



# Failing our Last Great Forests

**The systemic failure of the “National Catalogue of Virgin and Quasi-virgin Forests” of Romania**



*Image 1: Arpas Valley, Fagaras Mountains: only partially in the National Catalogue (the top part) ©Agent Green*

**Report by Agent Green and EuroNatur**

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## 1. Background: Romania’s old growth and primary forests and their protection

Romania hosts the largest remaining tracts of old growth and primary forests within the temperate climate zone of the European Union. The degree of naturalness of Romania’s forests remains exceptionally high in comparison to the rest of Europe, where such forests have mostly disappeared. Only in the far north of the European continent - in Scandinavia and Russia - are larger areas of natural, unmanaged forests found. According to Forest Europe less than 4% of the forests within the EU are in a status more or less “undisturbed by man” (Forest Europe 2015)<sup>1</sup>.

In 2005, the *Pin Matra* inventory<sup>2</sup> of Romania’s forests revealed more than 210,000 hectares of “virgin forests”, following a very strict definition of the term. In 2017, a Greenpeace study identified 300,000 ha of potential primary forests<sup>3</sup>. In 2019, the *PRIMOFARO* study<sup>4</sup> identified over 500,000 hectares of potential primary and old-growth forest in Romania. These last intact high biodiversity value forests are of outstanding ecological and scientific value.

Already back in 1999, the Romanian National Sustainable Development Strategy called for protection of this highly valuable forest treasure: “Conservation of biodiversity and ensuring the stability, health and multi-functionality of forests by protecting, by specific means, about 400,000 ha of virgin and quasi-virgin natural forests existing in the Romanian Carpathians.”<sup>5</sup>

The Forest Code and the Protected Areas Law (OUG 57/2007) clearly states that all virgin and the quasi-virgin forests and the most valuable natural values have to be designated and included in scientific reserves. To date, this has not happened.

In 2012, following a public community campaign by WWF, the Romanian government announced a programme to identify and protect the remaining “virgin and quasi-virgin” (primary and old growth) forests. This included the prohibition of logging in intact virgin and quasi-virgin forests identified in the 2005 *Pin Matra* inventory. Tragically, this logging moratorium was not implemented and Romanian authorities allowed the ongoing logging of high ecological value forests to continue. There are two main reasons for the ineffectiveness of this ministerial order:

<sup>1</sup> Forest Europe (2015): State of Europe’s Forests 2015. <https://www.foresteurope.org/docs/full-soef2015.pdf>.

<sup>2</sup> Biriş I. & Veen P. (ed.) (2005): Inventory and strategy for sustainable management and protection of virgin forests in Romania. (PIN-MATRA/2001/018). ICAS and KNNV. Web source datasets digital maps: Pădurile virgine din România. Report and maps. <http://www.mmediu.ro/articol/proiect-pin-matra-padurile-virgine-din-romania/2068>.

<sup>3</sup> Greenpeace CEE Romania (2017): Potential primary forests map of Romania. <https://maps.green-peace.org/project/potential-primary-forests-map-of-romania/>.

<sup>4</sup> Schwarz, U. and Schickhofer, M. (2019). PRIMOFARO. Inventory of Potential Primary and Old-Growth Forest Areas in Romania. Report for EuroNatur.

<sup>5</sup> Giurgiu, V. Doniță, N. Bândiu, C. Radu, S. Cenușă, R. Dissescu, R. Stoiculescu, C. Biriş, I.A. (2001). “Pădurile virgine din România,” asbl Forêt wallone, ISBN: 2-9600251-1-1, page 38

1. Logging could happen with permission from the Forest Guard in cases where the polygons were deemed to not meet the criteria of virgin forests. Most polygons were disqualified by the Forest Guards up front and logging was permitted
2. No sanctions were stipulated for logging in these polygons where logging permissions had not been granted.

Four years later, in July 2016, the legal terms and implementation conditions of the so-called “National Catalogue of Virgin and Quasi-Virgin Forests” were published by Romania’s Ministry for Environment. The aim of this unique tool was to identify and protect the remaining “virgin and quasi-virgin” forests of Romania.

