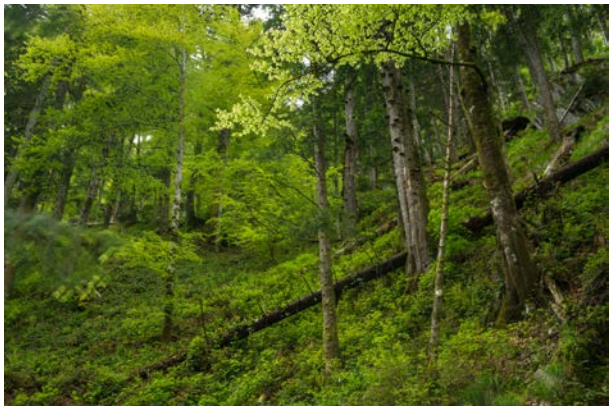
Upper Ucisoara valley is a unique pristine wilderness. Lower sections have been degraded by logging. However, some very high-biodiversity value forests remain in a favourable conservation status but lack any protection. (Photographs: July 2016. Coordinates: 45.663025, 24.723298)

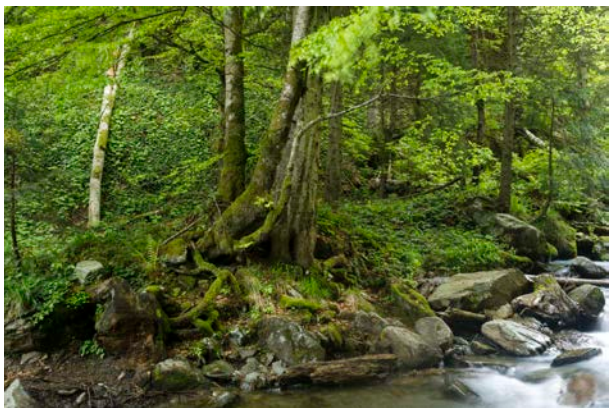






Despite the significant deterioration of natural forests in Ucisoara valley, some very valuable forest habitats remain intact, also in lower sections (see **images below**), but they have not yet been mapped and thus remain unprotected. These forests also include forests with sycamore on slopes, screes and ravines (Natura 2000 priority habitat type, code 9180). (Photographs: July 2016)

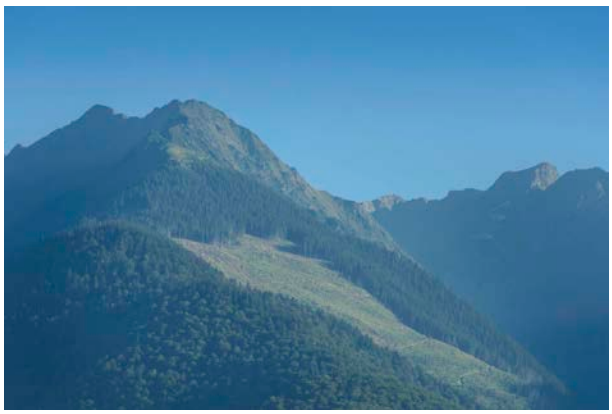




2.3. Fagaras Mountains Natura 2000 site (ROSCI0122) - Ucea Mare valley

The impressive Ucea Mare valley still hosts large areas of pathless forest and mountain wilderness, particularly in the upper valley. The primary forest is dominated by beech (with fir, ash etc.), sycamore forests of slopes, scree and ravines (Natura 2000 priority habitat type, code 9180) and natural spruce forest in the high montane and subalpine zone.

The lower section has been partly and intensively logged in the last decade. Prior to 2012, the spruce forest was largely intact with historical satellite images showing only smaller bark beetle outbreaks. However, all the spruce forest in the middle eastern slope has since been removed, officially approved as “sanitary” and “salvage” cutting (Coordinates: 45.653803, 24.710503).

