



## **Full and timely EUDR implementation needed to safeguard Romania's forests**

**- Briefing, September 2025 -**

1. Romania's surviving primary and old-growth forests
2. EU infringement procedures: illegal logging and habitat destruction in protected areas
3. Evidence of illegal logging and trends of forest cover loss and forest degradation
4. Loopholes in national legislation and the SUMAL timber traceability system
5. Recommendations for EUDR, a crucial law to keep Romania's forests standing

### **Summary**

This paper summarizes recent evidence from Romania with a focus on: 1) Romania's large share of primary and old-growth forests and their lack of legal protection; 2) Romania's track record of illegal wood logging, including the EU infringement procedures, and trends of forest cover loss and degradation; and 3) Loopholes in national legislation and the SUMAL timber traceability system. Based on this information, we raise concerns on Romania's forest governance, its law enforcement, and its ability to ensure that wood logged in Romania is legally harvested and free of forest degradation. We then make policy recommendations.

Romania is home to much of Europe's high biodiversity value forests, including primary, old-growth and naturally regenerating forests. Overall, only 3% of Romania's forests are strictly protected. While mapping is conducted to prepare the implementation of strict protection in line with the EU biodiversity strategy 2030, the very forests being mapped are being degraded. From an estimated 525,632 hectares of potential primary and old-growth forests identified by the Primofaro inventory (2019), around 138,000 ha with Primofaro parcels overlap have been affected by logging and likely disqualified from strict protection.

Forest investigations conducted by Romanian environmental organisation Agent Green over the past two years have detected illegal wood logging with breaches of EU and national laws all across Romania. Main detected illegalities related to wood logging include: 1) logging conducted in Natura 2000 sites without prior environmental assessments in breach of the Habitats Directive and SEA Directive; 2) incorrect implementation of logging with highly damaging consequences, e.g. lack of natural forest regeneration after logging; 3) logging permits which exceed the volumes foreseen in approved forest management plans; 4) non-compliance with exploitation rules specific to protected 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; and 8) severe degradation of habitats in breach of the Habitats Directive and national legislation. Selected case studies with data from the investigations are provided in Annex 3.

Based on the Romanian National Forest Inventory (NFI), it was estimated that from 2013 to 2018 an amount of 20.6 million cubic meters of wood was removed annually in excess of allowances in approved forest management plans. We have been informed that data from the new NFI 2019-2024 indicate that approximately 17 million cubic meters of wood were removed annually in excess of legal allowances. These estimations are subject to the implementation of a complex methodology and may include multiple components, not just illegal logging. Nevertheless, the NFI estimate, corroborated with findings from field investigations, provides an indication of the scale of illegal logging in Romania, including activities both identified and overlooked by national authorities.

Trends of forest cover loss and forest degradation in Romania over the past decades have been widely researched. For instance, Kucsicsa and Dumitrică (2019) found a loss of more than 250,000 hectares of forested area that took place in Romania between 1990 and 2012. If such trends persist, they estimated that, by 2050, Romania will lose 20% of its tree cover compared to the beginning of the century. Only a share of the identified forest cover loss and degradation will correspond to the EUDR definitions of deforestation and forest degradation, however this share must be considered in the implementation of the EUDR

In sum, findings from recent investigations, scientific studies and relevant EU infringement procedures, notably INFR 2020(2033), indicate that Romania is a country which exhibits a considerable - not a “negligible” or “zero” - risk of illegal wood logging. Therefore, the relevant industries’ exports of wood and wood-based products are at considerable risk of being non-compliant with article 3 of the EUDR. Given these considerations, we call for a consistent, complete and timely implementation of the EUDR.

## 1. Romania’s surviving primary and old-growth forests

Through the EU Biodiversity Strategy for 2030, the EU member states committed *inter alia* to strictly protecting 10% of EU land, including all remaining primary and old-growth forests in the EU, while increasing the quantity, quality and resilience of all forests in the EU. **As the EU’s remaining primary and old-growth forests are mapped and EU legislation to strictly protect them is prepared, Member States need to ensure that these invaluable forests remain standing and healthy.**

Barredo et al. 2025 found that “only Sweden, Romania, Bulgaria, and Norway accounted for nearly all of the potential primary forests in Europe.” Overall, they found “a widespread and significant increase in primary forest disturbance rates across Europe and heightened disturbance severity in many biogeographical regions.” Their findings associate the ongoing decline in primary forests across Europe with human activities including logging.<sup>1</sup>

In Romania, the Primofaro forest inventory (2019) identified 525,632 hectares of potential primary and old-growth forests, including 480,054 hectares showing no significant signs of human use since the 1960s.<sup>2</sup> The study purposely included natural forests which have been used by humans in the past but have developed again to a very high degree of naturalness. The identified forests include 116,589 ha of the “virgin and quasi-virgin” forests previously identified by Biris and Veen (2005).<sup>3</sup> An investigation by Agent Green and EuroNatur (2024)

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<sup>1</sup> Barredo, J. I., Mari Rivero, I., & Janoušková, K. (2025). Assessing disturbances in surviving primary forests of Europe. *Conservation Biology*, 39, e14404. <https://doi.org/10.1111/cobi.14404>

<sup>2</sup> 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. [https://www.euronatur.org/fileadmin/docs/Urwald-Kampagne\\_Rumaenien/PRIMOFARO\\_24092019\\_layouted.pdf](https://www.euronatur.org/fileadmin/docs/Urwald-Kampagne_Rumaenien/PRIMOFARO_24092019_layouted.pdf)

<sup>3</sup> From Primofaro study: the figure is based on the Pin Matra report (Biriş and Veen 2005) which revealed 218,000 ha of virgin forest in Romania. 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

found that since 2019, logging has affected 138,000 hectares of forest parcels containing at least 5% overlap with Primofaro-identified forests. 71,000 ha of these parcels are located inside Natura 2000 sites. Even if some are affected by relatively small interventions, once the wood extraction has started, they are no longer considered as intact and national law allows for their full exploitation. The same investigation shows that in just 3 years approximately 4.7 million cubic metres of wood were removed from forest parcels overlapping with Primofaro primary and old-growth forests. This accounts for 9.21% of the total wood volume extracted during this period in Romania (51 million m<sup>3</sup>), according to SUMAL 2.0.<sup>4</sup>

Munteanu (2021) mapped High Conservation Value Forests (HCVF) in Romania based on forest continuity since 1955, forest canopy structural and compositional complexity and anthropogenic pressures and came to the conclusion that Romania still hosts over 700,000 ha of HCV forests.<sup>5</sup> Another recent study (Munteanu et al. 2022) mapped HCVF based on forest continuity (1955–2019), canopy structural complexity, and anthropogenic pressures using an approach based on historical satellite images, remote sensing data (Landsat), and information on current anthropogenic pressures including logging. It identified 738,000 ha of HCVF, more than half of which were identified as vulnerable to current anthropogenic pressures and lacking formal protection.<sup>6</sup>

**These findings indicate that Romania has a large share of surviving primary, old-growth, and naturally regenerating forests<sup>7</sup>. Overall, only 3% of Romania’s forests are strictly protected.<sup>8</sup> However the risk of degradation as defined by the EUDR applies to all timber, including that harvested in primary and old-growth forests.** Strictly protected forests include forest areas classified under Function Type I, along with forests listed in the National Catalogue of virgin and quasi-virgin forests. To date, only 72,279.43 ha have been included in Romania’s National Catalog of Virgin and Quasi-Virgin Forests.<sup>9</sup> **This situation confirms the dire need for effectively increasing and enforcing strict protection but also for additional policy instruments to halt illegal logging and forest degradation. EUDR is an important such policy instrument**, as it is designed to: 1) make timber non-compliant if it comes from forest areas where logging is legally prohibited or conducted in breach of national legislation; or 2) make timber non-compliant if it comes from the degradation of primary and old-growth forests (per EUDR definition of degradation).

The EU Commission Guidelines for defining, mapping, monitoring and strictly protecting primary and old-growth forests (2023) include the following recommendations: “Identified areas of primary and old-growth forests should be placed under strict protection, as stated in the EU Biodiversity and Forest Strategies for 2030. Primary and old-growth forests that met the definitions of this document after 20 May 2020 (when the EU Biodiversity Strategy was published) but have since lost their defining characteristics due to human activity, should also be strictly protected so they can redevelop. In line with the precautionary principle, Member

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<sup>4</sup> Agent Green & EuroNatur (2024). Massive Logging of Primary Forests and Old-growth Forests in Romania. 2021-2024.

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

<sup>5</sup> Munteanu, C. (2021). High Conservation Value Forests in Romania (0.0.1) [Data set]. Zenodo.

<https://doi.org/10.5281/zenodo.4555708>

<sup>6</sup> Munteanu, C., Senf, C., Nita, M. D., Sabatini, F. M., Oeser, J., Seidl, R., & Kuemmerle, T. (2022). Using historical spy satellite photographs and recent remote sensing data to identify high-conservation-value forests. *Conservation Biology*, 36:e13820.

<https://doi.org/10.1111/cobi.13820>

<sup>7</sup> As defined in EUDR, Art. 2 (9): “naturally regenerating forest’ means forest predominantly composed of trees established through natural regeneration; it includes any of the following: (a) forests for which it is not possible to distinguish whether planted or naturally regenerated; (b) forests with a mix of naturally regenerated native tree species and planted or seeded trees, and where the naturally regenerated trees are expected to constitute the major part of the growing stock at stand maturity; (c) coppice from trees originally established through natural regeneration; (d) naturally regenerated trees of introduced species.”

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32023R1115>

<sup>8</sup> <https://wwf.ro/paduri/wwf-protects-additional-900-ha-of-virgin-forests/>

<sup>9</sup> Ministry of Environment, Water and Forests (2023). Catalogul național al pădurilor virgine și cvasivirgine, 26 May 2023, <http://www.mmediu.ro/articol/catalogul-national-al-padurilor-virgine-si-cvasivirgine/6233>

States should without delay strictly protect those forest areas for which there is a strong probability, based on the currently available information, that they meet definitions and criteria set out in this document.”<sup>10</sup> **To date, no forests meeting these criteria in Romania have been put under strict protection. The full and timely implementation of the EUDR is urgently needed to disincentivise illegal logging and resulting degradation in these forests.**

## **2. EU infringement procedures: illegal logging and habitat destruction in Natura 2000 protected areas**

Illegal logging linked to corruption is a pervasive issue in Romania. In 2016, a bill was adopted that makes illegal logging and any action “which endangers the country’s water, forests and lands” a threat to national security.<sup>11</sup> Despite numerous legislative revisions, measures to improve wood traceability and the on-going EU infringement procedures,<sup>12</sup> illegal logging is continuing unabated.<sup>13</sup>

In its letter of formal notice of February 2020 and the reasoned opinion of July 2020, the European Commission urged Romania to properly implement the EU Timber Regulation (Regulation (EU) 995/2010). It noted that “the national authorities have been unable to effectively check the operators and apply appropriate sanctions. Inconsistencies in the national legislation do not allow Romanian authorities to check large amounts of illegally harvested timber. In addition, the Commission has found that the Romanian authorities manage forests, including by authorising logging, without evaluating beforehand the impacts on protected habitats as required under the Habitats Directive and Strategic Environmental Assessment Directives. Furthermore, there are shortcomings in the access of the public to environmental information in the forest management plans. The Commission has also found that protected forest habitats have been lost within protected Natura 2000 sites in breach of the Habitats and Birds Directives.”<sup>14</sup>