**Almost five years later, as of March 2020, this National Catalogue contains only 30,062 hectares, a tiny fraction of the intact primary forests that remain in Romania.<sup>6</sup>**

At the beginning of the mapping process the Romanian authorities sought the assistance of NGOs, universities, scientists and other interested parties to help populate the Catalogue. Scientific studies were to be produced by forestry experts for virgin or quasi-virgin forests to qualify for the National Catalogue.

The National Catalogue is limited to strictly defined “virgin and quasi-virgin forests”. Forest experts have criticised the scientific accuracy of these criteria<sup>7</sup> because they describe a climax phase of natural forest development with large volumes of dead wood and large numbers of tall and old trees. The criteria defined by the Ministerial Order require (among other strict limitations) “the frequent presence of dead wood, standing and on the ground, in different decay classes”. Primary forests in different age classes are excluded from protection.

Other close-to-nature forests with high biodiversity value, such as long untouched and old-growth forests, are not accepted and thus fail to qualify for protection. This means that provisions of the EU’s Nature Directives (eg. Article 6 from Habitats Directive) are not implemented properly in Romania.

Several experts involved with the development of studies for the National Catalogue have reported high rejection rates of studies and that bureaucratic processes have impeded rather than facilitated due process within both the Romanian ministry and some Forest Guards. This explains the very poor approval rate within this primary forest protection programme.

This report evaluates the status of the studies which have been submitted to Romanian authorities including Forest Guards, the Ministry for Water and Forests and the Ministry for Environment for inclusion in the “National Catalogue of Virgin and Quasi-Virgin Forests”.

The data presented in this report has not been made publicly available before.

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<sup>6</sup> <http://apepaduri.gov.ro/paduri-virgine/>

<sup>7</sup> Biris I.-A. (2017): Status of Romania’s Primary Forests. For Greenpeace Romania. Bucharest. <https://storage.googleapis.com/planet4-romania-stateless/2019/07/dd70c748-dd70c748-the-status-of-romania-s-primary-forests.pdf>.

## 2. Studies submitted to the National Catalogue of Virgin and Quasi-Virgin Forests

In order to analyse the gap between studies submitted to the Catalogue and studies actually accepted, Agent Green sent public requests for information to all the regional Forest Guards and to the Ministry of the Environment in the beginning of 2019. These requests sought information on the number of studies submitted nationwide and the status of each of these studies.

The answers to the requests for information revealed some rather worrying facts:

- A total area of **30,335.96 hectares** was submitted in studies covering approximately 132 forest areas.
- **24,260.54 hectares** of the total studies submitted were either rejected, lost or blocked by the authorities in various stages. This represents 80% of all the studies submitted.
- Only **6,075.42 hectares** of studies submitted were approved and accepted.

These 6,075.42 hectares were listed in the National Catalogue and together with another 23,986.64 hectares that were approved through new Forestry Management Plans make up the current total figure of 30,062.06 hectares in the Catalogue.<sup>8</sup>

It is important to recognise that the majority of forests in the National Catalogue have been introduced via new Forestry Management plans. These forests do not require any individual studies to be made and are introduced by foresters every ten years when management plans have to be renewed. However, the selection process and the decision to include forests through management plans is strictly the responsibility of local foresters. The general public is rarely consulted and these forests are often located in remote locations and are often of little commercial interest.

The total area of the current Catalogue of 30,062.06 hectares is not to be confused with the total area of studies submitted of 30,335.96 hectares.

The most striking findings are that 8,890.76 hectares of forests were outright rejected, 10,543.78 hectares were sent back to experts and studies covering 4,056.22 hectares of high nature value forests were simply lost. It must be noted that scientists have undertaken profound research over long periods of time, often working in difficult remote locations at substantial cost, to submit their work for approval. That their studies have been lost by Romanian officials is contemptuous of their profession.

These findings raise crucial questions about a system that is clearly hampering attempts to constructively engage in this important conservation program for the protection of many of the EU's most valuable natural forests.