The clearcut areas are vast with the largest covering almost 100 hectares. On the perimeter of the clearcuts, storms, drought and bark beetle attacks have enlarged the treeless area even further. Erosion caused by the badly built roads is intense and regeneration on the large opening is very poor. (Photographs: July and October 2016)

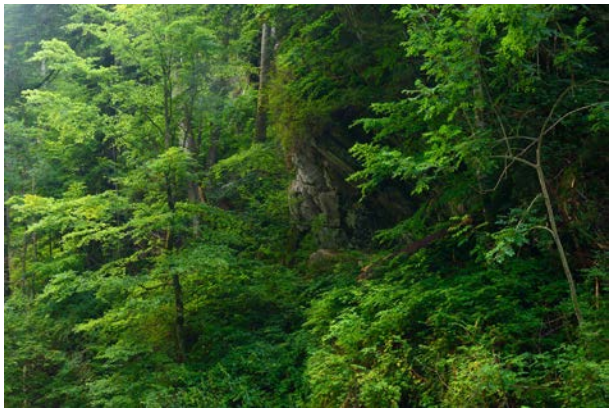



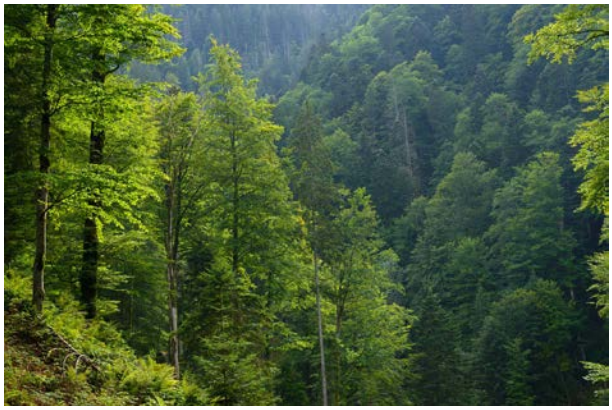





Some beech and spruce forest habitats in the lower part of Ucea Mare are intact (see **images below**), but they, too, remain, unprotected. Logging is spreading, especially on the western slope. A permanent research plot from the REMOTE scientific research project (Czech University of Life Sciences in Prague) was lost to a clear cut (native spruce forest on western slope). The forests are rich on biodiversity: accidental sightings of rare birds (such as three-towed woodpecker). (Photographs: July 2016, October 2016 and July 2018)

three-toed woodpecker (*Picoides tridactylus*)





2.4. Fagaras Mountains Natura 2000 site (ROSCI0122) - Sambata valley

This site contains large clearcuts in mountain spruce forest, partly in old-growth stands. Officially these cuts are said to be “sanitary” or “salvage” cutting. The big openings are a source of further damage to forests caused by storm, drought and subsequent bark beetle attacks.

The **images below** show a cable logging facility which leads to a large clearcut (Coordinates: 45.644583, 24.791744).

In the southern section of Sambata valley, impressive primary high montane / subalpine spruce forests with large amounts of moss are found. The (western) slopes of lower parts host stands of sycamore forests of slopes, scree and ravine (code 9180).

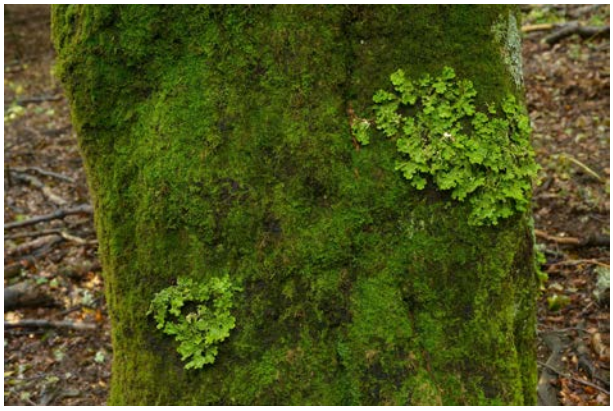
Most of the forest in Sambata valley is not protected (with the exception of a small stand of forest mapped by WWF Romania) and logging is currently taking place, in particular in spruce forest stands on the ridges. Logging has already severely affected permanent study plots of REMOTE project. (Photographs: July 2016, July 2018)

2.5. Fagaras Mountains Natura 2000 site (ROSCI0122) - Valea Cotil and Valea Curpanului

The **images below** show large clearcut in mountain spruce forest in upper Cotil valley, with clear signs of very poor forest regeneration. (Photographs: July 2017. Coordinates: 45.563759, 24.367454)


In the neighbouring Curpanului valley (see **images below**) there are large very wild primary beech forests still in a favourable conservation status. Only small parts have been mapped by a German funded research project (financed by DBU, coordinated by Forsthochschule Rottenburg) and the rest remains unprotected. (Photographs: July 2017)



