

# **REVIEW AND REVISION OF FSC CENTRALISED AND NATIONAL RISK ASSESSMENT FOR ROMANIA**

## **PUBLIC CONSULTATION REPORT**

29.11.2024



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## 1. INTRODUCTION

The purpose of the evaluation process is to review and revise the <FSC-CNRA-RO V1-0 EN - Centralised National Risk Assessment for Romania> (CNRA, 2017) using the <FSC-PRO-60-006b V2-0 Risk Assessment Framework>.

- For Romania, the national and centralized risk assessment in wood supply was carried out in 2017 and is available at <https://connect.fsc.org/document-centre/documents/resource/291> .
- The evaluation process involves determining the risks for the 64 indicators in the FSC-PRO-60-006b V2-0 Risk Assessment Framework available at: <https://connect.fsc.org/document-centre/documents/resource/377> .
- The evaluation process is conducted by a team of experts from Transylvania University of Brasov selected based on a bidding process.
- A first draft was developed by the six team members and considering the inputs of additional 16 experts in a working group meeting held in 17-18<sup>th</sup> of September 2024 in Brasov.
- The first draft has been submitted for a revision by FSC on 20th of September 2024.
- The version for public consultation integrates the revisions received from FSC on 11th of October 2024 and it is available on the webpage of the project: [https://evaluarerisc.dialogforestier.ro/wp-content/uploads/2024/10/CNRA\\_Romania\\_2024\\_V1\\_public\\_consultation.pdf](https://evaluarerisc.dialogforestier.ro/wp-content/uploads/2024/10/CNRA_Romania_2024_V1_public_consultation.pdf)
- The Risk Assessment Framework requires one round of focused consultation on the draft risk assessment lasting 30 days.
- The version V1- Document for public consultation) was initially in the public consultation process from 21st of October 2024 until 19th of November 2024, with an additional extension until 26<sup>th</sup> of November 2024.
- The focus consultation target stakeholders identified according to the groups listed in Annex 1 of the Risk Assessment Framework.
- A second draft will be developed based on the input from stakeholder consultation, and will be submitted to the FSC reviewer for review prior submission to the decision-making body.

## THE CURRENT REPORT PRESENTS THE CONDUCT OF THE PUBLIC CONSULTATION PROCESS AND ITS RESULTS.



## 2. CONDUCT OF THE PUBLIC CONSULTATION PROCESS

### 2.1. Selection of stakeholders

Annex 1 of the revised FSC-PRO-60-006b Risk assessment framework has been used to identify the stakeholders. The list was supplemented with other active stakeholders identified from the consultation process for the elaboration of the National Forest Strategy 2030, stakeholders participating in the consultation process for the Forest Code, and stakeholders from the FSC network.

The list was consulted with national FSC representatives that contributed to the list of stakeholders. The final list is presented in Annex 1 of the report. In the end, 187 stakeholders balancing the categories identified in Annex 1 and 870 FSC certified companies (as suggested by National FSC representatives) were notified about the process.

Moreover, the public platform used for the consultation process and the outreach strategies allowed the registration in the consultation process of any interested party, thus not limiting the inputs to the initial list of stakeholders.

### 2.2. Consultation platform and stakeholders' outreach

In order to assure the transparency of the process, a dedicated web page was designed for the CNRA Romania 2024: <https://evaluarerisc.dialogforestier.ro/>



Procesul de consultare publică

Universitatea Transilvania din Braşov (UNITBV) invită toţi factorii interesaţi din sectorul forestier să participe la a procesul de consultare publică privind Revizuirea Evaluării Centralizate şi Naţionale FSC a Riscurilor pentru România în Aprovizionarea cu Lemn.

Informaţiile supuse consultării se găsesc în schiţa documentului original în limba engleză.

[Raport de analiză a riscurilor](#)

Pentru a facilita analizarea informaţiilor cuprinse în raport şi colectarea poziţiei factorilor interesaţi, echipa proiectului a pregătit un chestionar special de consultare, în limba română, prin care vă puteţi exprima comentariile şi sugestiile. Traducerea este realizată automatizat, raportul în limba engleză indicat mai sus constituind referinţa oficială.

Chestionarul poate fi accesat după înscrierea dumneavoastră în procesul de consultare.

[Formular de înscriere în procesul de consultare](#)

Vom putea consemna opiniile dumneavoastră până cel târziu în 19 noiembrie 2024, ora 13.00.

Vă mulţumim anticipat pentru participare.

Cu cordialitate,  
Echipa proiectului

Figure 1. Web platform for the public consultation process CNRA 2024

The web page describes the process, presents the document for public consultation and has a link for the form for the public consultation process (figure 1).

The registration form was available in Romanian and English and every interested party could register in the process (figure 2).



Language: English - English [Change the language](#)

You may register for this survey if you wish to take part.  
Enter your details below, and an email containing the link to participate in this survey will be sent immediately.

\* First name:

\* Last name:

\* Email address:

Fields marked with an asterisk are mandatory.

[Continue](#)

Figure 2. Registration form

The document for public consultation as well as the registration form was also publicly available on:

- The FSC international consultation portal: <https://consultation-platform.fsc.org/en/consultations>

The screenshot shows the FSC Consultation Platform interface. At the top, there is a navigation bar with 'CONSULTATIONS' and 'ABOUT' tabs, and buttons for 'REGISTER' and 'LOG IN'. Below the navigation bar, the 'CONSULTATIONS' section displays two active consultations:

- CONSULTATION ON FSC RISK ASSESSMENT FOR ROMANIA**: The FSC-CNRA-RO V1-0 EN - Centralised National Risk Assessment for Romania is being revised using the FSC-PRO-60-006b V2-0 Risk Assessment Framework and the first draft is now undergoing consultation. The consultation and the development of the FSC Risk Assessment for Roma... Created by Forest Management Program. Closing date: 19th November 2024 23:59:59 CET. [PARTICIPATE](#)
- [ENGLISH/SPANISH] PUBLIC CONSULTATION ON FSC'S GENERAL ACCREDITATION STANDARD INCLUDING CERTIFICATION TRANSFER PROCEDURE AND AUDITOR TRAINING PROGRAMME**: Consultation on revision of FSC's General Accreditation Standard, Certification Transfer Procedure and Procedure for Auditor Training Programme is open from 23 September 2024 to 21 November 2024 for your input. Created by Farhan Butt. Closing date: 21st November 2024 23:59:59 CET. [PARTICIPATE](#)

Figure 3. Presentation of the process on FSC international platform

- LinkedIn

The screenshot shows a LinkedIn post by Halalisan Aureliu-Florin, a local expert on forestry/forest certification FM and CoG... The post discusses the review and revision of the FSC Centralised and National Risk Assessment for Romania (CNRA ROMANIA 2024). It mentions a public consultation on the draft version and provides a link to the registration form: <https://lnkd.in/dMYzgt8>. The post also includes a link to the document: <https://lnkd.in/dJxfmy4w>. Below the text, there are two images: one titled 'Designation of Risks' and another titled 'Types of Risk'.



### 2.3. Notification of stakeholders

All stakeholders identified in Annex 1 (1057) were notified via email on the 21<sup>st</sup> of October 2024 and have been provided with instruction on the registration process, the documents for evaluation and the use of comments forms. The consultation was opened for 30 days until 19 of November 2024.

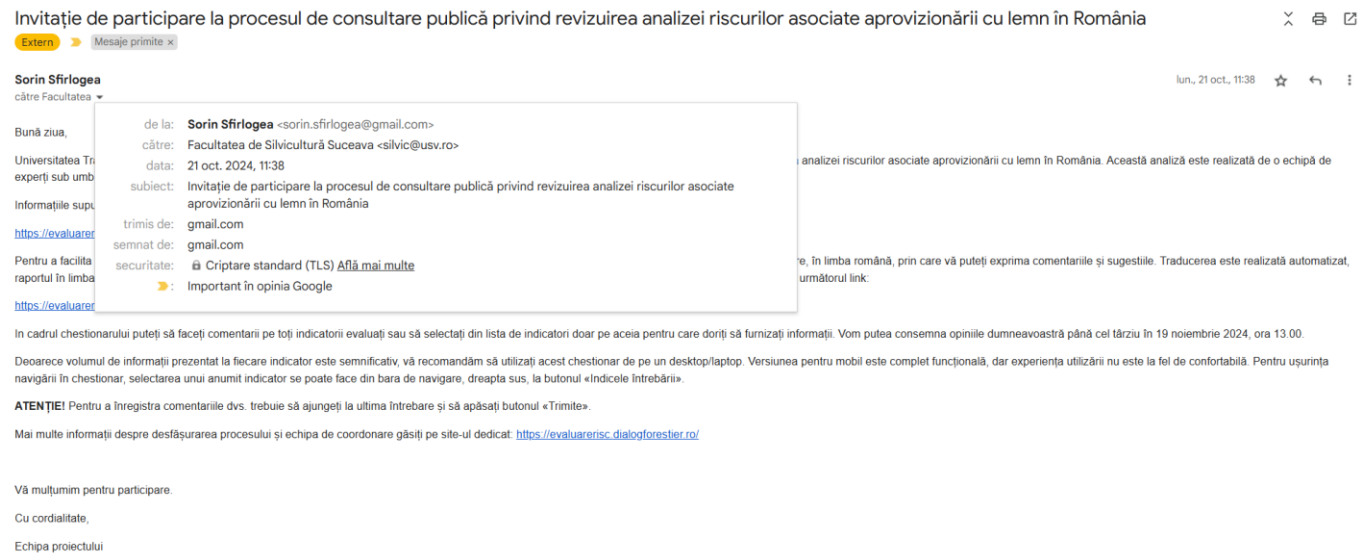


Figure 4. Notification email sent to stakeholders on 21<sup>st</sup> of October 2024

A first reminder was submitted by the project coordinator after one week from the start of the consultation process:



Figure 5. Notification email sent to stakeholders on 28<sup>th</sup> of October 2024



The last reminder was sent by the project coordinator 18 days after the start to the consultation process:

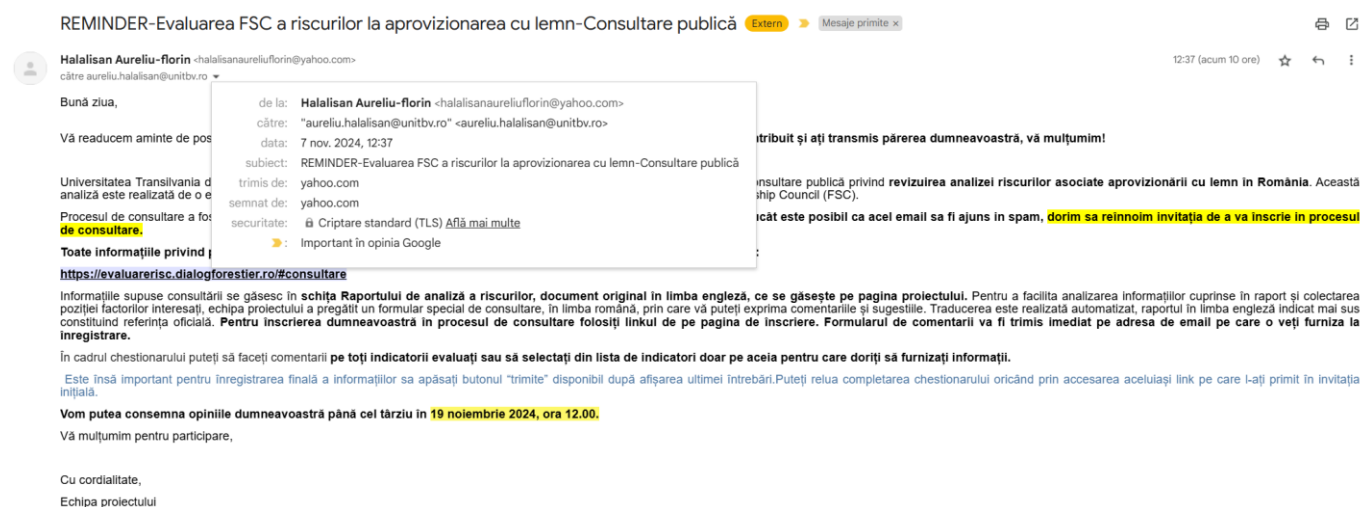


Figure 6. Notification email sent to stakeholders on 7<sup>th</sup> of November 2024

At the request of the National FSC body following concerns of stakeholders the public consultation process has been extended until 26<sup>th</sup> of November 2024. This has been displayed on the dedicated page as well as on FSC international consultation page.



Figure 7. Extension of the public consultation process until 26<sup>th</sup> of November 2024



## 2.4. Comments form

All stakeholders registered in the consultation process received an email with a link to the consultation form. The consultation form was designed bilingual thus allowing comments either in English or in Romanian.

The comment form had the following structure:

- An indication on how to navigate in the questionnaire, to save and to submit the responses
- General identification data of the respondents: answers provided in the name of an organization or as an expert
- The confidentiality level when displaying the results
- The agreement of the stakeholder to be contacted for additional details on the comments provided

Additional info

Because the amount of information presented under each indicator is significant, we recommend using this questionnaire from a desktop/laptop. The mobile version is fully functional, but the user experience is not as comfortable. For ease of navigation in the questionnaire, the selection of a particular indicator can be made from the navigation bar, top right, under the "Question Index" button.

**WARNING!** In order to record the data you need to get to the last question and press the "Submit" button.

\* I will provide input as

Choose one of the following answers

☒ Individual expert

☐ In the name of an organization

\* I agree to be contacted by the expert team via the provided email if they need clarification on the inputs I provided.

☒ Yes ☐ No

\* Before fill in the form please select your preferences for the display of your answers in the public consultation report/ revised version of CNRA Romania 2024.

Choose one of the following answers

☒ The responses will be treated confidentially by the working group, and no references to my name/organization name should be displayed

☐ The working group can make references to the name (for expert inputs) or organization in the display of the questionnaire

- Geopolitical scale assessment: allowed participants to argument if a sub-national scale should be used for the assessment

### Geopolitical scale assessment

Since in Romania the legal requirements are generally applicable at the national level the geopolitical scale for the evaluation is designed at the country level.

As explained in the country overview, the Romanian legal system is highly normative and applies unitary regardless of the type of ownership. This implies also that the technical norms imposed to be used for e.g. afforestation, silviculture, forest protection etc take into consideration the different forest ecological groups (e.g. address variations in geography, climate, forest types). Moreover, the enforcement of the legislation, is performed unitary at the national level under the umbrella of the National Forest Guard (established in 2023). This has been acknowledged by the 2017 CNRA evaluation, and other independent assessments (WWF, 2024) and there is no additional evidence that different historical or administrative regions have different forest management practices.

Do you agree with the fact that the analysis is conducted at the national scale?

☒ Yes ☐ No

What sub-national scale needs to be differentiated and based on what arguments and criteria?

Previous

Next



Considering the large number of indicators, the participants had the possibility to select the specific indicators they want to assess from the full list of indicators

Assessment for Romania (CNRA ROMANIA 2024)
Resume later
Question index

Additional info
Geopolitical scale assessment
01. Land tenure rights are secured and registered according to legal requirements
02. Land management rights are in place and registered according to legal requirements.
03. Forest concession licenses are in place and are issued and registered according to legal requirements
04. Harvesting permits are in place and are issued and registered according to legal requirements
05. Legal requirements for land-use and management planning are complied with
06. Legal requirements for payment of royalties, land/area taxes and fees are complied with
07. Legal requirements for payment of value-added taxes and/or other sales taxes are complied with
01. Land tenure rights are secured and registered according to legal requirements
09. Legal requirements for payment of trade and/or export taxes and fees are complied with
10. Legal requirements related to corruption, including bribery, fraud and conflict of interest, are complied with
11. All forms of bribery and corruption are avoided
12. Data and document falsification do not occur
13. Legal requirements for management activities and related operational requirements are complied with
14. Development and maintenance of infrastructure associated with management activities comply with applicable codes and legal requirements for the protection of environmental values
15. Development and maintenance of infrastructure associated with management activities is done in a way that minimises adverse impacts on environmental values
16. Legal requirements related to biodiversity conservation, protected sites, and the protection of endemic, rare, threatened, or endangered species and their habitats are complied with
17. Legal requirements relating to the harvesting, collection, and trade of CITES species are complied with
18. The volume and impacts of waste from management activities comply with legal requirements, and are managed and minimised
19. Pollution resulting from management activities comply with legal requirements, and is controlled and minimised
20. Water resources are protected and used responsibly in compliance with legal requirements, and with the aim of ensuring long-term viability
21. Negative impacts on soils from management activities are minimised, and comply with legal requirements

## Indicator assessment

For each indicator, the stakeholders had all the information included in the CNRA 2024: the description of the risk thresholds, risk conclusion, sources types, short description of the risk, long description of risks/issue, legislation, description of legal requirements, limitation of sources and mitigation measures (in English and Romanian, depending on the selection of language)

For each indicator, stakeholders had the following questions available to assess the evaluation process:

- Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized? ☐ Yes/ ☐ No/ If not – What arguments/references/ evidences can you provide for changing the risk conclusion?
- Do you consider that the sources types (risk is negligible/non-negligible for all sources types) for this indicator are correctly identified?
  - ☐ Yes, No, If not – What source types can you suggest for assessing the risk for indicator and based on what arguments/evidences/references?
- For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?
  - ☐ Yes, mitigation measures for non-negligible indicators are adequate
  - ☐ No, mitigation measures for non-negligible indicators are not adequate
  - If not – What measures can you suggest to be applicable for mitigating the risk for this indicator?
  - ☐ No need for mitigation measures, as I consider the risk as being negligible
- Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources)



## 24. The use, application, storage, and disposal of chemicals in management activities addresses the protection of the environment and human health and safety and complies with legal requirements

### Risk Thresholds

- 24. 1. Identified laws are not consistently upheld by all entities, are often ignored, are not enforced by relevant authorities, or any combination thereof;
- 24. 2. Violations of identified laws are not efficiently followed up on by the relevant entities;
- 24. 3. Violations of identified laws are not followed up by preventive actions taken by the relevant entities;
- 24. 4. Applicable legislation for the area under assessment contradicts indicator requirement(s);
- 24. 5. Evidence indicates widespread or systematic violation of requirements covered under this indicator.

### Risk conclusion

Negligible risk

### Source types

all sources types

### Short description of risk

The management of chemicals in the forest sector is regulated and there are no evidences of non-compliance with the existing regulations

### Long description of issue/risk

The use, application, storage, and disposal of chemicals in the forest sector is regulated by general laws (L35, L43 and L44). Specifically, the use of pesticides in forest management activities has been increasingly being restricted by the adoption of biological agents of control. Existing data from Labour inspectorates (Ry) show that the level of accidents in the production and use of chemical agents has a low incidence (0,79 in 2023). Therefore, the risk for this indicator is considered as negligible.

### Legislation

Law No. 319/2006, on work safety and health, Government Decision No. 1,218 of September 6, 2006, regarding the establishment of minimum safety and health requirements for ensuring protection for workers against risks related to the presence of chemical agents, Regulation (EC) No. 1907/2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC

### Description of legal requirements

The legal requirements are generally addressed by the specific law on The Occupational Health and Safety Act (L32) but also by specific laws on the use, application, storage, and disposal of chemicals (L43 and L44). The REACH regulation (L44) establishes the minimum requirements for the protection of workers against risks to their safety and health, which originate or may originate from the effects of chemical agents present at the workplace or as a result of any professional activity involving chemical agents. The L43 decision establishes the minimum requirements for the protection of workers against risks for their security and health, which originate or may originate from the effects of chemical agents present at the workplace or as a result of any professional activity involving chemical agents. Failure to comply with occupational health and safety regulations regarding manufacturing, transporting, storing, handling or using dangerous chemical substances or preparations and the resulting waste is punished with a fine from 5.000 lei (approx. 1000 euro) to 10.000 lei. The controlling responsibilities are shared between the Labour Inspectorate (for health and safety issues) and Environmental Guard (on the use and application of chemicals).