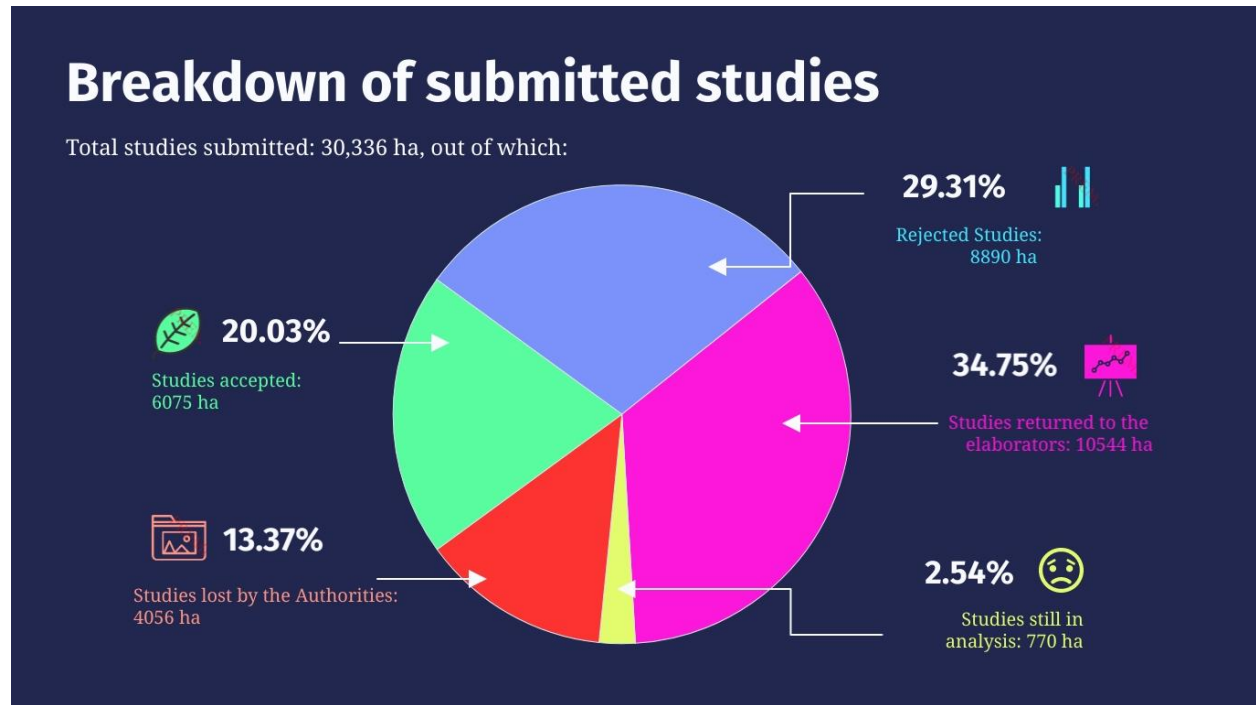
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<sup>8</sup> <http://apepaduri.gov.ro/paduri-virgine/>

The findings of our analysis are summarised below:

	Surface in hectares	Referring to Individual forest areas	Number of Studies	Percentage
<b>Total studies submitted</b>	30,335.96	132	93	100 %
<b>Total areas rejected</b>	8,890.76	40 (approx.)	11	29.31 %
<b>Studies sent back for elaboration</b>	10,543.78	44	39	34.75 %
<b>Studies still being analysed</b>	769.78	4	4	2.54 %
<b>Studies lost by Guards or Ministry</b>	4,056.22	17	17	13.37 %
<b>Studies accepted in the National Catalogue</b>	6,075.42	27	22	20.03 %





### 3. Romania's Ministry of Environment - incompetence or deliberate mismanagement?

The Ministry for Environment replied to Agent Green's official request for information on February 12, 2020. In its correspondence, the Ministry confirmed that 42 forest areas, totaling 9,382.70 hectares have been either rejected or are still being analysed.

However, the Forest Guards answered the same request for information with a list of 105 forest areas, covering 24,260.54 hectares. In other words, Romania's Forest Guards are aware of 63 more forest areas than the Ministry which have been rejected or are still in analysis. See the details below:

<b><i>Replies by different authorities</i></b>	<b><i>Total areas declared outstanding</i></b>	<b><i>Forests either in analysis, sent back to elaborators with further requests or missing</i></b>	<b><i>Forests rejected</i></b>	<b><i>Total Forest</i></b>
<i>Regional Forest Guards</i>	<i>24,260.54 ha</i>	<i>15,369.78 ha</i>	<i>8890.76 ha</i>	<i>105 forests</i>
<i>Ministry of Environment</i>	<i>9,382.70 ha</i>	<i>4,611.16 ha</i>	<i>4,771.54 ha</i>	<i>42 forests</i>
<i>Inconsistencies: missing from the Ministry list</i>	<i>14,877.84 ha</i>	<i>10,758.62 ha</i>	<i>4,119.22 ha</i>	<i>63 forests</i>

The Ministry of Environment has a special department dealing with virgin forests and a specially appointed coordinator for the National Catalogue.