2.6. Fagaras Mountains Natura 2000 site (ROSCI0122) - Arpaselu valley

Several clear cuts in natural beech and mountain spruce forests from the Arpaselu valley can be seen below.
The upper section, however, is a vast pathless wilderness, but only partly mapped and included in Romania's "National Catalogue of Virgin Forests" (the southern and southwestern slopes). However, there are more primary or only slightly degraded forests left outside the protected zone. The comprehensive protection of these primary forests and forests with only minor damage would secure the protection of a large non-intervention zone in an exceptionally wild valley. The REMOTE project has established permanent study plots in the Arpaselu Valley. They report about abundant wildlife including a high density of bears. (Photographs: July 2016)

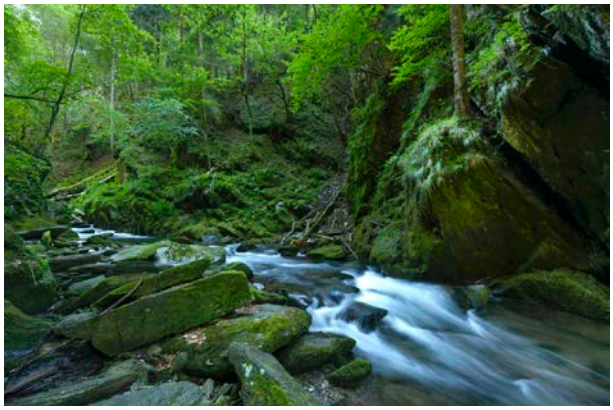
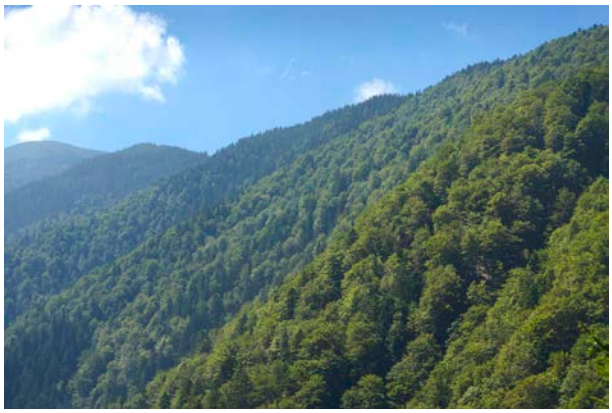
2.7. Fagaras Mountains Natura 2000 site (ROSCI0122) - Laita valley

Laita valley is probably the second wildest valley in Romania, after the pathless wilderness of Boia Mica. The steep gorge hosts at least 1000 hectares of truly wild forest: several beech forest types (with fir and ash), sycamore forests of slopes, screes and ravines and spruce forest in the higher sections (potentially partly affected by pastures or fires from several decades ago). There is no trail through the valley. Access is very difficult because of the narrow canyons, rock walls and numerous waterfalls.

To date, only forests in the the upper 50 per cent of the valley have been mapped and are under protection.
The equally wild lower half - including several stands of forests on slopes, scree and ravines (habitat code 9180) - are under immediate threat from logging. Due to the steepness of the terrain logging is conducted from the ridges using cables. (Photographs: July 2017)

Images below show the destructive impact of the construction of forest roads with strong erosion in lower Laita valley (Coordinates: 45.657571, 24.560014).


Images below show the wild lower section of Laita valley (Coordinates: 45.655336, 24.558265) with methuselah beech trees and stands of sycamore forests of slopes, screes and ravines (9180), just 200 meters below the forest road. These habitats with extraordinary conservation value undoubtedly deserve comprehensive and permanent protection.


2.8. Fagaras Mountains Natura 2000 site (ROSCI0122) - Vidraru hydro lake area

For the last 15 years many primary forest stands in the Lake Vidraru area have been destroyed by logging approved by Romsilva and the Ploiesti Forest Guard. Large scale clearcuts and intrusive and scarring logging roads have taken place in both state owned and private forests.

The evidence of irregularities presented in videos by Romanian environmental NGO Agent Green include the erratic construction of logging roads on steep slopes - involving European money – resulting in erosion, large scale cuttings, polluted streams full of silt and abandoned logs that could result in floods and land slides potentially endangering the large communist hydro complex of Lake Vidraru.

In the year 2000 the majority of forests around Vidraru were still in a primary status playing an important role in the protection of the lake. 12,230 hectares of virgin forests have been previously identified. As of today, most of the primary forests around the lake have been degraded or destroyed.

The Ministry for Water and Forests had ordered a detailed inspection in the area following a protest action by conservationists in March 2017. In June 2017, the ministry announced that they found over-cutting of around 4100%. The forest district was fined for illegally logging of 30,554 m3 timber from virgin forests in Făgăraș Mountains.