In Romania, commercial logging is allowed in Natura 2000 protected areas on large shares of their surface, often without previously assessing the impact of logging through environmental assessments. Although Romania has started designating Special Areas of Conservation (SACs) for its Natura 2000 Sites of Community Importance (SCI) in 2020, progress has been slow, leaving these protected areas without management plans and site-specific conservation objectives and measures, in breach of the EU Birds and Habitats Directives. According to the

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<sup>10</sup> [https://environment.ec.europa.eu/publications/guidelines-defining-mapping-monitoring-and-strictly-protecting-eu-primary-and-old-growth-forests\\_en](https://environment.ec.europa.eu/publications/guidelines-defining-mapping-monitoring-and-strictly-protecting-eu-primary-and-old-growth-forests_en)

<sup>11</sup> <https://www.occrp.org/en/news/romania-illegal-logging-declared-a-threat-to-national-security>

<sup>12</sup> The EU infringement procedures we are referring to are:

- INFR(2020)2033 (EUTR, Birds and Habitats Directives). Formal notice from February 2020 and reasoned opinion from July 2020: Romania is not properly implementing the EU Timber Regulation (Regulation EU No. 995/2010) and large-scale illegal logging takes place; Romanian authorities still manage forests, including by issuing logging permits, without prior evaluation of impacts on protected habitats as required under the Habitats Directive (Directive 92/43/EEC) and the Strategic Environmental Assessment Directives (Directive 2001/42/EC). It has been proven that protected forest habitats have been lost within Natura 2000 sites in breach of the Habitats and Birds Directives (Directive 79/409/EEC);

- INFR(2020)2238 (Habitats Directive). Formal notice July 2020. Romania has not designated its EU Sites of Community Importance (SCIs) as Special Areas of Conservation (SACs) and, it has generally and persistently failed to set site-specific detailed conservation objectives and measures, thus failing to maintain or restore the protected species and habitats to a favourable conservation status;

- INFR(2020)2297 (Habitats Directive). Formal notice October 2020. Among other issues, the Romanian legislation does not explicitly mention that conservation measures contained in management plans need to take into account the ecological requirements of the natural habitat types and species present on the Natura 2000 sites. This has a direct impact on the quality of the management plans as they may not contain the necessary measures to protect these habitat types and the corresponding species. The national law therefore limits the scope of a key provision of the Directive to activities within Natura 2000 sites.

<sup>13</sup> European Parliament (2023). PETI Mission Report. [https://www.europarl.europa.eu/doceo/document/PETI-CR-752893\\_EN.pdf](https://www.europarl.europa.eu/doceo/document/PETI-CR-752893_EN.pdf)

<sup>14</sup> [https://ec.europa.eu/commission/presscorner/detail/en/inf\\_20\\_1212](https://ec.europa.eu/commission/presscorner/detail/en/inf_20_1212)

successive analyses of the state of Romania's Natura 2000 sites conducted by EuroNatur, ClientEarth and Agent Green, destructive logging, including in protected areas and their buffer zones, has increased since 2020.<sup>15</sup> **It seems that the threat of new measures to halt destructive logging has sparked “panic logging” or extracting as much wood as possible while still possible, and disqualifying entire forest areas from protection.<sup>16</sup> Any further delay of the EUDR will further this trend of panic logging.**

Recent investigations show that widely practised progressive logging (logging type in Romania) is highly damaging for the analysed Natura 2000 sites because it is conducted at too short intervals causing the forest to lose its natural regenerative capacity. It was found to often result in barren landscapes such as cleared forest areas,<sup>17</sup> which in order to be reforested, may be converted into plantations.

All in all, the investigations conducted so far provide clear evidence of the following facts:

- **To date, Romania has not properly applied the EUTR and thus has not been effective in stopping the placing on the market of illegally harvested timber and timber products derived from such timber. The EUDR has stronger provisions and if properly implemented, it will curtail such illegalities.**
- To date, Romania has not properly applied the EU nature protection legislation, with the result that protected forest habitats have been and are being destroyed or degraded within Natura 2000 sites in breach of the Habitats and Birds Directives; **Romanian laws are not aligned to meet EU nature conservation goals, still allowing for large-scale gradual or complete removal of forest cover in Natura 2000 sites, a part of which consists of forest degradation as per EUDR.**

### **3. Evidence of illegal logging and trends of forest cover loss and forest degradation**

According to Global Forest Watch, in 2010, Romania had a forest cover of 33% of its land area.<sup>18</sup> **From 2021 to 2024 alone, the country reportedly lost 53.400 ha of natural forest cover.<sup>19</sup>** According to estimates from the Romanian National Institute of Statistics, in 2018, Romania had a forest cover of 27.61%.<sup>20</sup>

**Forest investigations conducted by Romanian environmental organisation Agent Green over the past two years have detected widespread illegal logging with breaches of EU and national laws all across Romania.** The investigations are based on analyses of satellite images, drone footage, field observations, SUMAL data and official documents such as forest management plans. Detected illegalities related to wood logging include: 1) logging conducted in protected areas without prior environmental assessments in breach of the Habitats Directive / SEA Directive, i.e. logging permits issued without prior appropriate assessments of environmental impacts of logging, forest management plans done without SEAs; 2) incorrect implementation of various logging types (e.g. progressive logging) with

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<sup>15</sup> Agent Green and EuroNatur (2023). Investigation of Romanian forests in Natura 2000 sites, [https://www.euronatur.org/fileadmin/docs/Urwald-Kampagne\\_Rumaenien/Investigation\\_of\\_Romanian\\_forests\\_in\\_Natura\\_2000\\_sites.pdf](https://www.euronatur.org/fileadmin/docs/Urwald-Kampagne_Rumaenien/Investigation_of_Romanian_forests_in_Natura_2000_sites.pdf)

<sup>16</sup> Illegal logging in Romania is often disguised as legal, as shown in the following report: Agent Green and EuroNatur (2022). TEN methods of theft and reasons for updating SUMAL, [https://www.euronatur.org/fileadmin/docs/Urwald-Kampagne\\_Rumaenien/agent\\_green\\_report\\_ten\\_methods\\_of\\_stealth\\_and\\_ten\\_reasons\\_to\\_upgrade\\_sumal.pdf](https://www.euronatur.org/fileadmin/docs/Urwald-Kampagne_Rumaenien/agent_green_report_ten_methods_of_stealth_and_ten_reasons_to_upgrade_sumal.pdf)

<sup>17</sup> Agent Green and EuroNatur (2023). Investigation of Romanian forests in Natura 2000 sites, [https://www.euronatur.org/fileadmin/docs/Urwald-Kampagne\\_Rumaenien/Investigation\\_of\\_Romanian\\_forests\\_in\\_Natura\\_2000\\_sites.pdf](https://www.euronatur.org/fileadmin/docs/Urwald-Kampagne_Rumaenien/Investigation_of_Romanian_forests_in_Natura_2000_sites.pdf)

<sup>18</sup> Global Forest Watch (2025), <https://www.globalforestwatch.org/dashboards/country/ROU/>

<sup>19</sup> Mazur, E., M. Sims, E. Goldman, M. Schneider, F. Stolle, M. Daldoss Pirri, and C.R. Beatty. 2023. "SBTN Natural Lands Map". Accessed through Global Forest Watch on 27/08/2025. [www.globalforestwatch.org](http://www.globalforestwatch.org)

<sup>20</sup> National Institute of Statistics, 2018, <http://statistici.insse.ro:8077/tempo-online/>

highly damaging consequences on forest ecosystems, e.g. lack of natural forest regeneration after logging; 3) logging permits which exceed the inventoried volume per hectare compared to volumes foreseen in the 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 and endangerment of species. Key data from the investigations are included in annex 3. Further data, including comprehensive imagery and drone footage, can be provided on demand.

Numerous other forest investigations have confirmed the widespread phenomenon of illegal logging and related violence in Romania.<sup>21</sup> Six officers trying to stop illegal logging were murdered and 650 persons (rangers, activists, journalists etc.) were otherwise attacked in relation to wood logging in recent years.<sup>22</sup>

**The National Forest Inventory (NFI)<sup>23</sup> has been instrumental in assessing the scale of illegal logging in Romania.** The NFI covers all forest vegetation in Romania: the national forest fund, forest vegetation outside the forest fund, and trees outside the forest. Based on NFI results, it has been estimated and acknowledged by the Romanian government<sup>24</sup> that from 2013 to 2018, from a total annual removal of 38 million cubic meters, approx. 20.6 million m<sup>3</sup> of wood were removed annually in excess of allowances in approved forest management plans.<sup>25</sup> We have been informed that according to the **NFI cycle 2019-2024**, the total annual removal of wood during these past years was **35 million cubic metres, from which 17 million m<sup>3</sup> were in excess of legal allowances.** It needs to be noted that this gap is the result of a complex methodology and may include multiple components (such as natural tree mortality, unrecorded household firewood, measurement error) — not just illegal logging.<sup>26</sup> **That said, the NFI estimate corroborated with evidence from satellite and aerial imagery and investigations on the ground does provide an indication of the scale of illegal logging in Romania - whether detected or undetected by national authorities.**

For the first three quarters of 2024 alone, official data on illegal logging from field checks by the National Forest Administration Romsilva show that there were 14,671 m<sup>3</sup> of illegally logged timber and 7.3 million RON in damage.<sup>27</sup> These data only reflect the results of Romsilva's field checks and reported losses within state-managed forests; they may not capture the full scope of illegal logging nationally, particularly in private forests.<sup>28</sup>

According to Albulescu et al. (2023), Romanian authorities failed to timely implement systems to prevent illegal logging (e.g. EUTR, SUMAL timber traceability system), therefore over the past years a vicious cycle has developed: 1) the development of restrictive forestry regulations

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<sup>21</sup> <https://tinyurl.com/56nuwcvp> ; <https://tinyurl.com/yymm493b>

<sup>22</sup> The New Republic, Alexander Sammon, February 16, 2022, Ikea's Race for the Last of Europe's Old-Growth Forest, <https://newrepublic.com/article/165245/ikea-romania-europe-old-growth-forest>

<sup>23</sup> Study carried out by the Bucharest Institute for Forest Research and Management since 2006, covering the entire forest vegetation in Romania, i.e. the national forest fund, forest vegetation outside the national forest fund and trees outside the forest. Source: <https://roifn.ro/site/despre-ifn/>

<sup>24</sup> The Ministry of Environment, Water, and Forests acknowledged that "the allowable cut was exceeded by 100% every year of the past decade as a result of illegal logging." Source: EIA (Environmental Investigation Agency). Critical Updates Made to Romania's Forest Inspector System. 2020. <https://us.eia.org/blog/20200417-forest-inspector-updates> cited in: Albulescu, A.-C.; Manton, M.; Larion, D.; Angelstam, P. The Winding Road towards Sustainable Forest Management in Romania, 1989–2022: A Case Study of Post-Communist Social–Ecological Transition. *Land* 2022, 11, 1198. <https://doi.org/10.3390/land11081198>

<sup>25</sup> Agent Green (2020). Viziunea Agent Green pentru pădurea României. Report available at: <https://www.agentgreen.ro/wp-content/uploads/2020/07/VIZIUNEA-AGENT-GREEN-PENTRU-PADUREA-ROMANIEI.pdf>; Greenpeace Romania Reports, Illegal Cuts of Romania's Forests, 2009–2011, 2012, 2013–2014, 2015, 2016 2017, 2018. Available at: <https://www.greenpeace.org/romania/ro/campanii/paduri/publicatii/>; and European Parliament (2023). PETI Mission Report. [https://www.europarl.europa.eu/doceo/document/PETI-CR-752893\\_EN.pdf](https://www.europarl.europa.eu/doceo/document/PETI-CR-752893_EN.pdf)