Despite this, they are obviously not aware of 14,877 hectares of forests that have been submitted to the Forest Guards. All of these studies should have been submitted to the Ministry by the Forest.

It remains completely unclear why these studies have disappeared from the Ministry's list.

A large number of studies covering 4,056.22 hectares had been confirmed to experts in correspondence with officials as being in analysis at the Ministry, including as far back as 2016, but they have since disappeared from the official list.

And even one forest, Coltii Balei, was approved for the National Catalogue back in 2017, but has since disappear from the official Ministerial records.

It is difficult to interpret these findings in any other way except that the approval process for the “National Catalogue of Virgin and Quasi-Virgin forests” has been grossly unprofessional and abjectly mismanaged. Temperate Europe's last large tracts of primary and old growth forests deserve the highest level of protection and caution. Time is of the essence for their survival, yet bureaucratic hurdles and severe mismanagement reveal a systemic lack of both care and seriousness regarding the protection of Romania's unique forest heritage. The responsible officials have clearly failed in their roles to protect forests within the Catalogue.





Image 2: A forest in Moldova listed by the Forest Guard as sent to the Ministry, but missing from the Ministry list  
©Agent Green

#### 4. Study of Europe's wildest virgin forest valley: rejected or not?

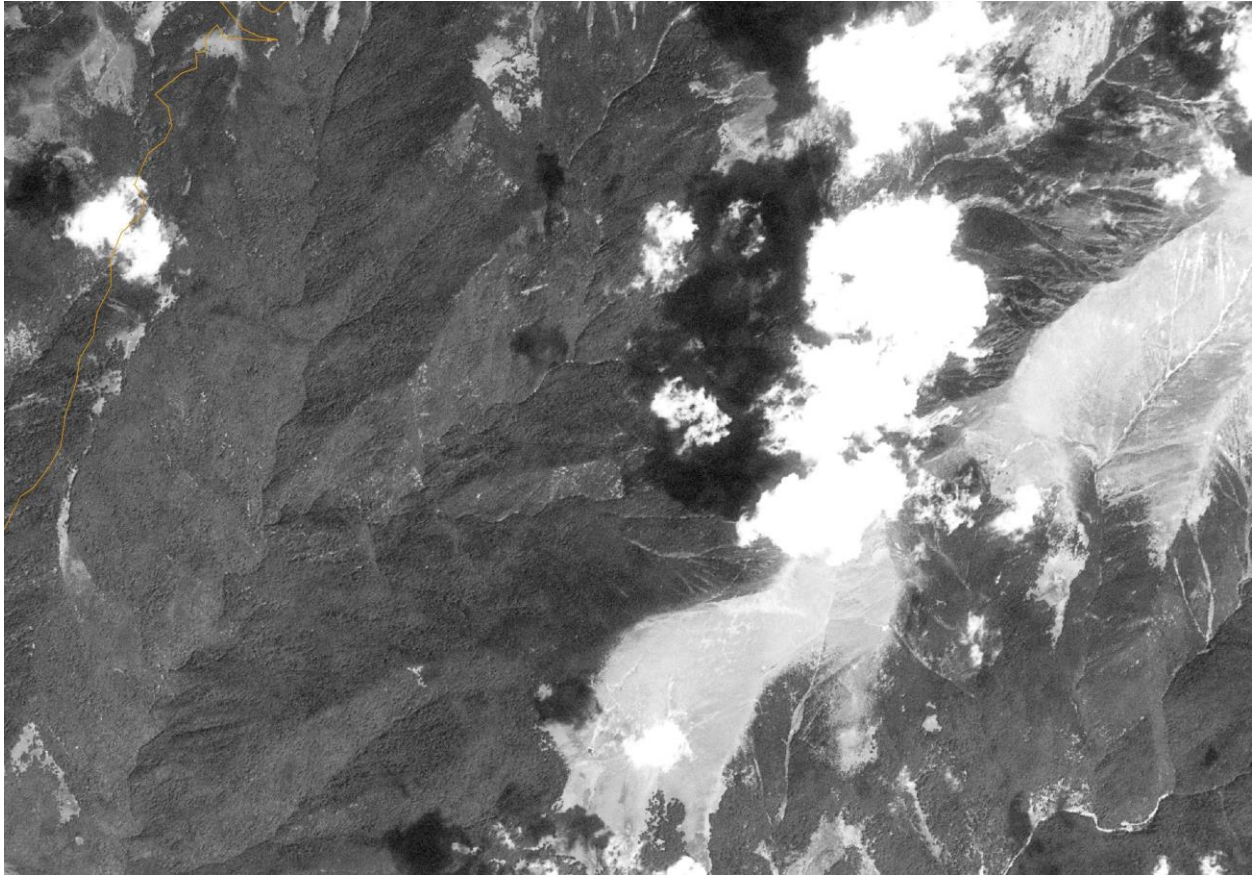
Four studies on the Ministry lists are noted as “Rejected by Valcea Forest Guard”, including the study of the extremely unique virgin forests in Boia Mica valley in the Fagaras mountains. This is probably the wildest mountain valley in Romania and quite likely in the entire temperate zone of EU.