The **images below** show a former natural forest southeast of Lake Vidraru. The very brutally built road, which was financed with EU funds, leads to a skiing resort, which was constructed in a natural forest area. (Photographs: March 2017. Coordinates 45.365250, 24.672854).

2.9. Fagaras Mountains Natura 2000 site (ROSCI0122) - lower Arpasul valley

Arpasul valley is covered by more than 1000 hectares of old-growth and primary forest (mixed beech and fir forest in lower sections, spruce forest in subalpine zone). To date, the upper and western slopes of Arpasul valley have been protected (listed with the “National Catalogue of Virgin Forests”), but the eastern slopes above and upstream of the forest road are under threat of logging.

Except the vast clearcuts in subalpine spruce forests, all stands in Arpasul valley are in a good/very good conservation status (grade A). Those mixed beech forests which have been affected by logging have been only initially slightly degraded and could develop back into a natural status without intervention if further logging is stopped. The clearcuts ("sanitary"/"salvage" cuttings) on the upper slopes of the northern valley have left huge wounds on the mountains. Wind throws and bark beetle infestations have spread from these logging zones.

Arpasul valley is of outstanding wild beauty and a marked trail leads through the primary forest. This suggests that development of nature tourism could be a feasible economic alternative to resource exploitation and primary forest destruction.

The **images below** show logs from very large and old most-likely beech trees from intensive logging operations in natural forest stands above the forest road, approximately 1-2 km uphill from the road barrier where a sign indicates "conservation perimeter". (Photographs: April 2019. Coordinates: 45.677302, 24.671862)

Images below: Intact but unprotected old-growth and primary forest close to the end of the new forest road (Coordinates 45.654581, 24.673546). The forest is partly affected by some single tree extraction in the vicinity to the road (from several years ago).

The REMOTE forest research project has established some permanent primary forest study plots in the forest on the eastern slopes. However, according to local authorities and forest managers, this important scientific site and high biodiversity value forest does not qualify for protection, because they argue the few missing trees compromise the whole forest parcel and the forest does not meet legal requirements set by Ministerial Order 2525/16.

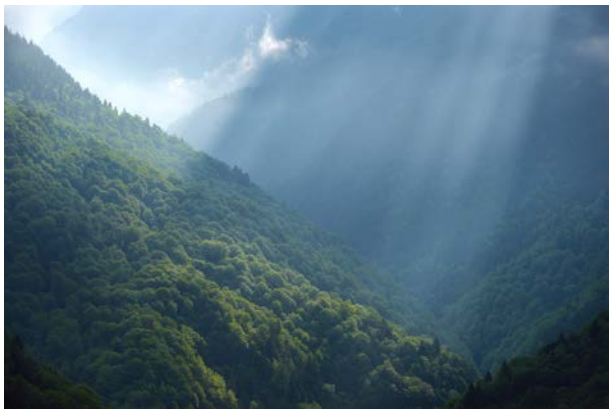
The images were taken from the marked hiking trail just above the forest road. The trail leads to the touristic lodge Cabana Turnuri. The truly wild forest experience would be highly compromised by further logging. (Photographs: April 2019, July 2018)

2.10. Fagaras Mountains Natura 2000 site (ROSCI0122) - Boia Mica valley

The highest section of Boia Mica valley is probably the wildest mountain valley of temperate Europe. It harbours approximately 1000 hectares of untouched forest. No trail leads into the steep wilderness.
The REMOTE project has been conducting research in Boia Mică and confirms that this valley is of utmost conservation value. At over 500 years of age, the oldest beech tree in Romania is found here. The REMOTE project has so far identified 15 trees older than 400 years on 14 inventory plots in Boia Mică. The plots have been selected randomly. A more systematic search would highly likely find many more methuselah trees. This valley hosts the oldest forest the REMOTE project has found in all its primeval forest research to date.
Until the 1980s, the lower parts of Boia Mica were not accessible by road. Thus, some slopes are still covered with very close to nature mixed beech forests.

