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European Commissioner
Environment, Water Resilience
and a competitive Circular Economy
European Commission
Rue de la Loi 200, 1049 Brussels

September 2025

RE: Uphold the EUDR to keep Romania's forests standing

Dear Commissioner Roswall,

The EU is facing alarming forest habitat degradation with 85% of monitored forest habitats in unfavourable conservation status according to the European Environment Agency.¹ **The unabated logging of Eastern Europe's and in particular Romania's remaining primary, old-growth and naturally regenerating forests, often illegal, is threatening people's livelihoods, natural ecosystems and forestry's economic viability.**

In response to the call for evidence on the simplification package, we have submitted recent evidence from Romania with a focus on: 1) Romania's large share of primary and old-growth forests and their lack of suitable legal protection; 2) Romania's track record of illegal wood logging and related forest degradation, including the EU infringement cases on EUTR and the Nature Directives; and 3) Loopholes in national legislation and in the SUMAL timber traceability system. **On this basis, we argue that Romania is a country which exhibits a considerable - not negligible - risk of illegal wood logging, and therefore we call for a consistent, complete and timely implementation of the EUDR.**

Romania is home to much of Europe's high biodiversity value forests, including primary, old-growth and naturally regenerating forests, only a tiny fraction of which are currently under strict protection. While mapping is conducted for the implementation of strict protection in line with the EU biodiversity strategy 2030, the very forests being mapped are being degraded — with massive impacts on nature and climate. From the estimated 525,632 ha of potential primary and old-growth forests identified by the Primofaro inventory (2019), logging has affected 138,000 hectares of forest parcels containing at least 5% of Primofaro overlap. 71,000 ha of these affected parcels are located inside Natura 2000 protected areas.²

Romania is a country with a track record of illegal logging and related degradation of forest ecosystems. The EU infringement procedures which started in 2020 against Romania, concerning illegal logging in breach of the EUTR and the destruction of habitats in Natura 2000 protected areas in breach of the Habitats Directive, have confirmed *inter alia* that Romanian authorities have not been able to check large amounts of illegally harvested timber. Important loopholes in legislation and weaknesses in the SUMAL timber traceability system remain,

¹ https://forest.eea.europa.eu/data/visualizations/conservation_status_forest_habitat_eu28

² <https://www.agentgreen.ro/wp-content/uploads/2024/11/REPORT-Massive-Logging-in-PFOGF-in-Romania-2021-2024-1.pdf>

making illegal timber logging and transports go undetected.³ **Investigations conducted by Agent Green over the past two years have detected illegal logging with breaches of EU and national laws across Romania. Detected illegalities include:** 1) logging in Natura 2000 protected areas without environmental assessments in breach of the Habitats Directive or the SEA Directive; 2) improper/incorrect implementation of logging practices with severe consequences for ecosystem integrity, e.g. lack of natural forest regeneration after logging; 3) logging permits exceeding the inventoried volume per hectare compared to volumes approved in forest management plans; 4) non-compliance with exploitation rules specific to protected natural areas; 5) soil degradation caused by the passage of heavy machinery during rainy periods; 6) heavy machinery passing through streams; 7) no biodiversity trees and dead wood left after logging; 8) severe degradation of habitats in breach of the Habitats Directive and national legislation. Case studies from the latest investigations are presented in Annex 3 of our submission. Further data, including drone footage, can be provided on demand.

Based on the National Forest Inventory (NFI), it was estimated that from 2013 to 2018 an amount of 20.6 million cubic meters of wood was harvested annually in excess of allowances in approved forest management plans. **We have been informed that according to the new NFI 2019-2024, 17 million cubic meters were removed annually in excess of legal allowances.** It needs to be noted that this annual gap is the result of the implementation of a complex methodology and may include multiple components such as natural tree mortality, unrecorded household firewood, measurement error — not just illegal logging. **That said, the NFI estimate, corroborated with findings from recent field investigations, does provide an indication of the magnitude of illegal logging in Romania,** including illegal activities both identified and overlooked by national authorities. On another note, the existing uncertainty around the NFI estimate clearly indicates that a strong and harmonised EU Forest Monitoring Law can support the implementation of the EUDR.

In light of recent EU infringement procedures, notably INFR 2020(2033), and the submitted evidence, we consider that the **relevant industries' exports of wood and wood-based products are at considerable risk of being incompatible with article 3 of the EUDR, thus that Romania is a country with non-negligible risk of illegal wood logging.** Beyond widespread illegal logging, recent scientific studies summarised in our submission suggest that Romania has a history of forest cover loss and degradation. This summer's catastrophic flash-floods on Bistrița River sadly confirm these findings in the context of climate change. While the extent of deforestation and forest degradation, as per EUDR, is currently unknown, the precautionary principle should be applied to disincentivise any further illegal logging and related forest degradation. **Given these considerations, we strongly call for a consistent, complete and timely implementation of the EUDR.**

We look forward to your response and are available to discuss the issues brought up at your convenience.

Yours sincerely,

BRUNO MANSER FONDS
Dr. Lukas Straumann, Executive Director
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Gabriel Păun, President

³ <https://www.agentgreen.ro/wp-content/uploads/2022/10/raport-Agent-Green-preview-mic.pdf>

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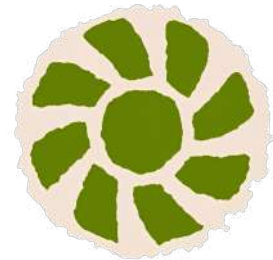


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