Boia Mica has been researched by international scientists<sup>9</sup> who recorded some of Romania's oldest forest stands there. Scientists from several countries agree that Boia Mica is one of the prime wilderness heritage sites in Europe. It is included in a Natura 2000 site, but still lacks any effective protection.

Interestingly, the Valcea Forest Guard have since confirmed that the study for Boia Mica is still in analysis. No notice of rejection has been received by the study's authors.

This confusing case - where the Ministry and Forest Guard communicated clearly conflicting information - underpins the critical question about the quality of public administration and the level of professionalism at the Ministry for Environment in the fulfilment of their duties, as made clear by Romanian law. The case of Boia Mica raises serious doubts as to the intention of the Romanian government's commitment to protection of Romania's most important forests at all.

<sup>9</sup> <https://www.remoteforests.org/>



*Image 3: Satellite image of Boia Mică valley in 1969 showing roadless wilderness, without any signs of human activities. Nevertheless, the Forest Guard of Valcea argued that these forests were partly logged in the past and thus are not “virgin forests”. (Image source: USGS / CORONA programme) ©Agent Green*

## 5. Extremely slow progress of approval process

On average, only 1,500 hectares of virgin forests have been accepted through expert studies per year. This adds up to a total area of just over 6,000 hectares in 4 years.

The reason for the slow progress seems to be a combination of poor training, inexperienced staff and a direct conflict of interests.

Most Forest Guards have not been trained in forest ecology including the detailed process of how to identify a virgin or old-growth forest. The Forest Guard and the Ministry are actively rejecting potential virgin forests based solely on the information provided in the forest management plans.

These plans often are not based on sound scientific research and ecological rigour but on the estimations of foresters. Often, they include inaccurate figures and misleading estimations regarding the average age of forest parcels.



If forest parcels do not meet the criteria for the National Catalogue in terms of (minimum) size, age or structure then the studies are quickly rejected on paper by the Forest Guard office without validating the actual forests in the field.

This has been occurring frequently despite the fact that the authors of these studies are scientists with appropriate academic education. The scientists have vastly greater experience than either the developers of the forest management plans and many of the inspectors of the Forest Guards.

In 2019, at the public consultation for the auction of studies started by the Ministry for the identification of virgin forests, a list of 708 forest parcels (with a total surface of approximately 8,470 hectares) was sent by NGOs (which didn't have resources to make these studies themselves) to the Ministry and Forest Guard Valcea to be checked for their qualification as virgin or quasi-virgin forests. The Ministry passed these parcels to the Forest Guard for verification. All these parcels were rejected by the Forest Guard on the grounds that they did not contain a sufficient mean forest age from the forest management plans or that they did contain not enough biodiversity because they were of pure beech composition. This was a huge abuse, disqualifying forests on a criterion for which they were not competent to determine. The forests were most likely never visited by the Forest Guards, nor checked by experts in the field.