Boia Mica is not protected by any regime under Romanian law. In 2016, some cutting occurred at the entrance of the pathless section (Coordinates: 45.551904, 24.398111). The cooperative owners have shown serious interest in conservation, if fair compensation is received. (Photographs: March 2017)


Images below: Impressions from the intact but unprotected part of Boia Mica. The valley is very rich in biodiversity and sightings of rare species are frequent (eg. *Osmoderma eremita*. Coordinates: 45.553647, 24.397617). (Photographs: May 2018, October 2016, July 2018)






2.11. Domogled - Valea Cernei National Park and Natura 2000 site (ROSCI0069) - Radoteasa valley

In Domogled - Valea Cernei National Park, only around 50 percent of park's forests are protected, despite the fact they are located in a national park and a Natura 2000 site. Most of the side valleys of Cerna river have been impacted by intensive logging operations, in particular in the upper Cerna catchment, where logging is prioritised over nature conservation and tourism. In the wild Radoteasa valley (Cernisoara production unit) a new forest road was recently built in 2017 and logging has already started. Unfortunately, only the most unaccessible forest stands in the upper valley are under strict protection; the rest, as confirmed by Romsilva, is being turned systematically into degraded commercial forests.

Logging has been damaging ecologically mature beech forests which are more or less identical to those natural beech stands protected within the UNESCO World Heritage site component parts (Iauna Craiove, Ciucevele Cernei) just a few kilometres away. (Photographs: November 2018, May 2018, October 2017. Coordinates: 45.205004, 22.747415)



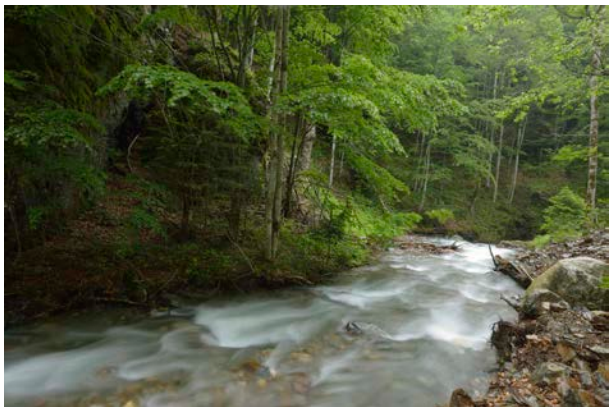
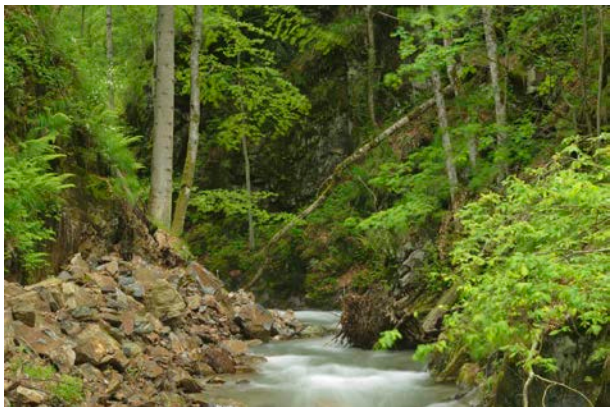