<sup>26</sup> Some reviews note that "wood-balance" calculations can double-count or misallocate volumes if they don't model: a) deadwood dynamics and salvage, b) household self-consumption of fuelwood outside formal markets, and c) time-lags between tree growth, mortality, and reported removals. Source: <https://www.mdpi.com/2073-445X/11/8/1198>

<sup>27</sup> [actmedia.eu/jurnalul.ro/forest-trends.org](https://actmedia.eu/jurnalul.ro/forest-trends.org)

<sup>28</sup> State-owned forests represent approximately 48% of Romania's forest fund. Romsilva also manages certain private forests.

that are not respected and enforced; 2) the spawning of ways to bypass the regulations, and 3) the further tightening of the regulations.<sup>29</sup>

**Romania's trends of forest cover loss and forest degradation over the past decades have been widely researched.** Kucsicsa and Dumitrică (2019) have identified deforestation occurring in the Romanian Carpathians as a major concern due to its implications for climate change, biodiversity loss, land degradation and extreme weather events. They found that between 1990 and 2012, Romania lost more than 250,000 hectares of forest cover. If such trends persist, Kucsicsa and Dumitrică (2019) estimate that, by 2050, Romania will lose 20% of its tree cover compared to the beginning of the century.<sup>30</sup>

Albulescu (2019) evaluated the forest cover loss in twelve Romanian counties during 1990-2018 and identified "massive illegal cuts that are difficult to monitor, record and sanction" as the main issue. The three identified counties with the highest overall forest loss (Vâlcea, Gorj, Maramureş) were also the counties with the highest rates of felled forest area and illegal logging.<sup>31</sup> Furthermore, Albulescu et al. 2023 illustrated large-scale anthropogenic transformations that have reportedly led to the loss of potential natural forest and woodland types in Romania (Data sources: Bohn et al., 2004 and Copernicus, 2018).<sup>32</sup> In an older study, Knorn et al. (2013) analysed trends in old-growth forest cover in Romania using satellite imagery. They found that forest cover in Romania declined by 1.3% from 2000 to 2010, and that 72% of the old-growth forest disturbances occurred inside protected areas.<sup>33</sup>

For Romania, Global Forest Watch shows a loss of 453.000 ha of tree cover from 2001 to 2024, equivalent to 5.7% of the 2000 tree cover area. Reported gains in tree cover amount to 224.000 ha for the period 2000-2020.<sup>34</sup> However, tree cover gain in plantations and young forest stands does not compensate in terms of carbon storage and other ecosystem functions for the loss of natural mixed species forests, some of which were primary and old-growth.<sup>35</sup>

Ciucu-Durnoi and Delcea (2024) conducted a county-level analysis of the degree of degradation for forests, pastures, lakes and rivers in Romania. They found an average country-wide forest degradation rate of 12.88%, with the percentages varying from 5% to 81% per county. The main identified causes for forest degradation were the forests' fragmentation

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<sup>29</sup> Albulescu, A.-C., Manton, M., Larion, D., Angelstam, P. (2023). Challenges faced by forest governance and management in Romania. Between top-down communist hand-me-downs and the bottom-up sustainability. In book: Ecological Concerns in Transition State of the Region Report 2022/23 CBEES (pp.180-189) Publisher: Centre for Baltic and East European Studies, CBEES, Södertörn University.

<sup>30</sup> Kucsicsa, G., & Dumitrică, C. (2019). Spatial modelling of deforestation in Romanian carpathian mountains using gis and logistic regression. *Journal of Mountain Science*, 16(5), 1005–1022. <https://doi.org/10.1007/s11629-018-5053-8>

<sup>31</sup> Albulescu, A.-C. (2019). The evaluation of forest loss in Romania's most threatened counties. A multi-criteria and GIS based approach. Conference: 19th SGEM International Multidisciplinary Scientific GeoConference EXPO Proceedings. DOI: 10.5593/sgem2019V1.4/S03.053

<sup>32</sup> Albulescu, A.-C., Manton, M., Larion, D., Angelstam, P. (2023). Challenges faced by forest governance and management in Romania. Between top-down communist hand-me-downs and the bottom-up sustainability. Data sources: Bohn et al., "2004; Copernicus. Forest Type layer" (2018). Available at: <https://land.copernicus.eu/pan-european/high-resolution-layers/forests/forest-type-1> U. Bohn, G. Gollub, C. Hettwer, Z. Neuhäuslová, T. Raus, H. Schlüter, H. Weber, "Karte der natürlichen Vegetation Europas" [Map of the natural vegetation of Europe] *Maßstab* [Scale] 1: 2 500 000 (Agency for Nature Conservation: Bonn, Germany, 2004); A. Feurdean, R. Grindean, G. Florescu, I. Tanțău, E.M. Niedermeyer, A.C. Diaconu, T. Hickler, "The transformation of the forest steppe in the lower Danube Plain of southeastern Europe: 6000 years of vegetation and land use dynamics", *Biogeosciences*, vol. 18 no. 3 (2021): 1081–1103

<sup>33</sup> Knorn, J., Kuemmerle, T., Radeloff, V. C., Keeton, W. S., Gancz, V., Biriş, I.-A., Svoboda, M., Griffiths, P., Hagatis, A., & Hostert, P. (2013). Continued loss of temperate old-growth forests in the Romanian Carpathians despite an increasing protected area network. *Environmental Conservation*, 40(2), 182–193. <https://www.jstor.org/stable/26319125>

<sup>34</sup> Global Forest Watch (2024), <https://www.globalforestwatch.org/dashboards/country/ROU/>

<sup>35</sup> For instance, it has been found that old-growth mixed species forests are 70% more effective as carbon sinks than monoculture forests. Source: Warner, E., Cook-Patton, S.C., Lewis, O.T., Brown, N., Koricheva, J., Eisenhauer, N., Ferlian, O., Gravel, D., Hall, J.S., Jactel, H., Mayoral, C., Meredieu, C., Messier, C., Paquette, A., Parker W.C., Potvin, C., Reich, P.B., Hector, A. (2023). Young mixed planted forests store more carbon than monocultures—a meta-analysis. *Front. For. Glob. Change*, 09 November 2023, Sec. Planted Forests, Volume 6 - 2023 | <https://doi.org/10.3389/ffgc.2023.1226514>

through the construction of roads, deforestation and wood exploitation, industrial and agricultural activities as well as improper waste storage.<sup>36</sup>

Diaconu et al. (2024) demonstrated significant trends of logging-driven forest cover loss in the Eastern Carpathians resulting in a total loss of 76,205 forest patches for the period 2001–2022. It was found that 57% of the loss patches led to the fragmentation and disorder of compact forest areas. Forest fragmentation was linked to increased flood risk in the affected regions as “fragmented and disorderly forests may lose their ability to regulate water flows and mitigate flood risk, exacerbating land vulnerability to extreme precipitation events.”<sup>37</sup> In a study of deforested land and frequency of floods in the period 2000–2016, Peptenatu et al. (2019) had previously found a clear influence of large-scale forest cuts on the frequency of floods.<sup>38</sup> Sadly, this summer’s catastrophic floods on Bistrița river in Romania confirm these findings in the context of climate change.<sup>39</sup>

**The presented evidence as well as Romania’s systemic failure to meet the requirements of the EUTR indicate that strong wood traceability and monitoring are crucial to preventing further illegal logging and related forest degradation. The presented trends of illegal logging, forest cover loss and forest degradation and their implications for nature and climate are very worrying, in a context in which Romania harbours some of Europe’s most extensive remaining tracts of high biodiversity value forests and the largest populations of large carnivores such as brown bear, grey wolf, and lynx. We believe that the presented evidence shows the importance of swift and ambitious implementation of the EUDR. Further, Romania should be classified as high risk in upcoming EUDR reviews.**

Finally, it needs to be mentioned that scientific studies generally use broader definitions of forest degradation than the EUDR. Such definitions do not only focus on “structural changes to the forest” but also assess the forest quality or health and its ability to perform ecosystem services such as biodiversity conservation, carbon storage, regulation of local climate, provision of clean drinking water etc. The EUDR definition of forest degradation may thus leave out a large share of ongoing forest degradation, as scientifically defined, which indicates a need for revision.

#### **4. Loopholes in national legislation and SUMAL timber traceability system**

The forest policy in Romania consists of the Forest Code, the implementing acts, and the technical norms. The new Forest Code of December 2024 (Law No. 331/2024), a milestone in Romania’s National Recovery and Resilience Plan, has introduced some positive changes but overall it has failed to bring about meaningful reform that tackles the root causes of illegal logging, deforestation and forest degradation in Romania. Moreover, the new Forest Code has brought about a number of serious issues, including the following:

- **The new law does not separate between regulatory, administrative, and commercial activities related to forests.** This overlap of responsibilities in public

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<sup>36</sup> Ciucu-Durnoi, A.-N.; Delcea, C. Ecosystem Degradation in Romania: Exploring the Core Drivers. *Stats* 2024, 7, 79-94. <https://doi.org/10.3390/stats7010006>

<sup>37</sup> Diaconu D.C., Andronache I., Gruia A.R., Bazac T. and Băloi A.M. (2024). Evaluation of forest loss data using fractal algorithms: case study Eastern Carpathians–Romania. *Front. For. Glob. Change* 7:1432739. doi: 10.3389/ffgc.2024.1432739

<sup>38</sup> Peptenatu, D. et al. (2020). Deforestation and Frequency of Floods in Romania. In: Negm, A., Romanescu, G., Zelenáková, M. (eds) *Water Resources Management in Romania*. Springer Water. Springer, Cham. [https://doi.org/10.1007/978-3-030-22320-5\\_9](https://doi.org/10.1007/978-3-030-22320-5_9)

<sup>39</sup> <https://tvrinfo.ro/imagini-socante-pe-raul-bistrita-mii-de-metri-cubi-de-busteni-si-deseuri-ameninta-lacul-de-la-bicaz-se-monteaza-o-bariera-plutitoare/>  
<https://tvrinfo.ro/inundatiile-din-suceava-si-neamt-au-lasat-in-urma-lor-peisaje-dezolante-viitura-a-facut-ravagii-apel-disperat-la-solidaritate/>

institutions (e.g. the National Forest Administration Romsilva) perpetuates conflicts of interest, corruption and makes the entire forestry system vulnerable.

- The National Forest Fund (FFN) is under increased pressure. Romania is gradually losing significant areas of forest due to permissive provisions that facilitate their removal from the FFN. Land with forest vegetation outside the FFN, although it meets the definition of forest, is not officially recognized as forest by the new Forest Code. This **exposes over 500,000 ha of forests with timber worth at least €15 billion to uncontrolled deforestation and forest degradation**. These forests must be urgently included in the FFN, while measures must be taken to compensate owners. It is much more cost-effective for the state to compensate owners for naturally occurring forests than to reforest degraded or abandoned arable land.
- **The national afforestation program has been drastically reduced.** The afforestation/reforestation target has been reduced 33-fold: from 2 million ha by 2035 (initial plan) to just 60,000 ha by 2030, a decision that increases the risk of aridification and undermines climate mitigation and renaturation efforts.
- **Provisions that encourage forest abuse**, such as: 1) Clearcutting disguised as ecological reconstruction; 2) Construction and development in forest parks, including night lighting or the planting of invasive exotic species; 3) The construction of unplanned logging roads without adequate environmental assessments, which increases the risk of soil and forest degradation.
- **Weakening of strict controls and regulations.** With the changes made, the forest guard's approval is no longer required for work located near the forest edge in the case of projects of national or local interest. Also, marking timber still depends on using a basic tool, the forestry hammer, which has been involved in many cases of fraud. This forestry hammer can mean both a presumption of guilt against honest foresters and the perfect alibi for wood thieves.
- **The integrity of forestry personnel remains problematic.** Forestry personnel remain one of the main actors involved in modern timber theft through the manipulation of official documents. Increasing their salaries by 25% without a thorough reform and integrity assessments is not a real solution.
- **Free access for citizens to forests is a victory open to interpretation.** Although access is guaranteed in theory, forest administrators can "temporarily" restrict access to large forest areas, citing reasons such as the risk of fire, logging, or hunting. Such restrictions can be abusively extended throughout the year, preventing free public access.
- **It is no longer a criminal offence to fail to ensure forest regeneration within two years of completion of the forest works (logging)**, the forest areas that have been cleared and those offered as compensation.<sup>40</sup>

To protect Romania's forests and prevent their further degradation, Agent Green has made the following proposals:

1. Change the architecture of the forestry system by clearly separating administrative, commercial, regulatory, and control functions between different institutions.
2. Establishing a national program to reforest 40% of the country's surface.