### Limitations of Sources

The data provided by the Labour inspectorate on controlling activities related to the monitoring the implementation of legal provisions regarding ensuring the safety and health of workers exposed to dangerous chemical agents (R46) are not specifically detailed for the forest sector; for 2024 only 15 out of 324 entities controlled resulted in fines thus showing a general low incident of failure to implement the legal provisions.

Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized



Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?



For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?

Choose one of the following answers

- ☐ Yes, mitigation measures for non-negligible indicators are adequate
- ☐ No need for mitigation measures, as I consider the risk as being negligible
- ☐ No, mitigation measures for non-negligible indicators are not adequate

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).



### 3. RESULTS OF THE PUBLIC CONSULTATION PROCESS

#### 3.1. Response rate

According to the data recorded in the platform, 56 stakeholders registered in the public consultation process. The distribution of stakeholders according to their inputs provided is as following:

Interaction on the platform	#
Submitted answers recorded in the platform	28
Partial answers – questionnaire not finalized	15
Registered in the platform with inputs send by email	2
Registered in the platform with no inputs	11
<b>Total</b>	<b>56</b>

Two NGOs registered in the platform but have send their answers via emails:

- Asociația Atitude (General comments - Annex 2)
- WWF Romania (indicator-based comments integrated in the text)

Additional to those stakeholders registered in the platform, the project team has contacted and received official positions on indicators 55 and 57 from:

- National Forest Guard (Annex 3)
- National Forest Administration RNP-Romsilva (Annex 4)

In the end, the quantification of the results of the public consultation is done for the 43 stakeholders providing full or partial responses in the consultation platform, while the 11 stakeholders providing no inputs were removed from the quantitative analysis. The responses received by emails are analyzed from a qualitative perspective when referred to a specific indicator.

#### 3.2. Respondents profile

- The received responses were equally provided in the name of organizations as well as individual experts.


I will provide input:	#
In the name of an organization	20
Individual expert	23
<b>Total consultation platform</b>	<b>43</b>
<b>Organizations (emails)</b>	<b>4</b>
<b>Total responses</b>	<b>47</b>

- The following organizations provide inputs:

- 1 A.N.A.N.P. (Agenția Națională pentru Arie Naturale Protejate)
- 2 Asociația Administratorilor de Paduri
- 3 Asociația ALIANȚĂ PENTRU PĂDURE
- 4 Asociația Composesorala "Vorțana" Vorța, Hunedoara
- 5 Baza Experimentală Caransebeș
- 6 FSC Germany
- 7 FSC Romania
- 8 fundatia pentru cultura si educatie ecologista ECOTOP
- 9 Garda Forestieră Națională
- 10 Grupul pentru Dialog Forestier
- 11 IKEA PURCHASING SERVICES ROMANIA
- 12 INCDS Marin Dracea SCDEP Pitesti
- 13 JIFFY PACKAGING SA



14	Kronospan Trading SRL
15	Regia Publica Locala Ocolul Silvic Cindrel R.A. Cristian - Sibiu
16	RETRO COMPROD SRL
17	RNP Romsilva
18	RNP ROMSILVA - DS Arad
19	S.C. SILVANIA INTERNATIONAL PROD S.R.L.
20	Tornator SRL
<hr/>	
21	WWF Romania
22	Asociatia Atitude
23	National Forest Guard
24	National Forest Administration RNP-Romsilva

 The confidentiality level of the information provided:

Select your preferences for the display of your answers in the public consultation report/ revised version of CNRA Romania 2024.	#
The responses will be treated confidentially by the working group, and no references to my name/organization name should be displayed	25
The working group can make references to the name (for expert inputs) or organization in the display of the questionnaire	18
<b>Total</b>	<b>43</b>

**Note:** the responses provided in the Romanian language are automatically translated using google translate. The project team will consider the original version of the comments when assessing the inputs.

### 3.3. Assessing the acceptance of the Geopolitical scale

 Feedback from public consultation

Do you agree with the fact that the analysis is conducted at the national scale?	#
N/A	1
Yes	42
<b>Total general</b>	<b>43</b>

What sub-national scale needs to be differentiated and based on what arguments and criteria?	#
No inputs	43
<b>Total general</b>	<b>43</b>

- ☐ The stakeholders' opinion is fully in favor of selecting the national scale for the CNRA 2024 analysis
- ☐ There are no additional inputs that can lead to changing the scale of the assessment



### 3.4. Analyzing stakeholders' feedback for each indicator, including the risk designation and mitigation measures

Indicator category: Land Use and Management

Risk indicator	01. Land tenure rights are secured and registered according to legal requirements.
Risk conclusion	Negligible risk
Source types	all source types
Risk threshold	
Short description of risks	The legislative and institutional changes in the last years (Forest Code, SUMAL 2.0) have reduced the risk of sourcing wood in violation of property rights, even in the case of fragmented ownership or vegetation outside forest fund.

#### Feedback from public consultation

Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized	#
N/A	6
No	4
Yes	33
<b>Total</b>	<b>43</b>

What arguments / references / evidences can you provide for changing the risk conclusion?	Respondent	#
[Formele asociative nu au legislație specifică, nu sunt încadrate juridic corect și sunt izvor de litigii atât pentru cei din interiorul acestor entități cat și pentru alte forme de proprietate] Translation: The associative forms do not have specific legislation, they are not legally framed correctly and are a source of litigation both for those inside these entities and for other forms of property.	Doru Marinescu	1
Compared to 2017 CNRA, the 2024 assessment seems to consider completed the restitution process. Yet, in 2023 the Forest Code was changed and was included a new forest property type: "forest fund owned by the state, which passed, under the law, from the state's public property to its own property, in order to reconstitute the property right" - which leaves plenty of room to the restitution process continuation. In order to have a minim evidence of the land under the provision from 2023, the NFA Romsilva was supposed to came with the state owned property before 1945, yet these data were not made available so far. Beside this, the forestry cadaster is still missing (while the authorized forest district with territorial competency property chart does not have any legal power). As there is no public evidence of the requested back land which is subject to the 2023 prevision, there is a high risk that the state property is violated. Non-negligible risk should be designated (keeping the Specified risk from 2017 NRA).	Antonela Costea	1
No inputs		41
<b>Total</b>		<b>43</b>

Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?	#
N/A	6
No	4
Yes	33
<b>Total</b>	<b>43</b>



What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondent	#
Membrii formelor asociative cat și alte categorii de proprietari. Translation: Members of associative forms as well as other categories of owners.	Doru Marinescu	1
Forest Code change in 2023 on state owned property.	Antonela Costea	1
I think there is a difference between private forest, especially small ownership, and large ownership or public forest. Small private forest owners have got much less knowledge about the forest and environmental legislation.	Organization/confidential	1
No input		40
<b>Total</b>		<b>43</b>

For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	15
No, mitigation measures for non-negligible indicators are not adequate	3
Yes, mitigation measures for non-negligible indicators are adequate	13
No input	12
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
[Consultări cu factorii politici cat și cu reprezentanții proprietarilor] Consultations with political factors as well as with representatives of the owners	Doru Marinescu	1
No input		42
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Introducerea în legislație a obligativității realizării cadastrului forestier. Translation: The introduction into legislation of the obligation to carry out the forest cadastre.	Asociația ALIANȚĂ PENTRU PĂDURE	1
Legislația nu este completă în momentul de față este în marea majoritate construită pe constrângeri și nu pe a reglementa și a simplifica procesele din silvicultură. Translation: The legislation is not complete at the moment, it is mostly built on constraints and not on regulating and simplifying forestry processes.	Doru Marinescu	1
NU AM COMENTARII Translation: No comments	Expert/confidential	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Translation: The sources of this risk assessment have been identified accordingly.	Expert/confidential	1
No input		39
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for indicator 1.
- ☐ There is one distinct opinion claiming that there is no specific legislation for community forests. Nevertheless, community forests are addressed as a specific form of ownership in the Forest Code and subsequent legislation. The comments will be integrated in the revised CNRA version



<b>Risk indicator</b>	<b>02. Land management rights are in place and registered according to legal requirements.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	The authorisation and activity of Forest districts, which are the entities responsible for forest management in detail, is closely monitored by the national authority (Ministry of Environment, Water and Forests) through its territorial representatives. Any forest harvesting needs to be recorded in SUMAL 2.0, for the wood to have legal registration.

## Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	10
No	3
Yes	30
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
Dreptul de administrare nu este complet. Proprietarul are Obligatii conform CS. dar nu are nici o responsabilizare a acestora. Un proprietar responsabilizat utilizeaza administratori/prestatori de calitate.	Valentin Popa	
Translation: The administration right is not complete. The owner has Obligations according to the CS. but has no responsibility for them. A responsible owner uses quality administrators/providers.		1
La nivel de proprietate nu există succesiuni și nici granituri.Totul trebuie să plece de la proprietatea ca și drept și localizare.Toate interpretările legislative sunt făcute în așa fel încât să se evite blocajele cauzate de o lipsă cronică de evidente clare a proprietăți adică carte funciară și granituri clare în teren.	Doru Marinescu	
Translation: At the property level, there are no successions or demarcations. Everything must start from the property as right and location. All legislative interpretations are made in such a way as to avoid the blockages caused by a chronic lack of clear records of properties, i.e. land register and clear granites in the terrain.		1
No inputs		41
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	11
No	2
Yes	30
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
Totul pornește de la interpretarea statusului de proprietar și raportarea legislativului la acest status. Proprietarii au fost înlocuiți în decizii de cei care fac servicii silvice sau de către administratorii de fond forestier.O mare eroare.	Doru Marinescu	
Translation: Everything starts from the interpretation of the status of the owner and the reporting of the legislature to this status. The owners were replaced in decisions by those who provide forestry services or by the administrators of the forest fund. A big mistake.		1
No input		42
<b>Total</b>		<b>43</b>



For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	15
No, mitigation measures for non-negligible indicators are not adequate	3
Yes, mitigation measures for non-negligible indicators are adequate	9
No input	16
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondents	#
Gradul de participare a proprietarului in procesul de gestionare a padurii. Modul de responsabilizare a acestora.	Valentin Popa	
Translation: The degree of participation of the owner in the forest management process. The way of holding them accountable.		1
Politici forestiere care să aibă la bază funcțiile pădurii în raport cu cerințele unui proprietar indubitabil și evidențiat corect în evidentele funciare .	Doru Marinescu	
Translation: Forestry policies that are based on the functions of the forest in relation to the requirements of an undoubted owner and correctly highlighted in the land records.		1
No input		41
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondents	#
Nu am comentarii relevante, decât faptul că este indicat a se încerca evitarea limbajului de lemn, de pildă „este monitorizată îndeaproape de către autoritatea națională (Ministerul Mediului, Apelor și Pădurilor) prin reprezentanții săi teritoriali”.	Expert/ confidential	
Translation: I have no relevant comments, except that it is advisable to try to avoid wooden language, for example, "it is closely monitored by the national authority (Ministry of Environment, Water and Forests) through its territorial representatives".		1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă.	Expert/ confidential	
Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct		1
No input		41
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ We will further analyze the opinions and arguments related to the scope of this assessment, not related to changes in legislation or forest policies.