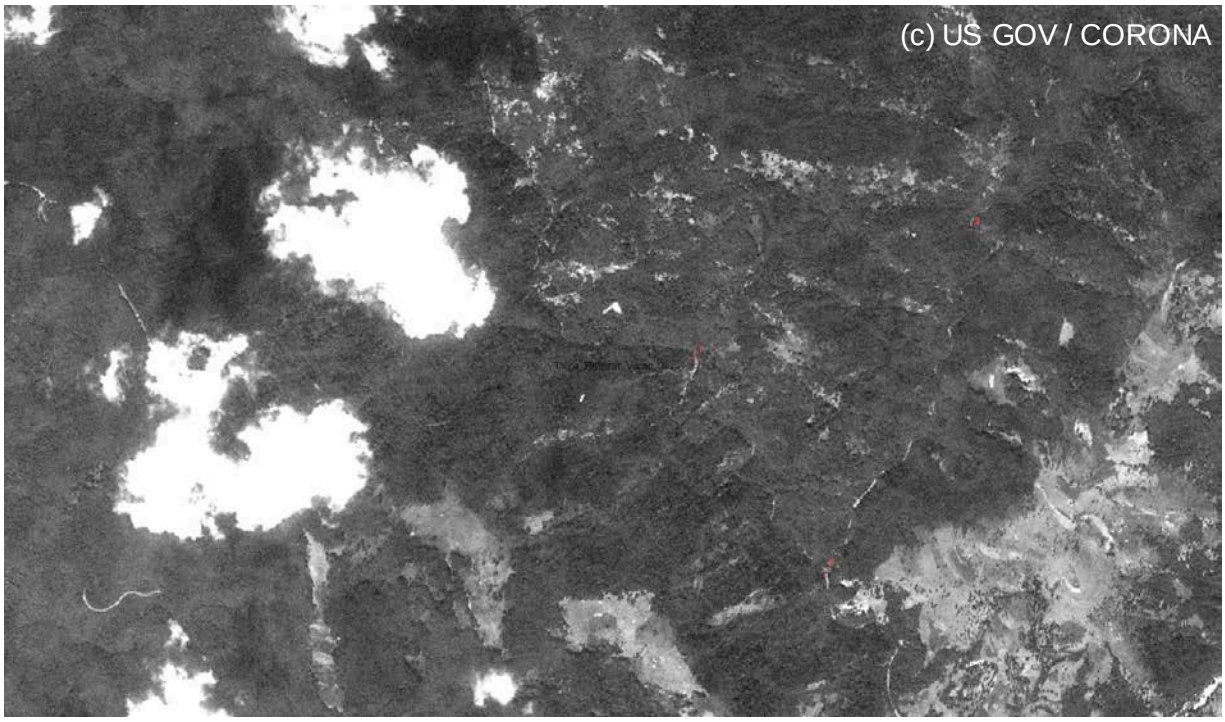





Intact old-growth / primary beech forest in Radoteasa valley (**images below)**. Approximately half of the biodiversity rich forest habitats in a very favourable conservation status in this valley are neither included in the core zone of the national park nor protected under the "National Catalogue of Virgin Forests". The situation in neighbouring Carbunele valley is similar. Instead of aligning nature protection status with Natura 2000 provisions and IUCN rules, since 2017, Romsilva has authorised several forest parcels to be auctioned for logging.

During a field visit in Domogled National Park with MEP Thomas Waitz in May 2018, Romsilva argued that the forests in Radoteasa / Carbunele valleys are not “virgin” because they do not show “enough dead wood” and because they had been partly logged in the 1950s. Consequently, they argue, the forest cannot be included in the "National Catalogue of Virgin Forests”.
However, a (declassified) satellite image (see below; source: US GOV, CORONA program) of Radoteasa / Carbunele valleys from 1968 (in the centre of the image) clearly demonstrates that the area was a large, untouched forest wilderness in the 1960s.



2.12. Domogled - Valea Cernei National Park and Natura 2000 site (ROSCI0069) - Cerna Sat area

Some of the forests above the village of Cerna Sat (the only village in the central section of the national park) have been logged heavily in the last years (Coordinates: 45.150431, 22.681736). The devastation is visually dramatic: streams have been used as roads to transport logs, trees have been damaged by passing trucks, forest soil has been compacted etc (Photographs: May 2016).






On the upper slopes, some intact, but unprotected old-growth and primary forests still remain. But logging spreads and has been degrading some of these intact forests as well (2019).


2.13. Domogled - Valea Cernei National Park and Natura 2000 site (ROSCI0069) - Ciucevele Cernei

Parts of upper Cerna valley are strictly protected as component parts of the UNESCO World Heritage site *Ancient and Primeval Beech Forests of the Carpathians and Other Regions of Europe* due to their "outstanding universal value". However, very close to the boundaries of the UNESCO site, the same type of forest is being "progressively" logged (Coordinates: 45.238135, 22.799434). Centuries-old trees have been cut down, diesel oil polluted the ground, and roads have been carved deep into the once untouched slopes. (Photographs: October 2017)

2.14. Domogled - Valea Cernei National Park and Natura 2000 site (ROSCI0069) - bordering UNESCO World Heritage component part Iauna Craiova

One of the largest and ecologically most important primary beech forests is "Iauna Craiove" forest in central Domogled - Valea Cernei National Park. Unfortunately, the reserve (which has been included in

the UNESCO World Heritage site *Ancient and Primeval Beech Forests of the Carpathians and Other Regions of Europe*) does not cover all primary beech forest in this area. As a result of this incomplete protection, high biological value beech forests continue to vanish. These forest are identical with the beech forest inside the World Heritage site. Logging occurs very close to the borders of the UNESCO site.

In May 2018, MEP Thomas Waitz visited the area and witnessed fresh cuttings in very old forest stands. He counted 400 increment rings on a large sawed down beech log. Romsilva argued that these forests are not “virgin" (according to the management plan) and thus they cannot be included in the “Virgin Forest Catalogue”. (Photographs: May 2018. Coordinates: 45.102477, 22.629625).