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<sup>40</sup> AGENT GREEN (2025). Analysis of the New Forest Code. [https://www.agentgreen.ro/wp-content/uploads/2025/01/20250119\\_analiza\\_cod\\_silvic\\_nou\\_agent\\_green.pdf](https://www.agentgreen.ro/wp-content/uploads/2025/01/20250119_analiza_cod_silvic_nou_agent_green.pdf)

3. Adapting forestry to climate change by strictly protecting 10% of the national forest fund in accordance with the EU biodiversity strategy.
4. Practicing close to nature forestry in the remaining 90% of Romania's forests: banning clearcutting, progressive cutting, and accidental cutting. Permanently preserving at least 70% of the native standing timber volume in each forest hectare.
5. Creating a legislative framework that guarantees real free public access to forests and combats abuse by administrators.
6. Complete digitalization of traceability and monitoring processes for illegal logging (including SUMAL upgrades).
7. Periodic evaluation of the integrity of forestry personnel and application of strict sanctions for abuse.

SUMAL is Romania's national timber traceability system including a central open database with real-time information on all wood transports in the country. It is a best practice system based on digitised wood monitoring and tracking that aims to reduce illegal logging. It has been in continuous operation since 2014 and has been upgraded several times.<sup>41</sup>

All companies transporting wood in Romania must use the SUMAL mobile application to register key information about the wood shipment, including the driver's name, the truck's licence plate number, the sender and recipient of wood, and the type, amount, quality and species of the wood they are transporting. The user must submit three photos of the vehicle, after which it must register the start of the journey. All of these operations can be done online or offline. When offline, when the driver reaches cell phone connectivity, the data is automatically uploaded to SUMAL's central database. As the vehicle drives, the SUMAL app records the GPS track of the journey. When the journey is complete, this information is uploaded to the SUMAL database.<sup>42</sup> In 2016, the Forest Inspector was released, an online geoportal in which data from all registered SUMAL transports from the past 72 hours can be publicly accessed. The Forest Inspector also has a mobile app, in which users can type in the licence plate number of any truck transporting wood in Romania to check its legality and, if needed, alert the police. It has been reported that within three months of the Forest Inspector release, the number of transports registered in SUMAL increased by 60%. In 2021, SUMAL 2.0 extended the system's coverage to harvest and inventory operations and expanded public transparency of the data.<sup>43</sup>

Despite SUMAL being a global example of best practice, weaknesses remain making illegal timber transports go undetected. A 2021 Agent Green investigation revealed ten "methods of theft" typically used by companies to circumvent SUMAL and get away with what might be illegally harvested wood. Widespread identified methods consist of, for example, declaring in SUMAL wood volumes and qualities (significantly) lower than those actually transported, or using the same justifying documents for several wood transports.<sup>44</sup> A 2024 OCCRP/RISE investigation also revealed that wood that may be harvested illegally is routinely entering the supply chain in Romania. The main reasons found were the uploading of fake images and other shortcomings of the SUMAL system (e.g. limited public availability of images, system could not be searched by company name etc).<sup>45</sup> Last year, the Romanian Ministry of

<sup>41</sup> EIA (2024). IKEA's Romanian wood sourcing woes highlight the need for national transparent timber traceability systems across Europe, <https://eia.org/blog/ikeas-romanian-wood-sourcing-woes-highlight-the-need-for-national-transparent-timber-traceability-systems-across-europe/>

<sup>42</sup> *Ibidem*

<sup>43</sup> *Ibidem*

<sup>44</sup> Agent Green (2022). Ten methods of theft and reasons for updating SUMAL. Available at: [https://www.euronatur.org/fileadmin/docs/Urwald-Kampagne\\_Rumaenien/agent\\_green\\_report\\_ten\\_methods\\_of\\_stealth\\_and\\_ten\\_reasons\\_to\\_upgrade\\_sumal.pdf](https://www.euronatur.org/fileadmin/docs/Urwald-Kampagne_Rumaenien/agent_green_report_ten_methods_of_stealth_and_ten_reasons_to_upgrade_sumal.pdf)

<sup>45</sup> <https://www.occrp.org/en/investigations/the-simple-fraud-undermining-europes-most-sophisticated-timber-tracing-system>

Environment, Waters and Forests (MMAP) announced new upgrades to SUMAL, i.e. video cameras to be installed on forest roads, satellite imagery, AI solutions for analysis of photos submitted in SUMAL.<sup>46</sup> **These are important solutions, however they have not been implemented yet. They need to be implemented and tested before it can be concluded that the existing SUMAL loopholes have been addressed and no more illegally harvested wood is entering the supply chain.**

## 5. Recommendations for EUDR, a key law to keep Romania's forests standing

**Article 3 of the EUDR states that commodities that fall under the scope of EUDR must be produced in accordance with the relevant legislation of producer countries in order to be placed on the EU market.<sup>47</sup> Under the EUDR, such legislation includes laws on environmental protection and forest-related rules, including forest management and biodiversity conservation, where directly related to wood harvesting.<sup>48</sup> Countries or parts thereof classified as high risk are areas where there is a high likelihood that relevant commodities, in Romania's case wood, are non-compliant with these laws.<sup>49</sup>**

According to art. 29 of the EUDR, the criteria used to determine the risk level of countries include the "rate of deforestation and forest degradation" in a country or parts thereof. Under art. 29(4)(d), the Commission may also assess "whether the country concerned has national or subnational laws in place, including in accordance with Article 5 of the Paris Agreement, and takes effective enforcement measures to tackle deforestation and forest degradation, and to avoid and penalise activities leading to deforestation and forest degradation and in particular whether it applies penalties of sufficient severity to deprive of the benefits accruing from deforestation or forest degradation" as well as "whether the country concerned makes relevant data available transparently".

**Our review of existing evidence as well as the EU infringement procedures, notably INFR 2020(2033), indicate that Romania is a country which exhibits a considerable risk of illegal wood logging.** In addition to illegal logging, recent scientific findings suggest that Romania is a country with trends of forest cover loss and forest degradation. While the extent of deforestation and forest degradation as per EUDR is currently unknown, the precautionary principle should be applied. **Given these reasons, we consider that Romania cannot be simply categorised as "no risk" of non-compliance with Article 3 (a) and (b) of the EUDR. We refer here to the high risk of illegal wood logging and to wood harvesting inducing forest degradation after 31 December, 2020.**

Considering the evidence presented, we recommend the European Commission to:

- **Reject motions to re-open the EUDR and introduce a "negligible risk" category.** The case study of Romania shows that there is significant illegal logging in the EU, for example due to violations of the EUTR, or the Nature Directives through significant deterioration/destruction of habitats of protected species in EU protected areas. Forest degradation is a significant problem beyond Romania, for example due to large-scale clearcutting in primary/naturally regenerating forests and their replacement with monocultures, for example in Sweden and Finland.

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<sup>46</sup> <https://www.agerpres.ro/economic-intern/2024/04/08/fechet-sumal-va-beneficia-de-servicii-de-analiza-in-timp-real-bazate-pe-inteligenta-artificiala--1277349>

<sup>47</sup> EUDR, art. 3.

<sup>48</sup> EUDR, art. 2 (40).

<sup>49</sup> EUDR, art. 29.

- **A “negligible risk” category would mean no due diligence statements from countries, some of which would likely be non-European** (e.g. USA). This could lead to a massive increase in imports of illegally harvested and cheap timber into the EU, severely affecting the market for domestic timber production.
- **Designate Romania as a high risk country under reviews of the EUDR risk benchmarking**, pending Romania’s meaningful reform to address systematic illegal logging and, in the long term, to prevent illegal logging and forest degradation.
- **Support Romania’s efforts to increase transparency, wood traceability, and legality** by tackling loopholes in legislation and addressing weaknesses in the SUMAL wood traceability system, that are still being used to circumvent the system and put on the market illegally harvested wood.
- **Provide more guidance to operators and the Competent Authority to correctly apply the EUDR**, so that Romania may avoid future EU infringement procedures on illegal logging such as the on-going procedures on EUTR. Small forest owners in particular are often unfamiliar with EU management systems and (online) GIS applications and need increased support in order to be able to meet EUDR requirements (“Traces”).
- **More generally, support Romania to deliver on its Green Deal commitments, notably to apply the precautionary principle and strictly protect at least 10% of its lands, including all mapped and yet to be mapped primary, old-growth and other high biodiversity value forests, based on existing studies, pending legally binding EU law implementing the EU biodiversity strategy for 2030.**
- **Support the transition to closer to nature forestry and nature restoration in degraded forests by redirecting European subsidies currently directed to harmful forestry and low added value products.**<sup>50</sup>

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<sup>50</sup> A recent study looks into the current state of EU forest financing and makes recommendations for a just transition to a socially, environmentally and economically resilient forest industry. It finds that:

- To transition Europe’s forests towards closer-to-nature forestry, an estimated €2.5 billion/year is needed directly for foresters.
- When adding research and development, forest restoration in protected areas, capacity building and training, this figure rises to €5 billion per year until 2050.
- This money already exists - €5.8 billion/year in harmful subsidies have been identified that are weakening forest resilience and supporting production of economically and ecologically low-value products (such as paper packaging and bioenergy). Such subsidies are also hard for small forest actors to access.