<b>Risk indicator</b>	<b>03. Forest concession licenses are in place and are issued and registered according to legal requirements.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	The risk is assessed as negligible, given the very few cases applicable and low probability of tree harvests from areas under concession



## Feedback from public consultation

Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized	#
N/A	10
No	2
Yes	31
<b>Total</b>	<b>43</b>

What arguments / references / evidences can you provide for changing the risk conclusion?	Respondents	#
Evidentele în cazul migrării proprietarilor la diferite structuri silvice care pot să nu fie transmise mai departe sau pot să fie omise cu rea credință.	Doru Marinescu	
Translation: Evidence in case of migration of owners to different forest structures that may not be passed on or may be omitted in bad faith.		1
No input		42
<b>Total</b>		<b>43</b>

Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?	#
N/A	11
No	1
Yes	31
<b>Total</b>	<b>43</b>

What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondents	#
No input		43
<b>Total</b>		<b>43</b>

For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	14
No, mitigation measures for non-negligible indicators are not adequate	2
Yes, mitigation measures for non-negligible indicators are adequate	10
No input	17
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
Proceduri clare la transferul suprafețelor de la o structură silvică la alta.	Doru Marinescu	
Translation: Clear procedures for the transfer of surfaces from one forest structure to another.		1
No input		
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Nu am comentarii.	Expert/ confidential	1
Translation: I have no comments.		
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă.	Expert/ confidential	1



Translation: The sources of this risk assessment have been identified accordingly.  
The description of the risk corresponds to the current situation at the national level.  
The framing is correct.

No input	41
<b>Total general</b>	<b>43</b>

General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ There are some comments that are not in the scope of the indicator, discussing general administration issues and not concession licenses

<b>Risk indicator</b>	<b>04. Harvesting permits are in place and are issued and registered according to legal requirements.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	The issuing and recording of harvesting permits is done within an integrated wood tracking platform (SUMAL), which ensures an efficient control. The risk is considered negligible.

### Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	9
No	3
Yes	31
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
Risc major. Autorizatiile trebuie emise de autoritate. Verificari statistice pe baza de risc. Translation: Major risk. Authorizations must be issued by the authority. Statistical checks based on risk.	Valentin Popa	1
No inputs		42
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	10
No	2
Yes	31
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	14
No, mitigation measures for non-negligible indicators are not adequate	2
Yes, mitigation measures for non-negligible indicators are adequate	8
No input	19
<b>Total</b>	<b>43</b>



What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
transferul autorizării la autoritate. Translation: transfer of the authorization to the authority.	Valentin Popa	1
No input		42
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Nu am comentarii. I have no comments.	Expert/ confidential	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă.  Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ confidential	1
No input		42
<b>Total general</b>		<b>43</b>

Comments received by emails:	Respondent	#
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WWF Romania

#### Argumentare / Descrierea riscului:

##### **R1 Inadverdența Volumului brut menționat în autorizația de exploatare.**

Emiterea autorizației de exploatare se face electronic, prin intermediul aplicației SUMAL Ocol, în baza actului de punere în valoare (APV), ce **reprezintă o estimare a volumului masei lemnoase pe picior**, cu o eroare standard doar a modelului dendrometric de peste 12%, la care se adaugă erorile de măsurare. Diferențele pot să depășească 20% în ceea ce privește volumul de masă lemnoasă calculat prin diferitele metode dendrometrice, în funcție de particularitățile APV-urilor.

Translation: R1 Inadvertence of the Gross Volume mentioned in the exploitation authorization. Issuing the exploitation authorization is done electronically, through the SUMAL Ocol application, based on the valuation act (APV), which represents an estimate of the volume of woody mass per foot, with a standard error only of the dendrometric model of over 12%, at to which measurement errors are added. The differences can exceed 20% in terms of the volume of woody mass calculated by the different dendrometric methods, depending on the particularities of the APVs.

**R2 Lemn provenit din tăieri accidentale pentru care nu există o verificare în teren din partea autorităților/ operatorului. Pentru produse accidentale I, încadrate în tipul funcțional TII, pentru care nu s-a efectuat verificare în teren.**

Translation: R2 Wood from accidental fellings for which there is no field verification by the authorities/operator. For accidental products I, classified in functional type TII, for which no field verification has been carried out.

#### **Risk mitigation measures:**

**R1** Singura soluție fezabilă pentru verificarea fraudării cantităților introduse pe piață, pentru încadrarea în volumul APV plătit în avans, este monitorizarea sistematică a transporturilor ce pleacă de la locul de recoltare (adică a avizelor primare).



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În acest sens, se impune ca, înainte de înregistrarea intrărilor, operatorul care recepționează materialele lemnoase transportate să verifice următoarele:

- (i) conformitatea pozelor încărcate în SUMAL,
- (ii) conformitatea cantităților de lemn declarate în avizul de transport;
- (iii) conformitatea kilometrilor parcurși de transportator de la locul de recoltare în funcție de traseul realizat (conform kilometrajului la bord declarant). În cazul în care există neconformități, măsurile suplimentare pentru atenuarea riscurilor pot varia în funcție de gravitatea abaterilor identificate.

Astfel, pot fi luate în considerare realizarea unor instructaje suplimentare privind măsurarea lemnului și/sau procedurile de completare a formularelor de transport respectiv utilizarea corectă a aplicației SUMAL. În cazul în care abaterile privind cantitățile declarate depășesc toleranțele legale, se urmează procedurile legale pentru corectarea neconformităților.

Verificarea PROCESELOR -VERBALE DE INVENTARIERE a volumului de lemn care depășește volumul actului de punere în valoare, conform anexei 4 din Normele aprobate prin HG. nr. 497/2020, dacă există (deasemenea de verificat).

Translation: R1 The only feasible solution to verify the fraud of the quantities introduced on the market, for inclusion in the APV volume paid in advance, is the systematic monitoring of the transports departing from the harvesting site (i.e. of the primary notices).

In this regard, it is required that, before registering the entries, the operator receiving the transported wood materials verify the following:

- (i) the conformity of the photos uploaded to SUMAL,
- (ii) the conformity of the quantities of wood declared in the transport notice;
- (iii) the conformity of the kilometers traveled by the transporter from the harvesting site according to the route taken (according to the mileage on board the declarant). In the event of non-compliance, additional measures to mitigate the risks may vary depending on the severity of the deviations identified.

Thus, additional training on wood measurement and/or procedures for completing transport forms and the correct use of the SUMAL application may be considered. If the deviations regarding the declared quantities exceed the legal tolerances, legal procedures are followed to correct the non-conformities.

Verification of the INVENTORY PROCESSES - MINUTES of the volume of wood that exceeds the volume of the act of valorization, according to Annex 4 of the Norms approved by GD. no. 497/2020, if any (also to be verified).

**R2** Anexare poze din teren relevante la dosarele partizilor rezultate prin punerea în valoare de produse accidentale I, încadrate în tipul funcțional TII, pentru care nu s-a efectuat verificare în teren.

Translation: R2 Attach relevant field photos to the files of the matches resulting from the valorization of accidental products I, classified in the functional type TII, for which no field verification was carried out.

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ The comments that are in the scope of the indicator and thresholds will be further analysed.



<b>Risk indicator</b>	<b>05. Legal requirements for land-use and management planning are complied with.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	The forest management planning system has become more transparent and has taken into account more environmental sustainability issues, which led to a negligible risk conclusion.

Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	10
No	1
Yes	32
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	11
No	1
Yes	31
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	15
No, mitigation measures for non-negligible indicators are not adequate	1
Yes, mitigation measures for non-negligible indicators are adequate	10
No input	17
<b>Total</b>	<b>43</b>

<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent</b>	<b>#</b>
No input		43
<b>Total general</b>		<b>43</b>

<b>Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).</b>	<b>Respondent</b>	<b>#</b>
Nu am comentarii.	Expert/	
Translation: I have no comments.	confidential	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător.	Expert/	
Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă.	confidential	
Translation: The sources of this risk assessment have been identified accordingly.		
The description of the risk corresponds to the current situation at the national level.		
The framing is correct.		1
No input		42
<b>Total general</b>		<b>43</b>