In another example, from 2016 to 2019, between 2,000 and 3,000 hectares in the Tarcu Mountains were signaled to the authorities by NGOs. These forests, which were verified in the documents and in the field, were confirmed by the Forest Guard Timisoara. However, because the current legislation does not allow for forests to be included in the National Catalogue without a study, these parcels were simply posted on the Forest Guard website awaiting studies by NGOs and other entities. If no-one shows an interest in elaborating studies for these forests, then they will remain outside of the National Catalogue.

So, between 2016 and 2020 the Ministry has not been at all responsible for submitting evidence for the Catalogue inclusion - this has been left to NGOs, external scientists and to some extent, foresters responsible for forest management plans. The Ministry could have verified nationwide all forest parcels with the age over 110 years for the Catalogue, but chose not to.

## 6. Potential conflict of Interests

The CTAS (Technical Commission for Approvals in Forestry) is the final authority at the Ministry of the Environment for the approval of studies for the Catalogue. However, this commission does not consult with any forest ecologists, biologists, environmentalists or scientists. It is constituted entirely of foresters. The level of expert knowledge in this body about the independent identification of “virgin and quasi-virgin” forests is questionable at the very least, and a clear conflict of interest at worst.

The members of this commission are the same people who are tasked with the approval of logging plans within forest management plans including in national and natural parks, natural reserves, Pin Matra mapped forest stands and in Natura 2000 sites.

In order to approve the study of a virgin or quasi-virgin forest, CTAS foresters have to admit that their earlier approval of a forest management plan and the associated logging schemes was wrong.

Ironically, it is the same people that initially approved logging in virgin and quasi-virgin forests, who are now being asked to approve the conservation of these forests.

This is a clear conflict of interest as each study that contradicts a forest management plan is seen by this commission as invalidating the approvals initially given by them.



Image 4: Over 1000 hectares of intact primary forests in Boia Mica valley, Fagaras Mountains ©Agent Green

## 7. Summary by Forest Guard regions

The table below shows that, with the exception of Ploiesti Forest Guard, all the regional Forest Guards in Romania have very low approval rates for virgin forest studies.

Incredibly, the two regional Forest Guards of Focsani and Suceava do not have any forests in the Catalogue, despite having studies covering 7,700 hectares submitted to their offices. Other Forest Guards such as Brasov and Cluj have only managed to approve 1 study each since 2016.

This is not necessarily the failure of the Forestry Guards as many of the studies had been approved by Forest Guards initially and sent to the Ministry of the Environment for inclusion in the Catalogue. However, at the Ministry most of these studies have been rejected, blocked, returned or lost.

Forest Guard name	Forests submitted (ha)	Forests approved (ha)	No of studies approved	Approval rate
GF Focșani	2428.44 ha	0 ha	0	0 %
GF Suceava	5312.53 ha	0 ha	0	0 %
GF Brașov	706 ha	57.20 ha	1	8.1 %
GF Timișoara	11761.45 ha	2142.54 ha	13	18.22 %
GF Cluj	1248 ha	380.59 ha	1	30.5 %
GF Valcea	7755.25 ha	2699.63 ha	5	34.81 %
GF Ploiesti	1127.29 ha	795.46 ha	2	70.56 %

## 8. Conclusions

The *National Catalogue of Virgin and Quasi-Virgin Forests* was meant to showcase Romania's commitment to protecting its outstanding primary forest heritage. Instead, it has become an example of national failure and a missed chance - similar to the Pin Matra virgin forest inventory in 2005 which was neglected by several governments and authorities.

Even if the forests from the missing and rejected expert studies are added to the Catalogue, it would contain only around 54,000 hectares - still, way below its true potential. Instead, after almost five years, the Catalogue holds a mere 30,000 hectares of forests. Over 24,000 hectares have been blocked from being listed, including almost 9,000 hectares that have already been rejected.

The majority of forests in the Catalogue are currently those introduced automatically by foresters in new forest management plans, while the majority (80%) of studies proposed by scientists, NGOs and universities have been rejected.