Source: Sotirov, M. 2025. Funding Resilient Forests: Rethinking EU and State Subsidies.  
[https://www.fern.org/fileadmin/uploads/fern/Documents/2025/Funding\\_Resilient\\_Forests\\_July\\_2025.pdf](https://www.fern.org/fileadmin/uploads/fern/Documents/2025/Funding_Resilient_Forests_July_2025.pdf)

## **Annexes:**

### **Annex 1: Reports and articles regarding illegal logging in Romania**

Agent Green and EuroNatur (2024). Massive Logging of Primary Forests and Old-growth Forests in Romania, 2021-2024 [https://www.euronatur.org/fileadmin/docs/Urwald-Kampagne\\_Rumaenien/REPORT - Massive Logging in PF OGF in Romania 2021-2024.pdf](https://www.euronatur.org/fileadmin/docs/Urwald-Kampagne_Rumaenien/REPORT_-_Massive_Logging_in_PF_OGF_in_Romania_2021-2024.pdf)

Agent Green and Bruno Manser Fonds (2024). IKEA: Smart Outside, Rotten Inside. [https://bmf.ch/upload/Kampagnen/Ikea/AG\\_BMF\\_report\\_IKEA\\_web\\_EN.pdf](https://bmf.ch/upload/Kampagnen/Ikea/AG_BMF_report_IKEA_web_EN.pdf)

Agent Green and EuroNatur (2023). Investigation of Romanian forests in Natura 2000 sites, [https://www.euronatur.org/fileadmin/docs/Urwald-Kampagne\\_Rumaenien/Investigation of Romanian forests in Natura 2000 sites.pdf](https://www.euronatur.org/fileadmin/docs/Urwald-Kampagne_Rumaenien/Investigation_of_Romanian_forests_in_Natura_2000_sites.pdf)

PETI Fact-finding visit to Romania (2023): [https://www.europarl.europa.eu/RegData/etudes/BRIE/2023/748893/IPOL\\_BRI\(2023\)748893\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2023/748893/IPOL_BRI(2023)748893_EN.pdf)

Agent Green (2022). Ten methods of theft and reasons for upgrading SUMAL. Available at: [https://www.euronatur.org/fileadmin/docs/Urwald-Kampagne\\_Rumaenien/agent\\_green\\_report\\_ten\\_methods\\_of\\_stealth\\_and\\_ten\\_reasons\\_to\\_upgrade\\_sumal.pdf](https://www.euronatur.org/fileadmin/docs/Urwald-Kampagne_Rumaenien/agent_green_report_ten_methods_of_stealth_and_ten_reasons_to_upgrade_sumal.pdf)

OCCRP (2024): <https://www.occrp.org/en/news/romanias-timber-industry-continues-to-cheat-the-timber-tracing-system>

EIA (2024): <https://eia.org/blog/ikeas-romanian-wood-sourcing-woes-highlight-the-need-for-national-transparent-timber-traceability-systems-across-europe/>

<https://www.eureporter.co/world/romania/2024/05/07/illegal-logging-plagues-romania/>

<https://www.romania-insider.com/der-spiegel-romania-ancient-forests-illegal-loggers-2023>

<https://atmos.earth/bounties-mafias-and-the-climate-cost-of-ikeas-fast-furniture/>

### **Annex 2: Video reports and documentary films regarding illegal logging in Romania**

Channel 4: <https://www.youtube.com/watch?v=LCUbU-tCrMw>

Der Spiegel: <https://www.spiegel.de/wirtschaft/rodung-in-rumaenien-wie-holzraeuber-die-aeltesten-waelder-europas-zerstoeeren-a-d6b0149e-a843-4f91-ae08-6f9afbcf29f7>

DW: <https://www.dw.com/de/das-brutale-gesch%C3%A4ft-der-holzmafia/video-67646368>

Tagesschau: <https://www.tagesschau.de/investigativ/ndr-wdr/holz-mafia-rumaenien-101.html>

ARD: <https://www.ardmediathek.de/video/alpha-doku/das-brutale-geschaeft-der-holzmafia/>

ARTE: <https://www.youtube.com/watch?v=f82gOq79w-U>

Tom Heinemann: <https://tomheinemann.dk/ikea-loves-wood/>

BBC: <https://www.bbc.com/news/world-europe-50287999>

The Guardian: <https://www.theguardian.com/world/2020/jan/08/violence-escalates-as-romania-cracks-down-on-illegal-timber-trade>

Matthias Schickhofer interview with German forester on EUDR administrative burdens: <https://www.youtube.com/watch?v=MNngayXYLG8>

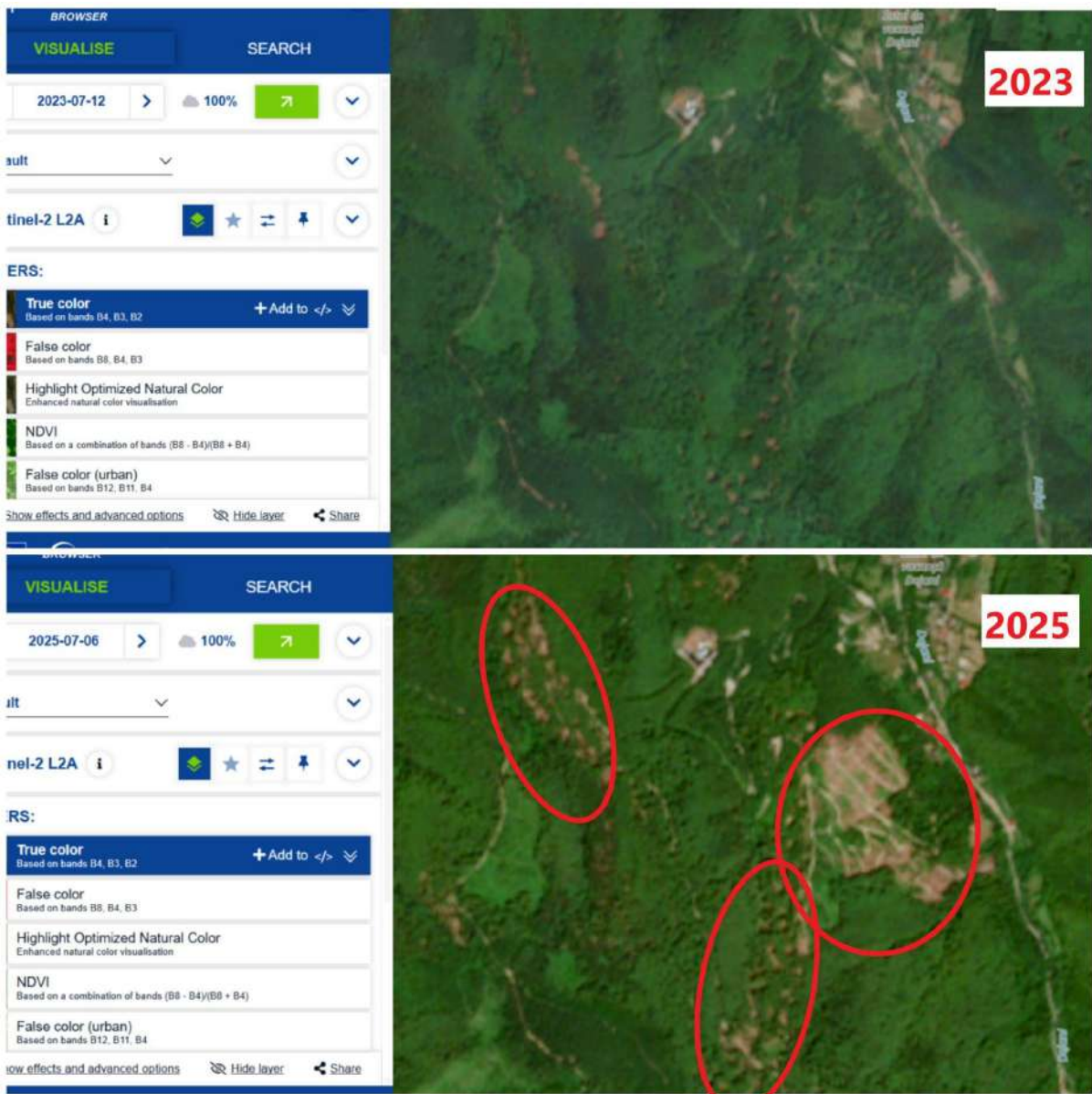
### Annex 3: Case studies from recent forest investigations in Romania

#### Location 1: Dejani, Northern Făgăraș

<b>Location name / GPS location</b>	Dejani, 45°40'02.8"N 24°55'06.1"E
<b>Forest owner/ Administrator</b>	Private forest, RPL OS PĂDURILE FĂGĂRAȘULUI R.A.
<b>Parcel and forest no</b>	60A, UP I Recea
<b>Protected area</b>	Yes, Natura 2000 sites ROSPA0098 and ROSAC0122
<b>Environmental / Appropriate Assessment (AA)</b>	No / Not available online
<b>Type of logging Logging active/inactive</b>	Progressive logging resembling a clearcut
<b>Observations / suspected breaches of law</b>	Logging was done inside two Natura 2000 protected areas very likely without an Environmental / Appropriate Assessment to assess the impact of logging, as required by the <b>Habitats Directive (92/43/EEC)</b> / <b>SEA Directive 2001/42/EC</b> and national legislation ( <b>OUG nr. 57/2007</b> on the regime of protected natural areas, conservation of natural habitats, wild flora and fauna). After this so-called progressive logging, the area resembles a clearcut. According to Romanian legislation, clearcutting a healthy mixed forest is illegal. Logging permit no (APV): 2300165201230



*Drone photo from 21.08.25 showing large scale habitat degradation following recent logging*



Satellite comparison of images taken on 12.07.2023 vs 06.07.2025

## Location 2: Fetești, Suceava

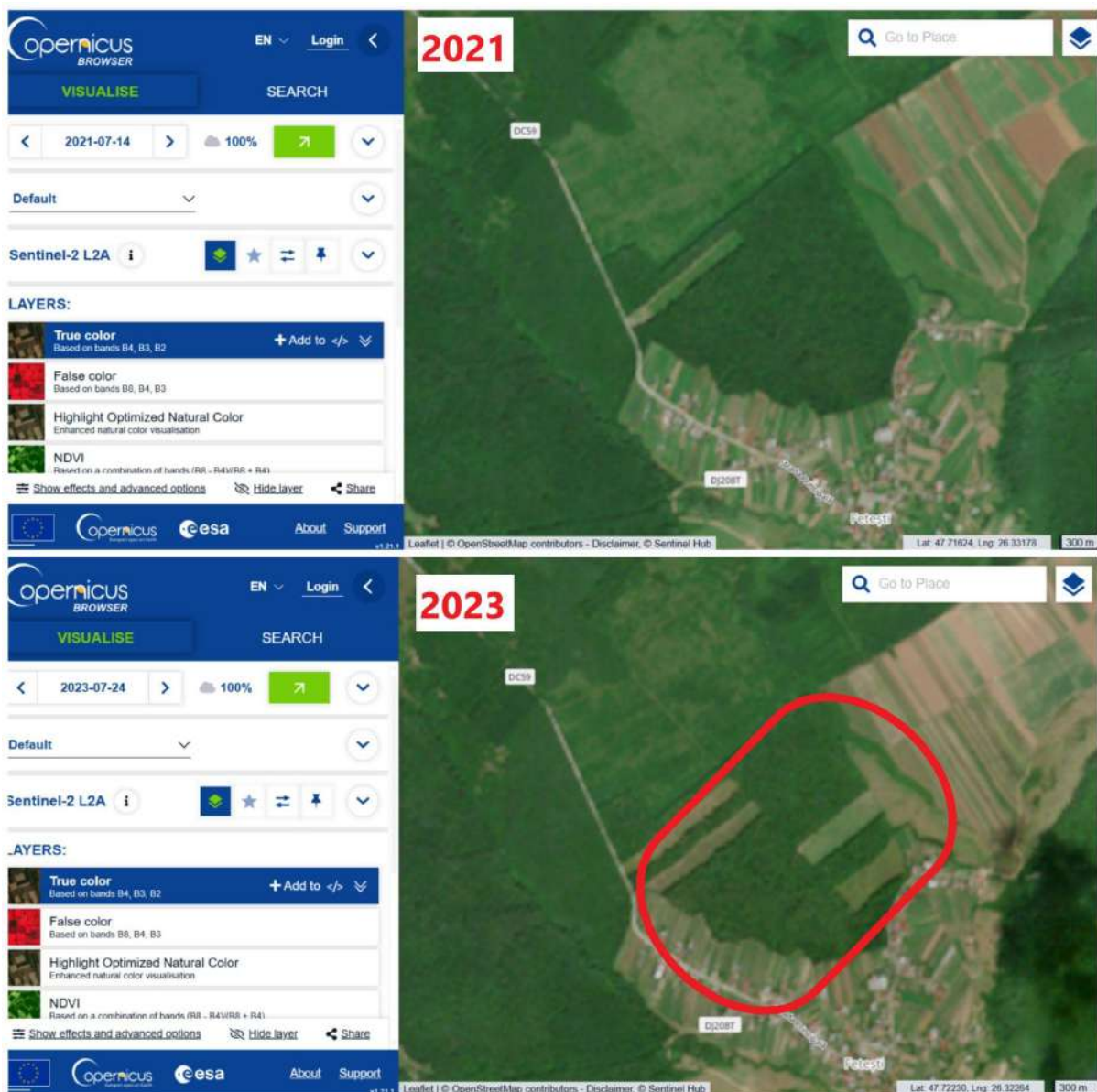
<b>Location name / GPS location</b>	Fetești, 47°42'49.2"N 26°20'08.5"E
<b>Forest owner/ Administrator</b>	Private forest, OS INGKA INVESTMENTS S.R.L.
<b>Parcel and forest no</b>	UA 37, 38, UP XVIII Adâncata
<b>Protected area</b>	No
<b>Environmental / Appropriate Assessment (AA)</b>	No / Not required outside protected areas
<b>Type of logging Logging active/inactive</b>	Clearcuts (2021-2023) followed by replanting 2022 - 2025
<b>Observations / suspected breaches of law</b>	In this location we documented a mixed natural forest dominated by oak, hornbeam, beech, maple and many other species that is being clearcut and replaced by an

oak monoculture. According to Romanian legislation, clearcutting a healthy mixed forest is illegal but the owner (Ingka Investments) is claiming that the forest is of low financial quality and should be replaced by a high value monoculture (oak). The oak is being replanted in plastic tubes and planting is expected to continue for the next few years.