Comments received by emails:	Respondent	#
<b>05. Sunt respectate cerințele legale privind utilizarea terenurilor și planificarea managementului</b>	WWF Romania	
<b>Risc non-neglijabil</b>		
<b>Argumentare / Descrierea riscului: Argumentation / Description of the risk:</b>		
Aplicabilitate diferențiată		
<b>R1</b> Lemn provenit din suprafețele cu amenajamente silvice care se suprapun, parțial sau total, cu arii naturale protejate de interes comunitar, valabile la data intrării în vigoare a Hotărârii nr. 236 / 15 martie 2023, și pentru care nu s-au elaborat <b>studiul de evaluare adecvată și raportul de mediu</b> în cadrul procedurii de evaluare de mediu. Titularii acestor amenajamente silvice au avut obligația de notificare a autorității competente pentru protecția mediului în vederea revizuirii acestora, în termen de 9 luni de la intrarea în vigoare a hotărârii respective.		
Translation: R1 Wood originating from areas with forest management that overlap, partially or totally, with protected natural areas of community interest, valid on the date of entry into force of Decision no. 236 / 15 March 2023, and for which the appropriate assessment study and the environmental report were not prepared within the framework of the environmental assessment procedure. The holders of these forest managements were obliged to notify the competent authority for environmental protection in order to review them, within 9 months from the entry into force of the respective decision.		
<b>R2</b> Lemn provenit din suprafețele cu amenajamente silvice ale unităților de producție/proprietăților ce intră în componența ariilor naturale protejate si care <b>nu au fost revizuite</b> în termen de 12 luni de la <b>aprobarea planului de management</b> al ariei protejate, conform Art 24 din O.U.G. 57 / 2007.		
Translation: R2 Wood originating from the areas with forest management of production units/properties that are part of protected natural areas and that have not been reviewed within 12 months of the approval of the protected area management plan, according to Art. 24 of O.U.G. 57 / 2007.		
<b>Măsuri de atenuare a riscurilor / Risk mitigation measures:</b>		
<b>R1</b> Verificarea transmiterii notificării către autoritatea competentă pentru protecția mediului, de către titularii de amenajamente silvice în implementare la data intrării în vigoare a Hotărârii nr. 236 / 15 martie 2023.		
Translation: R1 Verification of the transmission of the notification to the competent authority for environmental protection, by the holders of forest management plans in implementation on the date of entry into force of Decision no. 236 / March 15, 2023.		
<b>R2</b> Verificarea actualizării / revizuirii amenajamentelor silvice ale unităților de producție / proprietăților ce intră în componența ariilor naturale protejate al căror planuri de management au fost aprobate dupa data intrării în implementare a amenajamentelor respective.		
Translation: R2 Verification of the update/revision of the for forest management plans of the production units/properties that are part of the protected natural areas whose management plans were approved after the date of implementation of the respective FMPs.		
General comments on stakeholders' feedback		
<input type="checkbox"/> The stakeholders' opinion is generally in favor of the analysis for this indicator.		
<input type="checkbox"/> There are specific comments from WWF on current management plans that will be analysed		



Indicator category: Taxes and Fees

<b>Risk indicator</b>	<b>06. Legal requirements for payment of royalties, land/area taxes and fees are complied with.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	Payments for royalties, land/area taxes and fees benefits from a sound and transparent legislation, as well as enough tools for regulations implementation monitoring.

Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	13
No	2
Yes	28
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
Discrepanța între taxele platite de privat și cele de Public. Translation: The discrepancy between the taxes paid by the private and the Public.	Valentin Popa	1
No input		42
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	15
No	1
Yes	27
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	15
No, mitigation measures for non-negligible indicators are not adequate	1
Yes, mitigation measures for non-negligible indicators are adequate	5
No input	22
<b>Total</b>	<b>43</b>

<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent</b>	<b>#</b>
No input		43
<b>Total general</b>		<b>43</b>



Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Sumele acordate să fie actualizate periodic, în acord cu prețurile piețelor interne și internaționale.	Asociația ALIANȚĂ PENTRU PĂDURE	
Translation: The amounts granted should be updated periodically, in accordance with the prices of the domestic and international markets.		1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă.	Expert/ confidential	
Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.		1
No input		41
<b>Total general</b>		<b>43</b>

Comments received by emails:	Respondent	#
	WWF Romania	

#### **06. Sunt respectate cerințele legale pentru plata redevențelor, impozitelor și taxelor pe teren/suprafață.**

Risc non-neglijabil / non negligible risk

#### **Argumentare / Descrierea riscului /Risk description**

Riscul evitării plății taxei de peaj apare datorită fragmentării administrative și de proprietate a fondului forestier național, respectiv distribuția și forma de administrare a drumurilor forestiere. În multe situații, proprietarul suprafeței de pădure din care se recoltează materialul lemnos și proprietarul drumului utilizat pentru transportul materialului lemnos recoltat nu reprezintă aceeași entitate.

În plus, la nivelul taxelor de drum prevăzute de autoritățile locale pot fi situații discriminatorii în care acestea se aplică în practică doar pentru anumiți operatori. O clarificare legislativă a modului în care aceste taxe locale de drum pot fi impuse este necesară, însă până atunci neplata acestei taxe este o încălcare a legislației aplicabile legată de recoltarea lemnului.

Starea actuală a drumurilor forestiere / lipsa infrastructurii forestiere se datorează inclusiv din cauza evitării plății acestor taxe.

#### **Măsuri de atenuare a riscurilor/ Risk mitigation measures:**

Notificarea proprietarului/administratorului drumului forestier la autorizarea parchetului de exploatare.

Translation:

The risk of avoiding payment of the toll fee arises due to the administrative and ownership fragmentation of the national forest fund, as well as the distribution and management of forest roads. In many cases, the owner of the forest area from which timber is harvested and the owner of the road used for transporting the harvested timber are not the same entity.

Additionally, regarding road fees set by local authorities, there may be discriminatory situations where these fees are applied in practice only to certain operators. A legislative clarification on how these local road fees can be imposed is necessary. However, until such clarification is made, non-payment of this fee constitutes a violation of applicable laws related to timber harvesting.

The current state of forest roads and the lack of forest infrastructure are also partly due to the avoidance of paying these fees.



### Risk mitigation measures:

- Notifying the owner/administrator of the forest road when authorizing the logging site.

### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ There are two comments referring to the monetary level of the road tax - this being not a topic to be assessed for this indicator - and a comment regarding the effect of ownership fragmentation on the tax avoidance occurrence - the presented rationale will be further analysed.

<b>Risk indicator</b>	<b>07. Legal requirements for payment of value-added taxes and/or other sales taxes are complied with.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	The value-added taxes and other sales taxes are regulated by sound legislation, including recently implemented regulations regarding e-Invoice, and the monitoring system is effective.

### Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	13
No	1
Yes	29
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	14
No	2
Yes	27
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
It should be mentioned, in the description of issues/risk section, that there are still missing the explanation of the discrepancies between the national forest inventory and the harvested wood quantities (around 20 mil m3), which drive to the reasonable presumption that there still huge quantities of untaxed wood. However, the risk shall be included under indicator 12. Data and document falsification do not occur.	Antonela Costea	1
No input		42
<b>Total</b>		<b>43</b>



For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	14
No, mitigation measures for non-negligible indicators are not adequate	2
Yes, mitigation measures for non-negligible indicators are adequate	6
No input	21
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
No input		43
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Nu am comentarii.	Expert/ confidential	1
Translation: I have no comments.		
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă.	Expert/ confidential	
Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.		1
No input		42
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ There is a comment referring to the possible untaxed wood but even the stakeholder who made that comment agrees with the fact that the signaled issue should be placed under indicator 12 and not under indicator 7.

<b>Risk indicator</b>	<b>08. Legal requirements for payment of corporate taxes are complied with, including profit taxes.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	The corporate taxes are regulated by sound legislation, including recently implemented regulations regarding e-Invoice, and the monitoring system is effective.

#### Feedback from public consultation

Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized	#
N/A	14
No	2
Yes	27
<b>Total</b>	<b>43</b>



What arguments / references / evidences can you provide for changing the risk conclusion?	Respondents	#
Although there are provisions under the Fiscal Code, since 2020, transposing the Council Directive (EU) 2016/1164 of 12 July 2016 laying down rules against tax avoidance practices that directly affect the functioning of the internal market, the companies may still avoid annual profit tax as the fiscal procedures of the National Agency for Fiscal Administration requires checks only if 5 consequent years there is no profit declared by the company.	Antonela Costea	1
No inputs		42
<b>Total</b>		<b>43</b>

Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?	#
N/A	15
No	2
Yes	26
<b>Total</b>	<b>43</b>

What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondents	#
No input		43
<b>Total</b>		<b>43</b>

For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	12
No, mitigation measures for non-negligible indicators are not adequate	3
Yes, mitigation measures for non-negligible indicators are adequate	7
No input	21
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
Non-negligible risk should be designated and should be verified the financial documents over the profit declared annually and questioned if non.	Antonela Costea	1
No input		42
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Nu am comentarii. Translation: I have no comments.	Expert/ confidential	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ confidential	1
No input		41
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ There is one comment on the fact that companies may be able to avoid profit tax payment due to the fiscal authorities controlling schedule - the risk mentioned in this comment is cross-sectoral - thus not specific to the forest sector. The comment doesn't mention information sources for the signaled situation. It will be further analysed.



<b>Risk indicator</b>	<b>09. Legal requirements for payment of trade and/or export taxes and fees are complied with.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	The trade/export taxes are regulated by sound legislation (including EU level regulations) and all evidence indicate a proper implementation.

### Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	17
No	0
Yes	26
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents #</b>
No inputs	43
<b>Total</b>	<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	17
No	0
Yes	26
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents #</b>
No input	43
<b>Total</b>	<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	14
No, mitigation measures for non-negligible indicators are not adequate	0
Yes, mitigation measures for non-negligible indicators are adequate	7
No input	22
<b>Total</b>	<b>43</b>

<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent #</b>
No input	43
<b>Total general</b>	<b>43</b>

<b>Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).</b>	<b>Respondent #</b>
De remarcat este faptul că toate regulile "jocului" fiscal sunt respectate de companiile care sunt înregistrate în mod corect. Ideea este că sunt mulți agenți economici din domeniu care încă sunt la nivelul economiei gri. Acolo trebuie	Asociația ALIANȚĂ PENTRU PĂDURE 1



făcute analize și cercetări. Inclusiv de către organele de control fiscal ale administrației centrale.

Translation: It should be noted that all the rules of the fiscal "game" are respected by companies that are registered correctly. The point is that there are many economic agents in the field who are still at the level of the gray economy. Analysis and research must be done there. Including by the fiscal control bodies of the central administration.

Nu am comentarii. Translation: I have no comments.	Expert/ confidential	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ confidential	1
No input		40
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ There is one comment mentioning, as an exception, the grey fiscal activity of some companies but the comment is rather general referring to all fiscal activity rather than the object of this indicator - the trade and/or export taxes. However, even the stakeholder who made this comment agrees with the fact that the risk was assessed as negligible.