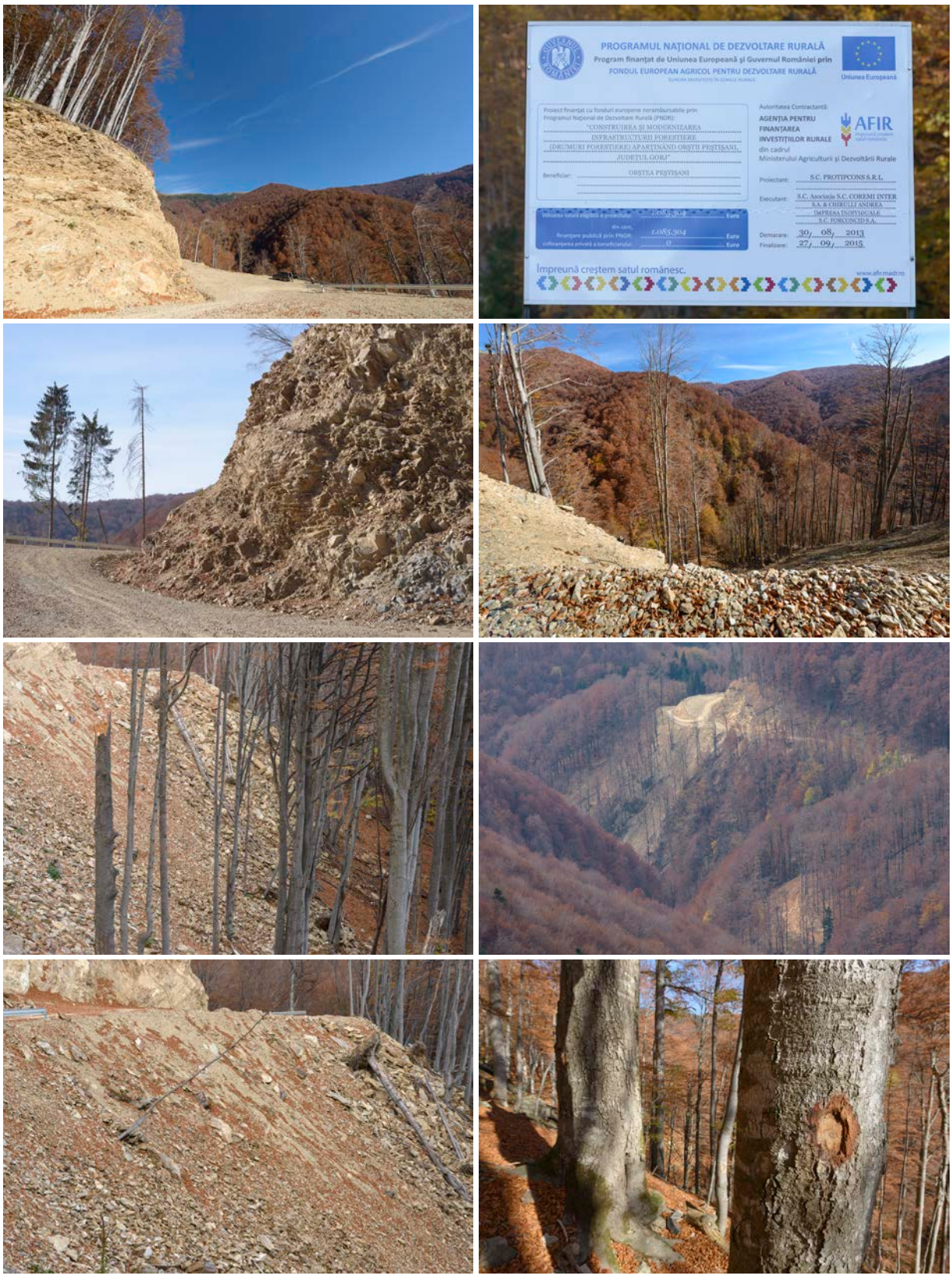
Logging very close to the boundary of “Iauna Craiova” UNESCO World Heritage component part (Coordinates: 45.102098, 22.603900 and 45.091555, 22.579430).