Logging permit no (APV): 2100125303680,  
2200125301470, 2100125302650



*Drone photo of suspected illegal clearcuts in Ingka forest near Fetești, Suceava (2023)*



Satellite comparison of images taken on 14.07.2021 vs 24.07.2023

### Location 3: Maramureş Mountains Natural Park and Natura 2000 site Repedea

<b>Location name / GPS location</b>	47°51'46.26"N 24°23'16.64"E
<b>Forest owner/ Administrator</b>	Private Property, OS Poieni
<b>Parcel and forest no.</b>	Parcels 15, 16, 17a, UP 1
<b>Protected area</b>	Yes, Maramureş Natural Park and ROSAC0124
<b>Environmental / Appropriate Assessment (AA)</b>	No / Not available online at the time of logging
<b>Type of logging Logging active/inactive</b>	Illegal clearcuts masked as Conservation logging, accidental logging
<b>Observations / suspected breaches of law</b>	More than 4000 m <sup>3</sup> have been removed from these parcels in the last few years. We visited this location in 2022 and 2023. On the ground it looks like a clearcut where the entire forest ecosystem has been

	<p>compromised and replaced by grassland, but this massive logging was declared as conservation logging. Potential illegalities include: Massive habitat degradation and loss of forest ecosystems, more wood harvested than declared in writing and non-compliant photos that do not capture the entire load and registration number. Examples of potentially illegal transport permits: AP21015293001506183211221347 AP21015293001206183211191118 AP24001440001900620605091357 Unjustifiably prolonged cuts for APV 2200144002450 which had to be completed according to SUMAL 2.0 on 04/06/2023. Other APV numbers from the area: 2100144003700, 2100144001140, 2300144003220 Very limited public information about the forest management plan.</p>
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*Satellite comparison of images taken on 2020 vs 2022 vs 2024*

**Location 4: Vânători Neamț Natural Park and Natura 2000 site, Boulețul**

<b>Location name / GPS location</b>	47° 5'22.31"N 26° 8'34.06"E
<b>Forest owner/ Administrator</b>	State Property, OS Văratec, NT
<b>Parcel and forest no.</b>	UP 2, 56A
<b>Protected area</b>	Yes, Natural Park Vânători Neamț and Natura 2000 sites ROSAC0270 and ROSPA0107
<b>Environmental / Appropriate Assessment (AA)</b>	No / Not available online at the time of the logging
<b>Type of logging Logging active/inactive</b>	Progressive logging
<b>Observations / suspected breaches of law</b>	Large volumes have been removed here. This was an outstanding old-growth forest, 179 years old (on average) with consistent forest cover (0.7), which

	<p>should have benefited from the double protection of a Natural Park and a Natural 2000 site. Instead, it is being rapidly degraded with progressive logging.</p> <p>Inside this forest we found sporadic multi-century beech trees (&gt;250 years) that were extracted with priority.</p> <p>The exploitation rules and the requirements of the FSC® standard were not respected (soil erosion, impaired regeneration). Specific biodiversity conservation measures by protecting outstanding elements were not respected.</p> <p>Recent cutting marks (August 2024) although the work was officially completed on 31.12.2023.</p> <p>Examples of suspected, under-estimated wood transports:</p> <p>AP23000916002104430504241209 AP23000916001704432804241206 AP23000916000200319706011810</p> <p>Logging permits (APV) numbers: 2100022500680, 2300022500450</p>
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*Satellite comparison of images taken in 2022 vs 2024*



*Ground photo and drone photo taken in 2024*

**Location 5: Ceahlău Mountains Natura 2000 site, Izvorul Muntelui**

<b>Location name / GPS location</b>	46°56'58.71"N 25°59'38.50"E
<b>Forest owner/ Administrator</b>	State Property, OS Bicz, NT
<b>Parcel and forest no</b>	UP 10, 50A
<b>Protected area</b>	Yes, Natura 2000 site ROSPA0129
<b>Environmental / Appropriate Assessment (AA)</b>	No / Not approved at the time of the logging (2022-2023). An EEA was available online as of 09.10.2024
<b>Type of logging Logging active/inactive</b>	Progressive logging, accidental logging
<b>Observations / suspected breaches of law</b>	<p>Over 10,000 m<sup>3</sup>, have been removed here - from a forest 150 years old on average, with only minor interventions in the past and a consistency of 0.6.</p> <p>On the ground we found several breaches of forestry technical norms, Natura 2000 standards, exploitation rules and the requirements of the FSC® standard with extremely serious consequences in the future.</p> <p>Deep, eroded logging roads were present everywhere in these forest parcels, sometimes as deep as 3-4 m, putting the small village of Izvorul Muntelui at risk of mud flooding. The village is located at the base of the forest slope. Multiple unprotected wet areas were found inside the parcel, where trees should not have been logged, according to FSC and Natura 2000 Standards.</p> <p>Logging permits (APV) numbers: 2100020003500, 2300020000790, 2100020005540, 2500020003260, 2100020003400, 2300020004450</p>



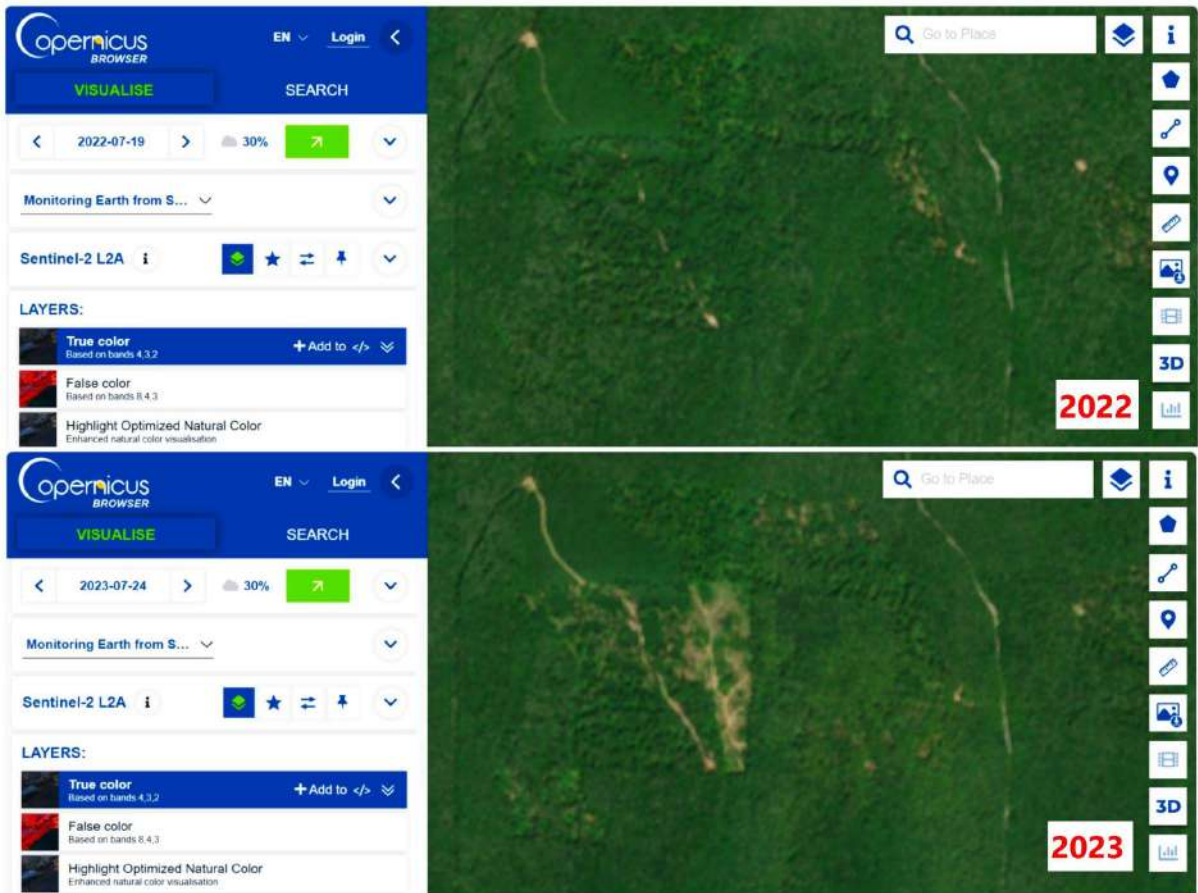
*Satellite comparison of images taken in 2022 vs 2024*



*Ground photo and drone photo taken in 2024*

**Location 6: Popești, Iași**

<b>Location name / GPS location</b>	47°04'31.2"N 27°15'43.9"E
<b>Forest owner/ Administrator</b>	Ingka Investments Forest Assets SRL
<b>Parcel and forest no.</b>	UA 144, 145A, UP X, O.S. Ingka Investments
<b>Protected area</b>	Yes, two Natura 2000 sites: Pădurea Floreanu - Frumușica - Ciurea ROSPA0163, ROSCI01052
<b>Environmental / Appropriate Assessment (AA)</b>	SEA and AA was not available at the time of site visit, after logging had already been conducted, in breach of EU Habitats Directive and national legislation; it was in progress as of 2024 but not yet approved
<b>Type of logging Logging active/inactive</b>	Progressive logging
<b>Observations / suspected breaches of law</b>	<p>Several logging permits (APV) analysed, including:  APV 2200125300050  APV 2200125300520  APV 2200125300770</p> <p>Field investigations and analysis of forest management plan and logging permits revealed several issues:</p> <ul style="list-style-type: none"> <li>- appropriate assessment (AA) not performed before logging</li> <li>- number of allowed interventions was exceeded in parcel 144 (2 instead of 1)</li> <li>- maximum allowed wood volume to be extracted was exceeded in parcels 144 and 145A by a total of 200.50 m<sup>3</sup></li> <li>- poor natural regeneration for oak species biotope trees and dead wood missing</li> <li>- clearcut around water bodies (several ponds)</li> <li>- habitats and threatened species affected</li> <li>- breaches of SUMAL wood traceability system, e.g. several transport notices showed deficiencies such as wood loads not clearly visible and abnormal routes taken</li> <li>- soil degradation including erosion</li> <li>- damage to trees not subject to logging.</li> </ul>