Indicator category: Corruption and document or data falsification

<b>Risk indicator</b>	<b>10. Legal requirements related to corruption, including bribery, fraud and conflict of interest, are complied with.</b>
<b>Risk conclusion</b>	<b>Non-negligible risk</b>
<b>Source types</b>	all sources types
<b>Risk threshold</b>	10. 2. Violations of identified laws are not efficiently followed up on by the relevant entities;
<b>Short description of risks</b>	Even though there are laws and control procedures in place for reducing corruption, there are still significant cases of such activities in the forest sector, as perceived also by the international organisations.
<b>Risk mitigation</b>	1. Audit of suppliers - interviews with the staff of the supplier, to identify relevant cases of corruption 2. Database verification - reports of controls done by Forest Guard and Police inspectorate - risk areas designation by Forest Guard National and Territorial Offices, using available data from the Forest Guard reports on the controls done in the area, using risk areas designation where available. 3. Training and raising awareness of the suppliers - forest administration and harvesting companies should be trained in identifying and reporting cases of corruption, as part of the anticorruption policies

**Feedback from public consultation**

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	16
No	1
Yes	26
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
Numirea in functii de conducere a unor persoane fara concurs. Translation: Appointing people to management positions without competition.	Valentin Popa	1
No inputs		42
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	18
No	1
Yes	24
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	1
No, mitigation measures for non-negligible indicators are not adequate	9
Yes, mitigation measures for non-negligible indicators are adequate	14



No input	19
<b>Total</b>	<b>43</b>

<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent</b>	<b>#</b>
Educatia si formarea constiientei forestiere a silvicultorilor si a celor care activeaza in domeniu. Translation: Education and formation of forestry awareness of foresters and those active in the field.	Expert/ confidential	1
Este elaborata si adaptata pentru specificul activitatilor silvice (pe intelesul personalului silvic si al publicului larg) - o politica anticoruptie asumata de conducere, cunoscuta de toti angajatii, disponibila public si in mod gratuit (website, avizier, cunoscuta de angajati - verificare prin interviuri) Translation: It is developed and adapted for the specifics of forestry activities (on the understanding of forestry staff and the general public) - an anti-corruption policy assumed by management, known to all employees, publicly available and free of charge (website, notice board, known to employees - verification through interviews)	FSC Romania	1
Numirea de specialisti pe baza de concurs. Plus dupa o practica in teren adecvata. Translation: Appointment of specialists based on competition. Plus after an adequate practice in the field.	Valentin Popa	1
O prima observatie, care este valabila pentru toate pragurile de risc (la toti indicatorii anteriori): la pragul de risc 3-Încălcările legilor identificate nu sunt urmate de acțiuni preventive întreprinse de entitățile relevante. Masurile preventive nu sunt succesive incalcarii dispozitiilor legii!!! HG 599/2018 nu este specifica sectorului! Ca masuri-realitatea arata ca nivelul fraudei in cadrul personalului silvic este mare. Nu este o masura avand aceasta categorie de subiecti! Translation: A first observation, which is valid for all risk thresholds (for all previous indicators): at risk threshold 3-Violations of the laws identified are not followed by preventive actions taken by the relevant entities. The preventive measures are not successive to the violation of the provisions of the law!!! HG 599/2018 is not specific to the sector! As measures, the reality shows that the level of fraud among forestry personnel is high. It is not a measure having this category of subjects!	Viorel Marinescu	1
Poate fi inclusă ca măsură de atenuare a riscului: evaluarea activității gărzilor forestiere de către un organism independent. Translation: It can be included as a risk mitigation measure: assessment of the activity of forest guards by an independent body.	Expert/ confidential	1
No input		38
<b>Total general</b>		<b>43</b>

<b>Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).</b>	<b>Respondent</b>	<b>#</b>
Comentariile sunt de prisos... Translation: Comments are redundant...	Expert/ confidential	1
Mai multă atenție și determinare din partea autorităților competente. Translation: More attention and determination from the competent authorities.	Asociația ALIANȚĂ PENTRU PĂDURE	1
Realizarea si monitorizarea respectarii politicilor de aticoruptie si a codurilor de conduita la nivel de entitate sa nu fie numai o pura formalitate. Translation: The realization and monitoring of compliance with anti-corruption policies and codes of conduct at the entity level should not be just a mere formality.	Expert/ confidential	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ confidential	1
No input		39
<b>Total general</b>		<b>43</b>



Comments received by emails:	Respondent	#
<p><b>10. Sunt respectate cerințele legale referitoare la corupție, inclusiv mita, fraudă și conflictul de interese.</b></p> <p><b>Risc non-neglijabil</b></p> <p><b>Argumentare / Descrierea riscului: Argumentation / Description of the risk:</b></p> <p>Riscul apare atunci când există diferențe între volumul estimat pe picior (APV) și volumul rezultat în urma exploatării <b>ceea ce încurajează practic defprofesionalizarea și conflictul de interese.</b></p> <p>De multe ori, surplusul de volum rezultat în urma exploatării nu este inventariat și adăugat la volumul APV, conform cerințelor legale, fiind introdus pe piață prin fraudarea declarației cu privire la cantitatea, specia și sortimentul (i.e. avizul de însoțire pentru materiale lemnoase /codul unic SUMAL). Doar 0,12 % din totalul formularelor de reprimire a parchetelor de exploatare din anul 2022 s-au constituit în procese verbale de inventariere a volumului de lemn care a depășit volumul actului de punere în valoare.</p> <p>Translation: The risk arises when there are differences between the estimated volume per tree (APV) and the volume resulting from harvesting, which practically encourages deprofessionalization and conflict of interest.</p> <p>Often, the surplus volume resulting from exploitation is not inventoried and added to the APV volume, according to legal requirements, being introduced on the market by falsifying the declaration regarding the quantity, species and assortment (i.e. the accompanying notice for wood materials / unique code SUMAL). Only 0.12% of the total take-back forms of exploitation parks in 2022 were constituted in minutes of inventory of the volume of wood that exceeded the volume of the act of valorization.</p> <p><b>Risk mitigation measures:</b></p> <p>Verificarea PROCESELOR -VERBALE DE INVENTARIERE a volumului de lemn care depășește volumul actului de punere în valoare, conform anexei 4 din Normele aprobate prin HG. nr. 497/2020, dacă există ( deasemenea de verificat).</p> <p>Translation: Verification of the INVENTORY RECORDS of the volume of wood that exceeds the volume of the valuation act, according to Annex 4 of the Norms approved by GD. no. 497/2020, if any (also to be verified).</p>	WWF Romania	

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is in favor of the analysis for this indicator.
- ☐ There are different sources of information and arguments in favor of the same risk conclusion. The opportunity to include the suggested mitigation measures will be analysed.

<b>Risk indicator</b>	<b>11. All forms of bribery and corruption are avoided.</b>
<b>Risk conclusion</b>	<b>Non-negligible risk</b>
<b>Source types</b>	all sources types
<b>Risk threshold</b>	11. 1. Applicable legislation for the area under assessment covers the requirements under this indicator, but the risk assessment for indicator 10 confirms a designation of 'non-negligible risk';



<b>Short description of risks</b>	As indicator 10 was identified with non-negligible risk, this indicator follows the same designation, confirmed by the experts consulted.
<b>Risk mitigation</b>	1. Audit of suppliers - interviews with the staff of the supplier, to identify relevant cases of corruption 2. Database verification - reports of controls done by Forest Guard and Police inspectorate - risk areas designation by Forest Guard National and Territorial Offices, using available data from the Forest Guard reports on the controls done in the area, using risk areas designation where available. 3. Training and raising awareness of the suppliers - forest administration and harvesting companies should be trained in identifying and reporting cases of corruption, as part of the anticorruption policies

## Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	17
No	1
Yes	25
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	17
No	2
Yes	24
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	7
No, mitigation measures for non-negligible indicators are not adequate	0
Yes, mitigation measures for non-negligible indicators are adequate	16
No input	20
<b>Total</b>	<b>43</b>

<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent</b>	<b>#</b>
Accelerarea procedurilor de solutionare a dosarelor de prejudicii etc. Translation: Accelerating the procedures for resolving cases, etc.	Expert/ confidential	1
Controale regulate, amănunțite. Folosirea sistemelor tehnice adecvate. Translation: Regular, thorough checks. Use of appropriate technical systems.	Asociația ALIANȚĂ PENTRU PĂDURE	1



Masurile nu se refera, explicit, si la personalul silvic. Coruptia exista in sistem! Translation: The measures do not explicitly refer to forestry personnel. Corruption exists in the system!	Viorel Marinescu	1
No input		40
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Comentariile sunt de prisos... Translation: Comments are redundant...	Expert/ confidential	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ confidential	1
No input		41
<b>Total general</b>		<b>43</b>

Comments received by emails:	Respondent	#
<b>11. Toate formele de mită și corupție sunt evitate</b> <b>Risc non-neglijabil</b> <b>Măsuri de atenuare a riscurilor / Risk mitigation measures:</b> Verificarea / actualizarea politicilor anticorupție la nivelul organizației. Verifying/updating anti-corruption policies at the organization level.	WWF Romania	

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is in favor of the analysis for this indicator.
- ☐ There are different sources of information and arguments in favor of the same risk conclusion. The opportunity to include the suggested mitigation measures will be analysed.