The rejected studies include contributions by a project funded by the German Federal Environmental Foundation (Deutsche Bundesstiftung Umwelt - DBU) and coordinated by German Hochschule für Forstwirtschaft Rottenburg and the REMOTE project, which is the largest and most comprehensive

primary forest research project in Europe, led by the Czech University for Life Sciences in Prague. Researchers have been kept busy in repetitive bureaucratic procedures. Sophisticated and robust science based studies were rejected by officials, resulting in a substantial loss of financial resources donated to Romania gratefully by German and Czech entities.

Only 6,075 hectares have been approved through the expert studies. This shows a severe lack of will of Romanian state bodies to implement the legal provisions from its own forest protection legislation and from the EU's Natura 2000 directives.

Impediments to the implementation of the Catalogue could indicate that this instrument was designed from the start to be kind of a diversion for logging interests. The complicated and time consuming procedures meant that NGOs and scientists were kept busy with paperwork and expended massive budgets in the process. **Scandalously, the low level of approvals of forests for protection has allowed massive logging in old growth and primary forests in the meantime.**

A national forest protection instrument designed to slow its own implementation in order for forests to be logged in the in the meantime? At best, the poor results of the National Catalogue thus far certainly demonstrate a lacklustre level of ambition within Romanian state institutions to ensure the comprehensive protection of some of Europe's most precious natural forests.

Furthermore, also potentially false and incomplete information has been communicated by the Ministry of Environment: a large number of studies have been recorded and confirmed in correspondence with the Ministry since 2016. Surprisingly, 63 studies representing 14,877 hectares of forest have since disappeared from the official list.

The level of chaos and mismanagement is unacceptable. Some studies had been previously approved and have gone missing since. Others are mentioned as rejected by the Ministry, whilst the Forest Guards are still analysing them.

There are significant conflicts of interests at the Technical Commission for Approvals in Forestry in the Ministry of Environment (CTAS). Commission members who are ultimately responsible for approving the Catalogue listing are also responsible for forest management plans where logging approvals are given logging, including in primary and old growth forests and in protected areas such as national parks and Natura 2000 sites. Thus, it is highly questionable whether this is the appropriate body to independently assess and decide forest conservation outcomes.

The legally defined criteria for identification of forests in the mapping process are strict and not entirely based on sound science, because they only accept aged climax forests with “high frequency of dead wood” for inclusion to the National Catalogue. Forests dominated by other forest development phases can be easily rejected - and approved for logging. Another common problem is that unscientific data from forest management plans (such as age estimations only based upon tree dimensions) has been given superiority about scientific data from field research.



The high rejection rate of studies demonstrates that the impediments have been “designed into” the process to slow down and limit National Catalogue approvals. As a consequence, many extremely valuable primary forests did not make it in the National Catalogue and have been now approved for logging.

Ironically, the National Catalogue obviously has been used actively as a tool against the conservation of large areas of primary forests in Romania - effectively it excludes rather than includes some of the most important forests left in Europe. The non-introduction of thousands of hectares in the Catalogue is justification to allow for their logging. So what started as a noble idea has since been commandeered by other, non-conservation interests.

These findings clearly show that the National Catalogue of Virgin and Quasi-virgin Forests is not fit for the purpose of conserving the majority of primary and old-growth forests in Romania.



*Image 5: Large clear cuts in former primary and old growth forests. Ucea valley, Fagaras Mountains ©Agent Green*

## 9. Summary and Recommendations

### Key findings:

1. A very large number of studies have been submitted for inclusion into the National Catalogue since 2016, covering an area of 30,336 hectares.
2. 80% of the forest areas submitted did not make it to the National Catalogue: they were either rejected, sent back to the study authors, lost or are still in analysis.
3. The Ministry of Environment issued information that is vastly different and incomplete compared to the information issued by the Forest Guards: there is a discrepancy of 14,877 hectares.
4. Some of the information provided by the Ministry is potentially false and in direct contradiction to that of the Forest Guards: studies declared as rejected are apparently still in analysis.
5. Some Forest Guards have not approved any studies at all in the last 5 years.

6. There is a potential conflict of interest at the Ministry, especially in the Technical Commission for Approvals in Forestry (CTAS), an agency that also approves all logging plans.