Satellite comparison of images taken in 2022 vs 2023

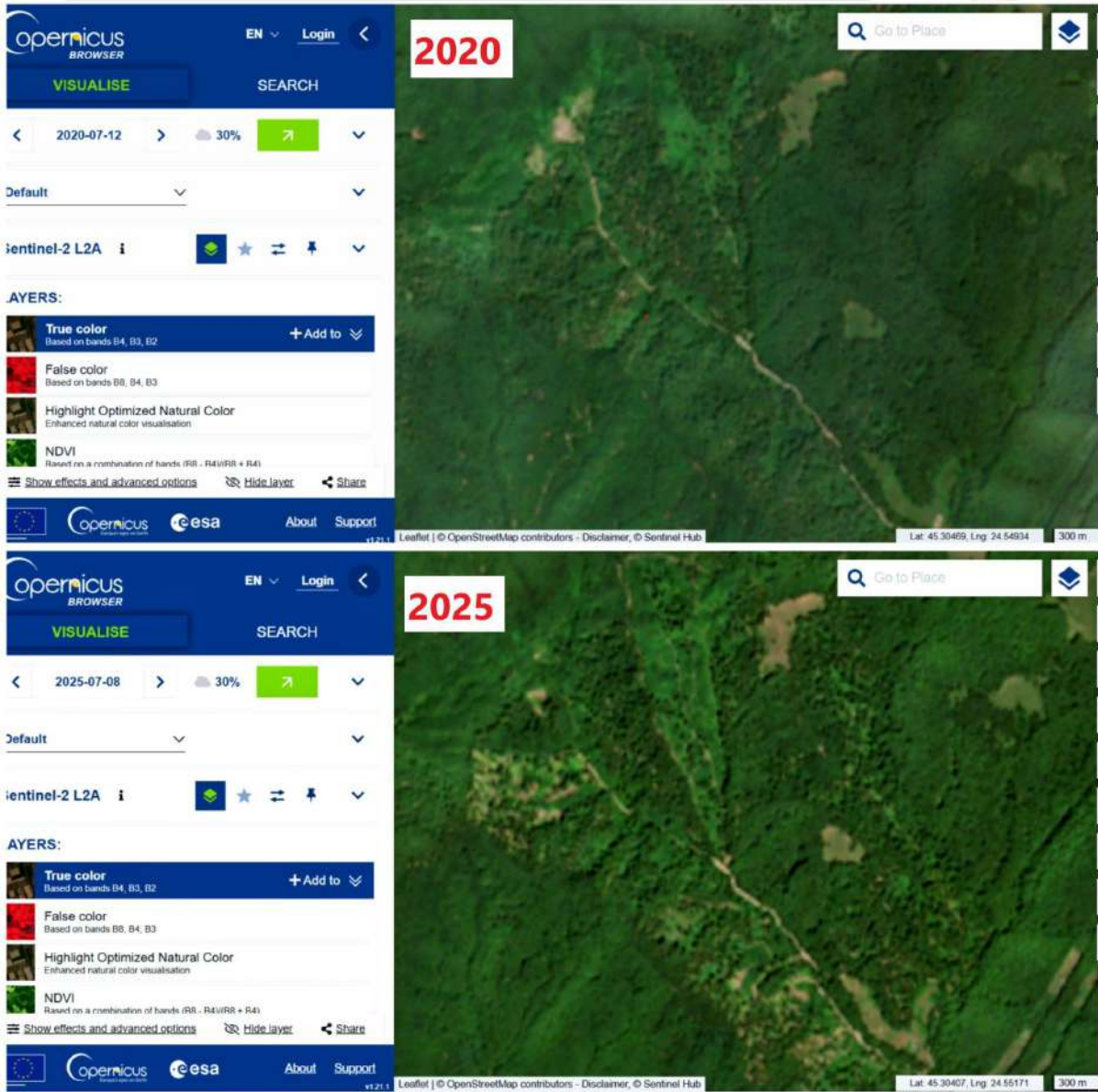


*Drone photo of progressive logging site resembling clearcut near Popești, Iași county (2023)*

#### **Location 7: Cicănești, Argeș**

<b>Location name / GPS location</b>	45°17'52.6"N 24°33'52.7"E
<b>Forest owner/ Administrator</b>	Ingka Investments Forest Assets SRL
<b>Parcel and forest no.</b>	UA 116A, 119A, UP VIII Argeș
<b>Protected area</b>	No but near Valea Vâlsanului Natura 2000 site ROSCI0268
<b>Environmental / Appropriate Assessment (AA)</b>	Not applicable. Not in a protected area
<b>Type of logging Logging active/inactive</b>	Close to nature and progressive logging
<b>Observations / suspected breaches of law</b>	Several logging permits (APVs) analysed including: APV 2200125301240 APV 2000125300051 APV 2100125300150 APV 2200125301230 Field investigations and analysis of forest management plan and logging permits revealed: - incorrect application of progressive logging with visible degradation of forest ecosystems - due to classification as protection forests, these forests should have been put in category

	<p>of moderate or no interventions</p> <ul style="list-style-type: none"> <li>- number of interventions foreseen by FMP has been exceeded in one parcel</li> <li>- soil degradation caused by the use of heavy machinery in periods of heavy rainfall;</li> <li>- severe soil erosion up to 3-4m deep traces of machinery passing through the stream</li> <li>- no ARN works observed in the field</li> <li>- biodiversity trees and dead wood were not preserved</li> <li>- poor, unmaintained or missing forestry markings</li> <li>- periodic pollution of the creek due to silt carried by torrents on eroded roads.</li> </ul>
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Satellite comparison of images taken in 2020 vs 2025

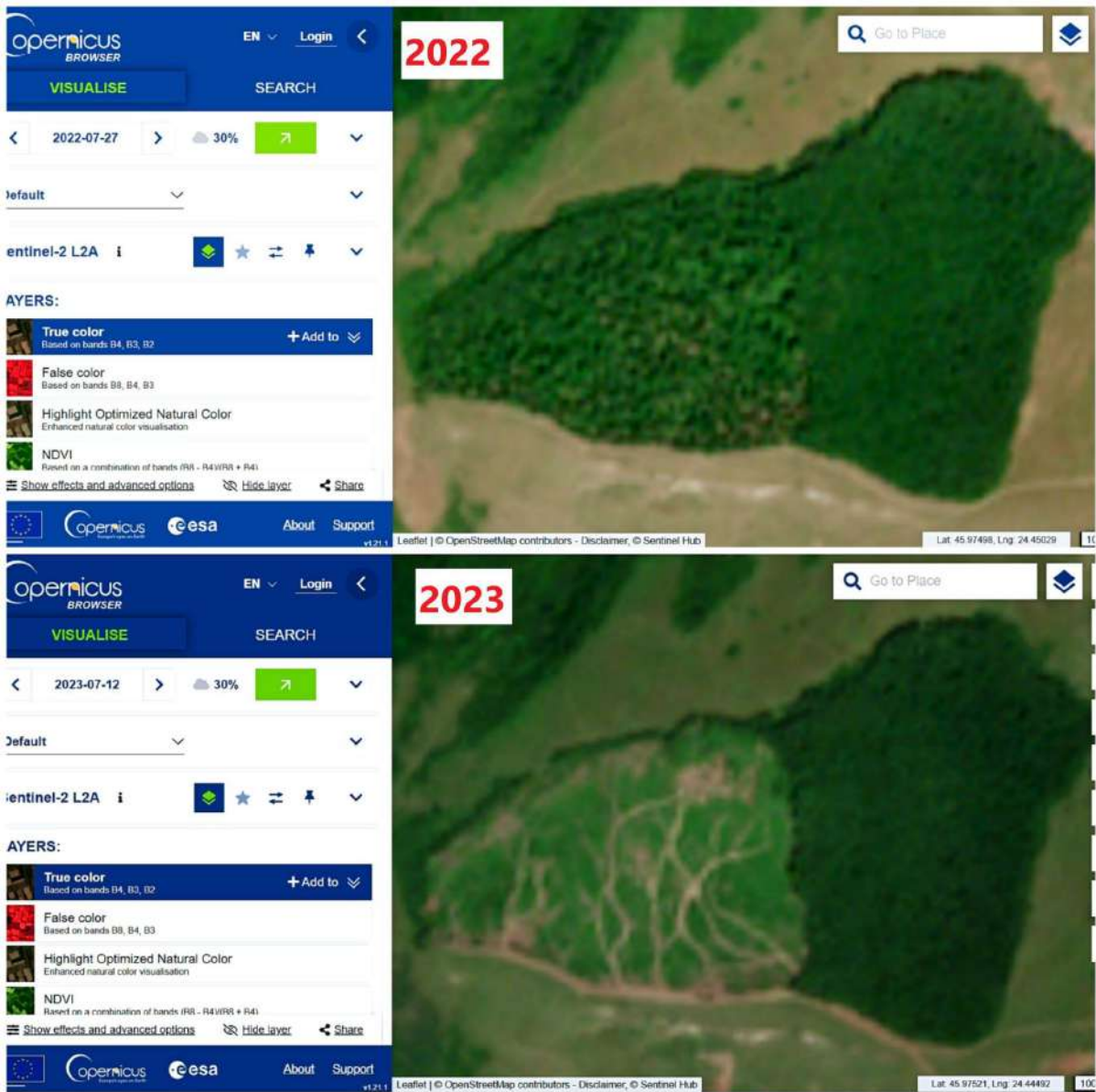


*Drone photo of Ingka-owned forest located in Cicănești, Argeș. Degraded forest parcels (2024)*

**Location 8: Vecerd, Sibiu**

<b>Location name / GPS location</b>	45°58'14.8"N 24°26'28.1"E
<b>Forest owner/ Administrator</b>	State Property, OS Agnita
<b>Parcel and forest no.</b>	UA 40c, UP I OS Agnita
<b>Protected area</b>	Yes, Podișul Hârtibaciului Natura 2000 site ROSPA0099
<b>Environmental / Appropriate Assessment (AA)</b>	Not available at the time of the site visit (2023), in breach of EU Habitats Directive
<b>Type of logging Logging active/inactive</b>	Illegal clear cut masked as Progressive logging
<b>Observations / suspected breaches of law</b>	<p>Here we investigated another illegal clear cut in a mixed forest dominated by oak trees, inside a Natura 2000 site.</p> <p>Field investigations and analysis of forest management plan and logging permits revealed:</p> <ul style="list-style-type: none"> <li>- appropriate assessment (AA) was not performed before logging in breach of Habitats Directive and national legislation;</li> <li>- conditions of exploitation specific to the protected natural area ROSPA0099 Podișul Hârtibaciului were not respected;</li> <li>- visible degradation of habitats typically associated with clearcuts, in breach of EU and national law;</li> </ul>

	<ul style="list-style-type: none"><li>- progressive logging was incorrectly applied because it did not result in natural regeneration at the required values;</li><li>- soil erosion and deterioration caused by the use of heavy machinery in periods of rainfall, in breach of national law;</li><li>- logging permit APV 2200069101240 was reopened in SUMAL five months after the expiry of the authorised exploitation period;</li><li>- no biodiversity trees and dead wood were left after logging;</li><li>- non-compliant transport notices issued from logging sites</li><li>- no RNA works in the second half of past year observed;</li><li>- damaged trees adjacent to logging sites and evacuation routes;</li><li>- access paths used to collect wood have not been levelled;</li><li>- poor landscape markings, missing silvicultural markings.</li></ul>
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Satellite comparison of images taken in 2022 vs 2023



*Drone photo of cleared forest area in Natura 2000 protected area and biodiversity hotspot Podișul Hârtibaciului, Vecerd, Sibiu (2023)*