Risk indicator	12. Data and document falsification do not occur.
Risk conclusion	Non-negligible risk
Source types	all sources types
Risk threshold	12. 1. Applicable legislation for the area under assessment covers the requirements under this indicator, but the risk assessment for indicator 10 confirms a designation of 'non-negligible risk';
Short description of risks	Even though these steps were taken and the situation improved, there are still cases of fraud that lead to a designation of non-negligible risk.
Risk mitigation	1. Document verification - request a history of SUMAL use, including delivery notes, cross checked with the capacity of the track, photos from SUMAL etc - forest guard reports for the areas, from territorial offices - harvesting result check-up 2. Audit of suppliers –



	- field verifications for the correctitude of tree inventories 3. Scientific testing - a system for verification of transports at the gate of log yard/processing company in place
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## Feedback from public consultation

Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized	#
N/A	16
No	
Yes	27
<b>Total</b>	<b>43</b>

What arguments / references / evidences can you provide for changing the risk conclusion?	Respondents	#
No inputs		43
<b>Total</b>		<b>43</b>

Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?	#
N/A	17
No	2
Yes	24
<b>Total</b>	<b>43</b>

What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondents	#
In support to the non-negligible risk designation, it should be mentioned also the fact that the timber evolution which is included into the Volume Estimation Document - APV (the M.O. no. 1323/2015 on approval of dendrometric methods for evaluating the volume of wood intended for recovery and the values necessary for calculating the volume of wood intended for recovery, recording 11 estimation methods), although is an estimation, it overlaps the harvesting quantities in most of the cases (considering that in SUMAL the data accuracy is of 6 decimals).	Antonela Costea	1
No input		1
<b>Total</b>		<b>43</b>

For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	0
No, mitigation measures for non-negligible indicators are not adequate	7
Yes, mitigation measures for non-negligible indicators are adequate	19
No input	17
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
As risk mitigation, there should be checked also the INVENTORY REPORT of the volume of wood exceeding the volume of APV, under annex 4 from the Norms approved by the GD. no. 497/2020, if any (which should be also questioned).	Antonela Costea	1
Instituirea unor verificari in teren bazate pe monitorizarea informatiilor publice disponibile in platforma Inspectorul Padurii - solicitare informatii suplimentare firmelor care introduc date neconforme (fie ele fotografii sau volume care nu bat cu realitatea). Translation: The establishment of field checks based on the monitoring of public information available in the Forest Inspector platform - request for additional information from companies that introduce non-compliant data (either photos or volumes that do not match reality).	FSC Romania	1



Verificare incadrării în toleranțele maxime admise pentru cantitățile din AVIZ. Depozitarea separată și raportarea către autoritate a depășirilor de toleranțe. Translation: Verification of compliance with the maximum tolerances allowed for the quantities in the AVIZ. Separate storage and reporting to the authority of exceeding tolerances.	Organization/ confidential	1
No input		39
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Verificarea corectitudinii întocmirii APV nu poate fi în sarcina unui operator din lanțul de custodie, acesta poate face doar referire la un transport anume care ajunge să fie recepționat la beneficiar. Verificarile referitoare la întocmirea APV se fac de către autoritatea publică competentă prin structurile teritoriale și eventual de către operatorii care achiziționează lemn pe picior. De asemenea rezultatul exploatarei nu are nici un fel de relevanță atât timp cât aplicația SUMAL AVIZE nu permite depășirea volumului înscris în APV. Translation: The verification of the correctness of the preparation of the APV cannot be the responsibility of an operator in the chain of custody, he can only refer to a specific transport that ends up being received by the beneficiary. The checks related to the preparation of the APV are carried out by the competent public authority through the territorial structures and possibly by the operators who purchase wood by the foot. Also, the exploitation result has no relevance as long as the SUMAL AVIZE application does not allow exceeding the volume entered in the APV.	Organization/ Confidential	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descrierea riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ confidential	1
No input		41
<b>Total general</b>		<b>43</b>

Comments received by emails:	Respondent	#
<b>12. Nu au loc falsificarea datelor și a documentelor</b>	WWF Romania	

**Risc non-neglijabil**

#### **Argumentare / Descrierea riscului / Argumentation / Description of the risk:**

Pentru transporturile de lemn care intră în România din spațiul intracomunitar nu se emit avize de însoțire și nu există obligația transmiterii informațiilor standardizate în SUMAL 2.0. Astfel, de la intrarea în țară și până la locul de destinație (punctul de descărcare), transporturile sunt însoțite doar de documentele intracomunitare (factura externă sau scrisoare de trăsură), în format tipărit. Acest lemn este introdus apoi în SUMAL pe baza unei note de intrare-recepție, pe care operatorul o întocmește abia la intrarea în depozit. Astfel, SUMAL 2.0 comportă o breșă prin care se poate „spăla” proveniența pentru lemnul recoltat ilegal. WWF Romania a avertizat asupra riscurilor sistemice încă de la intrarea în vigoare a SUMAL 2.0, iar această breșă a ieșit la iveală abia în iunie 2024, când Garda Forestieră Națională a confiscat 13.500 mc de material lemnos de la un singur operator din județul Suceava (<https://wwf.ro/paduri/o-noua-bresa-in-sumal-2-0/>).

Translation: For timber shipments entering Romania from the intra-Community area, no accompanying notices are issued and there is no obligation to transmit the standardized information in SUMAL 2.0. Thus, from the entry into the country to the place of destination (unloading point), the shipments are accompanied only by intra-Community documents (external invoice or consignment note), in printed format. This timber is then entered into



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SUMAL on the basis of an entry-reception note, which the operator draws up only upon entry into the warehouse. Thus, SUMAL 2.0 contains a loophole through which the provenance of illegally harvested timber can be "laundered". WWF Romania has warned about systemic risks since the entry into force of SUMAL 2.0, and this breach only came to light in June 2024, when the National Forest Guard confiscated 13,500 cubic meters of wood from a single operator in Suceava County (<https://wwf.ro/paduri/o-noua-bresa-in-sumal-2-0/>).

#### **Măsuri de atenuare a riscurilor: Risk mitigation measures:**

##### **Măsuri de atenuare a riscurilor legate de fraudarea provenientei legale**

Pentru prevenirea acestui risc, operatorii care achiziționează lemn din spațiul intracomunitar ar trebui să adopte următoarele măsuri suplimentare (independent de cerințele naționale privind trasabilitatea materialelor lemnoase): (1) operatorii economici - transportatorii profesioniști să aibă obligația înregistrării transporturilor într-o platformă online care permite urmărirea cu obiectivitate a trasabilității cronologice a informațiilor înregistrate (ex. via Gmail); ar trebui raportate astfel, în momentul încărcării, informațiile privind entitățile implicate, datele de identificare a mijlocului de transport și volumul/cantitățile de lemn în baza documentelor intracomunitare, la care să se atașeze poze geolocalizate/fotografii geotagged care să surprindă întreaga încărcătură (lateral stânga-dreapta-spate) și elementele de identificare a transportului (poza față și după caz remorca, respectiv kilometrajul de la bord); (2) la punctul vamal de intrare în țară al materialelor lemnoase provenite din spațiul intracomunitar, să se atașeze în platforma online (ex. Gmail) setul de poze geolocalizate/fotografii geotagged care să permită identificarea locației și a transportului.

Amintim cu aceasta ocazie recomandările WWF pentru îmbunătățirea cadrului legislativ pentru a închide această breșă din cadrul SUMAL:

- Considerarea materialelor lemnoase ca "bunuri cu risc fiscal ridicat pe teritoriul național" (OUG Nr. 41/2022 pentru prevenirea și combaterea comerțului ilicit de bunuri).
- La punctul de intrare în țară al materialelor lemnoase provenite din spațiul intracomunitar, operatorii economici să aibă obligația declarării în [Sistemul RO e-Transport](#) a transportului, în baza documentelor intracomunitare, punând la dispoziția operatorului de transport rutier codul UIT aferent bunurilor transportate.
- Operatorii să aibă obligația înregistrării transporturilor în punctul rutier de trecere a frontierei la intrarea în România, în SUMAL 2.0 Avize, în baza codului unic generat de Sistemul RO e-Transport.

##### **Mitigating measures for the risks related to legal provenance fraud**

Translation: To prevent this risk, operators purchasing wood from the intra-community space should adopt the following additional measures (independently of national requirements regarding the traceability of wood materials): (1) economic operators - professional transporters should be obliged to register transports in an online platform that allows objective tracking of the chronological traceability of the recorded information (e.g. via Gmail); information on the entities involved, the identification data of the means of transport and the volume/quantities of wood based on the intra-community documents should be reported at the time of loading, to which geolocated/geotagged photos should be attached that capture the entire load (lateral left-right-rear) and the elements identifying the transport (front photo and, where applicable, the trailer, respectively the mileage on board); (2) at the customs point of entry into the country of wood materials originating from the intra-community space, the set of geolocated/geotagged photos that allow the identification of the location and the transport should be attached to the online platform (e.g. Gmail).

On this occasion, we recall WWF's recommendations for improving the legislative framework to close this loophole within SUMAL:

- The consideration of wooden materials as "goods with a high fiscal risk on the national territory" (OG No. 41/2022 for the prevention and combating of illicit trade in goods).
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- At the point of entry into the country of wood materials originating from intra-Community space, economic operators must declare the transport in the RO e-Transport System, based on intra-Community documents, making available to the road transport operator the UIT code related to the transported goods.
  - Operators have the obligation to register transports at the road border crossing point upon entering Romania, in SUMAL 2.0 Notices, based on the unique code generated by the RO e-Transport System.

#### **Măsuri de atenuare a riscurilor în legătură cu evaluarea comportamentului operatorilor / transportatorilor profesioniști.**

Deoarece falsificarea datelor introduse în SUMAL este încadrată în categoria riscurilor legate de corupție (indicator 12), este esențial să existe suplimentar și o monitorizare obiectivă, în ceea ce privește comportamentul operatorilor/comercianților. În acest sens, ar fi oportun ca operatorul să mențină o bază de date actualizată cu toate avizele în format electronic (PDF), care să conțină cel puțin informațiile publice disponibile în platforma „Inspectorul Pădurii”, și anume: „informații aviz de transport”, „informații entități implicate”, „volum”, „poze transport”, „vizualizare traseu”.

Astfel, s-ar putea stabili o regulă de eșantionare obiectivă pentru a monitoriza: (1) conformitatea pozelor (adică dacă este cuprinsă în mod sistematic întreaga încărcătură pentru a permite identificarea transportului în funcție de modul de aranjare a încărcăturii); (2) pozele privind kilometrajul indicat la bord înainte deplasării și (3) evaluarea cantităților de lemn declarate (în acest sens se va avea în vedere și evaluarea comparativă (în baza documentației foto) privind istoricul avizelor de transport cu mijloace de transport având aceeași capacitate, respectiv o analiză comparativă a avizelor primare și a celor secundare realizate cu același mijloc de transport).