The present “virgin forest only” approach in Romania leaves large forest areas of very high conservation value without any effective protection. This leads to logging and the ongoing deterioration of huge forest areas which should be protected, in particular under the EU’s Natura 2000 regime.

Thus, comprehensive protection of all remaining old growth and primary forests in Romania is overdue. The previous focus on protection of “virgin” forests does not sufficiently meet the needs deriving from international conventions and legislation: neither the EU’s Natura 2000 Directives nor the Convention on Biological Diversity (CBD) restrict the need of forest conservation only to narrowly defined “virgin forests”.

**Therefore, Agent Green and EuroNatur urge the Romanian Government to immediately act to protect Romania’s primary and old-growth forests through the following measures:**

- All rejected, blocked and missing expert studies for the National Catalogue of Virgin and Quasi-virgin forests have to be reassessed by independent forest ecology and biology experts. These experts should be nominated in partnership with key environmental organisations. The expertise of independent scientists who have been involved in mapping of primary forests in Romania so far - such as University Prague (REMOTE), University Oradea or Hochschule für Forstwirtschaft Rottenburg - has to be taken into account.
- Logging in all forests covered by pending studies (rejected, missing, blocked) has to be stopped and a moratorium applied until the further protection status of the forests is clarified.
- The ministerial commission CTAS has to be withdrawn from assessing and approving forests for the National Catalogue of Virgin and Quasi-virgin Forests. A new scientific council needs to be established involving also forest ecology experts and biologists. This body has to work with full transparency. NGOs and civil society should be involved in the process and have access to meetings, consultation processes and documents.
- The criteria for the National Catalogue of Virgin and Quasi-virgin Forests need to be adapted to sound science. The revised criteria have to also include all stages of forest development. The criteria should correspond with the widely accepted classification system for primary forests of Erik Buchwald, which also includes old growth forests.
- Criteria also need to correspond with the provisions from Natura 2000 and ensure comprehensive protection of natural forest habitats in a good conservation status. Biodiversity and the conservation status of habitats and species should be considered as key aspects.
- All submitted (incl. all approved) expert studies for the National Catalogue of Virgin and Quasi-virgin Forests have to be made publicly available and publicly published in a digital version.

- The reasons for rejections of expert studies about primary forests by the CTAS have to be made available for the public as well. The right of response should be made available to address any identified issues and re-submissions accepted.
- All potential old-growth and primary forests on Romanian state property need to be assessed by the expert group mentioned above and turned into non-intervention zones. The potential locations of these forests has been identified by the PRIMOFARO inventory.<sup>10</sup> This study needs further validation by GIS data and orthophoto analyses as well as field checks. This needs to happen quickly to prevent further degradation by logging. Therefore, a moratorium for logging of potential old-growth and primary forest on state property must be applied by the Romanian government.
- Private owners of old growth and primary forests need to be offered compensation for loss of income as a result of non-intervention management of their forests. This should be supported by public funding including EU funds.
- Logging plans for old-growth and primary forests in approved forest management plans need to be annulled and forest management plans need to be adopted accordingly.
- Old-growth and primary forests outside existing Natura 2000 sites should be included in new or enlarged Natura 2000 sites in Romania.

The PRIMOFARO inventory identified 332,844 hectares (63%) of potential old-growth and primary forests in Natura 2000 sites, including 83,937 hectares located within national parks.

These forests need to be - as much as possible - protected comprehensively, applying a non-intervention approach and very extensive, close to nature forest management, only to serve immediate subsistence needs of local population.

In order to meet the obligations from the Convention on Biological Diversity and to align with upcoming EU wide conservation schemes of strict protection of 10 % of the EU's terrestrial and marine ecosystems (see discussions for the new EU Biodiversity Strategy) Romania should consider at least 8% of the forest cover (as identified by PRIMOFARO study) for comprehensive and long-term preservation. EU funds should be provided and used to support the implementation of such a goal.

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<sup>10</sup> [https://www.saveparadiseforests.eu/wp-content/uploads/2019/10/PRIMOFARO\\_24092019\\_layouted.pdf](https://www.saveparadiseforests.eu/wp-content/uploads/2019/10/PRIMOFARO_24092019_layouted.pdf)

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