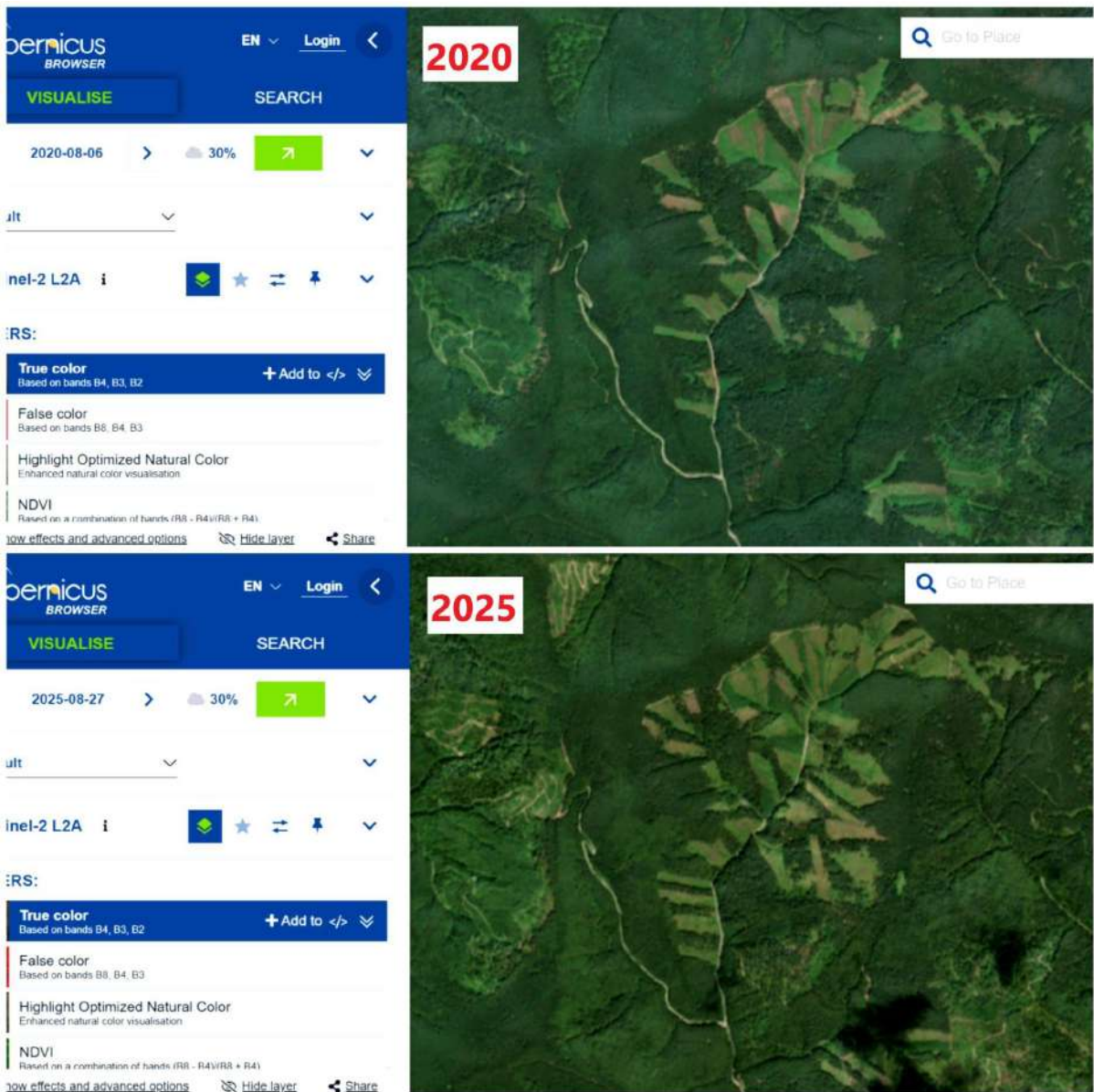
**Location 9: Bârsa Valley, Southern Făgăraș Mountains**

<b>GPS location</b>	45°38'04.3"N 25°06'41.9"E
<b>Forest owner/ Administrator</b>	Both State and Private forest/ OS Brasov and Regia Publica Locala a Padurilor Piatra Craiului RA
<b>Parcel and forest no</b>	Parcels 330 - 339 UPII OS Brasov, ua 44a, 45b, 46a and 63b, UPI Poiana Marului, R P L P Piatra Craiului RA
<b>Protected area</b>	Yes, ROSAC0122
<b>Environmental / Appropriate Assessment (AA)</b>	Yes, but the current appropriate assessment was only done on 07.04.2024, when logging was already done
<b>Type of logging Logging active/inactive</b>	Multiple clearcuts, progressive and accidental logging
<b>Observations / suspected breaches of law</b>	Large areas affected by recent clearcuts, over 100 ha, over the last 5 years, in the absence of any environmental or appropriate assessment, resulting in extreme and large-scale environmental degradation. The local river (Bârsa) was entirely blocked by leftover wood deposited in the water resulting in substantial water pollution.

Drone photos and video showed large areas impacted by both recent and older clearcuts, resulting in a severely fragmented forest habitat. There is very poor and only partial natural regeneration of the forest.

Video footage shows logging roads at the top of a mountain on a steep slope where normally building logging roads is legally prohibited (on slopes greater than 35 degrees).

Some of the logging permits (APV) numbers:  
 2100168701020, 2300168700390, 2300168700380,  
 2300168700090, 2100168701030, 2100168700220,  
 2100159700240, 2300159701000.



Satellite comparison of images taken in 2020 vs 2025

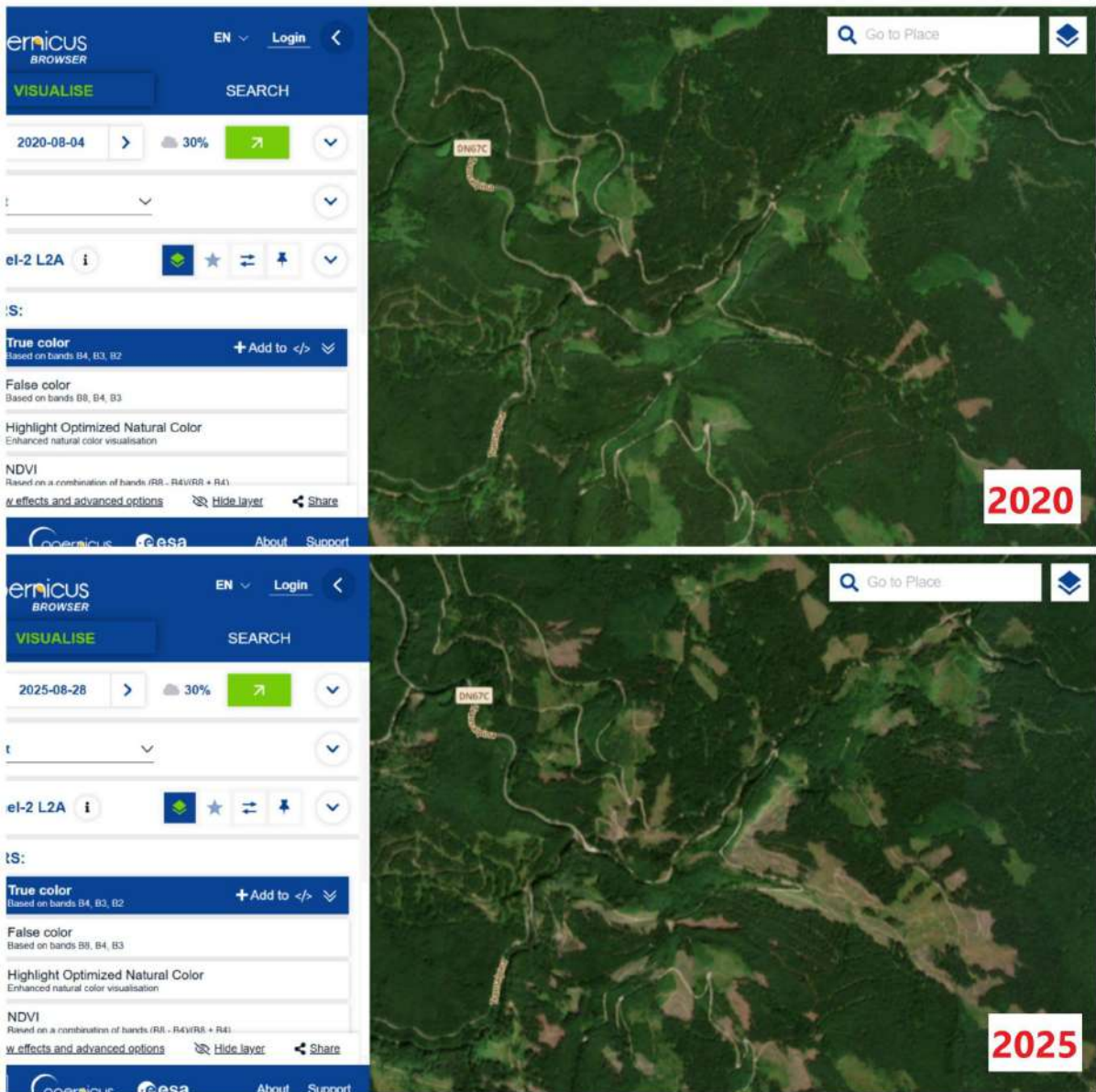


*(Left photo) fully loaded truck leaving Bârsa Valley; (right photo) clearcuts on Upper Bârsa Valley in 2021*

**Location 10: Miercurea Sibiului**

<b>Location name / GPS location</b>	45°37'49.1"N 23°39'06.2"E
<b>Forest owner/ Administrator</b>	State forest / OS Miercurea Sibiului
<b>Parcel and forest no</b>	26 A; 26 B; 29 A; 37 A; 28 B; 27 A; 38 C; 26 D UP4, and many others in the vicinity.
<b>Protected area</b>	Yes, ROSPA0043 and ROSAC0085
<b>Environmental / Appropriate Assessment (AA)</b>	Not available online, but likely made in 2021, after logging had taken place
<b>Type of logging Logging active/inactive</b>	Illegal clearcuts masked as progressive and accidental logging
<b>Observations / suspected breaches of law</b>	<p>We have observed several large clearcuts masked as progressive or accidental logging in official documents. Since 2024, clearcuts are banned in Natura 2000 sites, but here most of the damage has already been done prior to 2024.</p> <p>Logging continues in these sites with progressive, conservation and accidental logging. Between these cuts there are no corridors or bands of trees left, which leads to habitat fragmentation with large areas devoid of trees.</p> <p>In most of these clearcuts we could only observe grasses and small bushes growing, with only small traces of replanting. Due to the large size of these areas, natural regeneration is very slow leading to several blowdowns, which explains the number of accidental cuts and leads to further habitat</p>

	<p>degradation, all consequences of defective forest management.</p> <p>Most of the forests and logging roads here are on steep slopes and ravines of over 40 %.</p> <p>The forest in this part of the site is privately owned, therefore we do not have access to data concerning the age and structure of the forest.</p> <p>Some of the logging permits from this area:</p> <p>2100071100690 - Progressive (punere în lumină, racordare), 1069 mc</p> <p>2100071100600 - Progressive (punere în lumină, racordare), 449 mc</p> <p>2000071100091 - Progressive (punere în lumină), 127 mc</p> <p>2200071100970 – Accidental logging – 283 mc</p> <p>2100071100450 – Accidental logging – 219 mc</p> <p>2100071101410 – Accidental logging – 351 mc</p>
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Satellite comparison of images taken in 2020 vs 2025



*Drone photo of large clearcuts masked as progressive logging in 2022*