Logging in old-growth / primary beech forest in the eastern side valley of Iauna Craiove (45.122293, 22.635635). Apart from the deterioration of the forest in favourable conservation status, there are several illegal aspects visible: diesel oil residuals on the soil, illegal waste deposits in the forest, damage to standing trees besides the road. The intact beech forest (last image below; coordinates: 45.126277, 22.630744) has been logged in the meantime. The mighty beech trees do not exist any more. (Photographs: September 2011)

2.15. Nordul Gorjului de Vest Natura 2000 site (ROSCI0129) - Vija valley

In 2007, the remote Valcan Mountains in the southern Carpathians hosted several tens of thousands of hectares of old-growth and primary forest. The Pin Matra Study in 2005 showed that the Valcan range once was one of the country's prime hotspot of pristine forests. However, since that time, large areas have been logged even though the entire mountain range is dedicated to the Natura 2000 programme of the EU.

In Vija valley (coordinates: 45.224444, 22.994377), a remote and wild area with large surfaces of forest wilderness, a hugely destructive road was built from 2013 to 2015, financed with EU funds.
(Photographs: October 2017)



On the western slopes of Mount Arcanu (Vija valley) more than 600 hectares of old-growth / primary are still intact, except for the impacts of the forest road mentioned above. Unfortunately, only some fragments of this outstandingly large forest wilderness have been mapped to date (by WWF Romania). As of February 2020, not a single forest parcel in Valcan mountains has been included in the "National

Catalogue of Virgin Forests". The forest is very similar to that included in the UNESCO site in neighbouring Cerna valley.

2.16. Semenic - Cheile Carasului National Park / Natura 2000 site (ROSCI0226) - Toplita valley

Semenic - Cheile Carasului National Park and Natura 2000 site hosts the largest primary and old-growth beech forests in the EU - the Izvoarele Nerei reserve (5029 hectares). Most of this extremely precious forest (4677 hectares) is included in the UNESCO World Heritage site *Ancient and Primeval Beech Forests of the Carpathians and Other Regions of Europe.*

However, outside this strict reserve, in the buffer zone and some other reserves within the national park (also designated as Natura 2000 site), the natural forests have no sufficient protection and are often the victim of "conservation cuttings" (regeneration cuttings) or "progressive cuttings" (shelterwood cuts) or even clear cuts. This also affects ecologically mature stands with ancient trees and dead wood.

According to Romsilva (from a statement during an informal field visit of IUCN / attended by Luc Bas upon invitation by EuroNatur in November 2018), these forests are treated as "normal production forests" and there are no special measures applied to ensure the proper conservation of protected species or habitats (such as preservation of habitat trees for birds / bats / saproxylic beetles, deposit of dead wood or protection of old tree stands). This means that the entire old tree cover in the buffer zone of the national park will be liquidated systematically in the decades to come as approved and defined by the forest management plan. The provisions from Natura 2000 (eg. article 6, Habitats Directive) obviously do not receive any special attention or do not trigger any special conservation measures.

During the 2018 field trip, illegal forestry practices were observed: the transportation of large logs through river beds, brutally built roads creating ditches dug deeply into slopes, very old trees marked for logging. The images below show Toplita valley (Photography: November 2018. Coordinates: 45.193541, 21.964540).

"Conservation cutting" of old-growth beech forest (**see image below**) in Cheile Carasului reserve in "conservation zone" of the national park (Coordinates: 45.164411, 21.956275). The tracks of illegal river crossing from logging tractors are badly camouflaged with an improvised, hand built bridge (final image).

2.17. Semenic - Cheile Carasului National Park / Natura 2000 site (ROSCI0226) - Cosava mare valley

Outside the strict reserve "Izvoarele Nerei" but still inside the national park / Natura 2000 site, logging is omnipresent, also affecting old-growth forest with some very large beech specimens. Crude logging practices include the illegal river crossings through streams, brutally built roads and compacted forest soil. These images are from Cosava mare valley. (Photographs: May 2014. Coordinates: 45.110706, 22.024662).

2.18. Retezat National Park and Natura 2000 site (ROSCI0217)

Also in the Retezat Natura 2000 site (this includes Romania's oldest national park) logging has been significantly deteriorating old-growth and primary forests. Example: The roadless and pathless Riul Ses valley. (Photographs: September 2011. Coordinates: 45.293224, 22.650033)


Severely degraded old-growth beech forest in the area of Campusel in upper Jiu valley, a former property of Schweighofer Holzindustrie (Coordinates: 45.256486, 22.856597).
The last picture shows road 66a in the upper Jiu valley, which was built without prior environmental impact assessment. The road interrupts migration routes of animals such as bears, wolves and lynxes. (Photographs: May 2014)