Pentru evaluarea comportamentului operatorilor, monitorizarile ar trebui să fie sistematice, adică pentru toate transporturile realizate, și nu doar pentru transporturile /parchetele de unde se aprovizionează cu lemn un anumit comerciant (în legătură cu “riscurile de amestec” a materialelor lemnoase). În cazul operatorilor care prezintă abateri repetate sau supraîncărcări flagrante, se poate aplica un program de conformare, care ar trebui să cuprindă un program de instruire a transportatorilor profesioniști, iar în cazuri grave, se poate ajunge până la renunțarea voluntară la serviciile acestor operatori /transportatori profesioniști. În cazul aplicării unui program de conformare, se vor nota toate numerele de înmatriculare auto utilizate pentru realizarea transporturilor de către operator, iar verificările se vor efectua înopinant, posibil online utilizând platforma „Inspectorul Pădurii”.

#### **Translation: Risk mitigation measures in relation to the assessment of the behaviour of professional operators/transporters.**

Since the falsification of data entered in SUMAL is classified as a risk related to corruption (indicator 12), it is essential to additionally have objective monitoring regarding the behaviour of operators/traders. In this regard, it would be appropriate for the operator to maintain an updated database with all notices in electronic format (PDF), containing at least the public information available on the "Forest Inspector" platform, namely: "transport notice information", "entity information involved", "volume", "transport photos", "route visualization".

Thus, an objective sampling rule could be established to monitor: (1) the conformity of the photos (i.e. whether the entire load is systematically included to allow identification of the transport based on the way the load is arranged); (2) photos of the mileage indicated on board before the trip and (3) evaluation of the declared quantities of wood (in this regard, the comparative evaluation (based on photo documentation) of the history of transport permits with means of transport having the same capacity, respectively a comparative analysis of the primary and secondary permits made with the same means of transport will also be taken into account).

To evaluate the behavior of operators, monitoring should be systematic, i.e. for all transports made, and not only for the transports/parks from which a particular trader is

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supplied with wood (in relation to the “risks of mixing” of wood materials). In the case of operators who present repeated deviations or flagrant overloads, a compliance program can be applied, which should include a training program for professional transporters, and in serious cases, it can go as far as voluntarily giving up the services of these operators/professional transporters. In the case of applying a compliance program, all vehicle registration numbers used to carry out transports by the operator will be noted, and checks will be carried out unannounced, possibly online using the "Forest Inspector" platform.

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#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ There are further comments for different risk aspects to be considered, which will be analysed in full.



Indicator category: Management activities and environmental protection

<b>Risk indicator</b>	<b>13. Legal requirements for management activities and related operational requirements are complied with.</b>
<b>Risk conclusion</b>	<b>Non-negligible risk</b>
<b>Source types</b>	all sources types
<b>Risk threshold</b>	13. 2. Violations of identified laws are not efficiently followed up on by the relevant entities;
<b>Short description of risks</b>	Even though the quality of harvesting has increased in the last years, there are still discrepancies between the requirements and the situation in the field, leading to a non-negligible risk conclusion.
<b>Risk mitigation</b>	<ol style="list-style-type: none"> <li>1. Buy certified <ul style="list-style-type: none"> <li>- certification audits have a specific focus on the impact of management activities and operational requirements that stem from the legal provisions, but are not limited to that.</li> </ul> </li> <li>2. Audit of suppliers <ul style="list-style-type: none"> <li>- the focus of the audit would be the harvesting requirements - damages to residual trees and regeneration, compliance with the harvesting technology in the harvesting permit, skidding trail design and use, watercourse crossing, loggyard management.</li> </ul> </li> <li>3. Verification of documents <ul style="list-style-type: none"> <li>- harvesting permits, to verify the harvesting technologies</li> <li>- results of forest harvesting controls done by the forest districts in each harvest site (at least once per month, as required by law), where the non-compliant practices are recorded</li> </ul> </li> <li>4. Training and awareness raising of harvesting companies <ul style="list-style-type: none"> <li>- the companies will be trained on efficient use of harvesting technologies for avoiding damages to residual trees, regeneration and soils. The legal requirements will be presented to raise awareness on their importance.</li> </ul> </li> </ol>

**Feedback from public consultation**

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	16
No	0
Yes	27
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
No inputs		43
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	17
No	1
Yes	25
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
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No need for mitigation measures, as I consider the risk as being negligible	
No, mitigation measures for non-negligible indicators are not adequate	8
Yes, mitigation measures for non-negligible indicators are adequate	18
No input	17
<b>Total</b>	<b>43</b>

<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent</b>	<b>#</b>
Consider ca o masura, care sa aiba o baza in lege, de subventionare a companiilor de exploatare, dupa sistemul "rabla", pentru innoirea utilajelor de exploatare, ar avea urmasi benefice in productivitate, reducerea poluarii, reducerea diverselor daune.  Translation: I believe that a measure, which has a basis in law, of subsidizing mining companies, according to the "rabla" system, for the renewal of mining equipment, would have beneficial consequences in productivity, reducing pollution, reducing various damages.	Viorel Marinescu	1
Este necesara la nivel national de o imbunatatire a nivelului de pregatire a muncitorilor forestieri. Formarea lor este esentiala pentru sector, iar daca nu reusim sa o facem atractiva pentru noile generatii nu o sa mai avem pe cine instrui in cadrul companiilor (punctul 4. la masuri). Translation: It is necessary at the national level to improve the level of training of forestry workers. Their training is essential for the sector, and if we fail to make it attractive for the new generations, we will no longer have anyone to train within the companies. (point 4. on measures)	Expert/ Confidential	1
Limitarea operatiunilor de recoltare in perioadele cu preipitaii abundente Translation: Limiting harvesting operations in periods of heavy rainfall	Expert/ Confidential	1
Managementul forestier este, in mare masura, impus politic si nu este corecta aceasta abordare. Managerii ar trebui numiti prin concurs (cu respectarea deplina a corectitudinii), iar metodele adaptate la noile cerinte economice, sociale si, bineinteles, cu folosirea aplicatiilor si instrumentelor moderne. Translation: Forest management is, to a large extent, politically imposed and this approach is not correct. Managers should be appointed by competition (with full respect for fairness), and methods adapted to the new economic, social requirements and, of course, with the use of modern applications and tools.	Asociatia ALIANȚA PENTRU PĂDURE	1
Se recomanda propunerea mai multor masuri de diminuare implementate de catre administratorul suprafetei de padure - pentru a diminua riscul ca masa lemnoasa neconforma cu acest indicator sa ajunga in piata. Cresterea gradului de constientizare a importantei respectarii acestor cerinte trebuie sa vina din partea ocoalelor silvice si a personalului responsabil. Translation: It is recommended to propose several mitigation measures implemented by the administrator of the forest area - to reduce the risk of wood mass not complying with this indicator reaching the market. Increasing the degree of awareness of the importance of complying with these requirements must come from the forestry department and the responsible personnel.	FSC Romania	1
No input		38
<b>Total general</b>		<b>43</b>

<b>Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).</b>	<b>Respondent</b>	<b>#</b>
Companiile care fac exploatarea forestiera ar trebui sa aiba certificare FSC Translation: Companies that do logging should have FSC certification	RETRO COMPROD SRL	1
Incalcarile regulilor de exploatare sanctionate sunt disponibile in SUMAL SNEICS doar organelor de control. Verificarea respectarii regulilor de exploatare revine emitentului autorizatiei de exploatare si autoritatii publice. Operatorii din lantul de custodie din aval pot doar sa ia la cunostinta despre anumite incalcari declarate pe proprie raspundere de catre furnizori , fara a avea la dispozitie parghii legale. Excluderea unui furnizor din lantul de aprovizionare ar trebui sa fie facuta in baza unor documente verificabile nu pe baza de supozitii.	Organization/ confidential	1



Nerespectarea acestui indicator poate sa apara la fel de bine si in padurile certificate iar verificarea este in sarcina administratiei silvice. Nu trebuie extinsa pe lantul de custodie. Ce se intampla daca o firma de exploatare este sanctionata contravențional? Lemnul recoltat din acel parchet nu se mai poate pune pe piata? Ce masuri de atenuare poate lua un operator din aval.

Translation: Violations of the sanctioned exploitation rules are available in SUMAL SNEICS only to control bodies. The verification of compliance with the exploitation rules is the responsibility of the issuer of the exploitation authorization and the public authority. Operators in the downstream chain of custody can only take notice of certain violations declared on their own responsibility by the suppliers, without having legal levers at their disposal. The exclusion of a supplier from the supply chain should be based on verifiable documents and not based on assumptions. Failure to comply with this indicator can also occur in certified forests and the verification is the responsibility of the forestry administration. It should not be extended on the chain of custody. What happens if an exploitation company is penalized for contravention? The wood harvested from that parquet can no longer be put on the market? What mitigation measures can a downstream operator take.

Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă.	Expert/ Confidential	
Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.		1
No input		40
<b>Total general</b>		<b>43</b>

Comments received by emails:	Respondent	#
<b>13. Sunt respectate cerințele legale pentru activitățile de management și cerințele operaționale aferente</b>	WWF Romania	
<b>Risc non-neglijabil</b>		
<b>Argumentare / Descrierea riscului:</b> Deși legislația obligă autoritățile și administratorii de pădure (i.e. emitenții autorizațiilor de exploatare) să verifice prin sondaj existența dotărilor specifice și a încadrării cu personal de specialitate și să informeze Comisia în cazul neconformităților, această verificare rămâne scriptică, doar asupra documentelor necesare atestării/reatestării. Motivele variază de la lipsa capacității autorităților, lipsa alternativelor în ceea ce privește oferta de prestări servicii, slaba capacitate a firmelor de exploatare, etc.		
<b>Măsuri de atenuare a riscurilor:</b> Monitorizarea / controlul pe teren, a mentinerii condițiilor de atestare și a obligațiilor ce revin operatorilor economici, la predarea parchetului spre exploatare.		
Translation: <b>Rationale / Risk description:</b> Although the legislation obliges forest authorities and administrators (i.e. issuers of exploitation permits) to verify by random sampling the existence of specific facilities and the employment of specialized personnel and to inform the Commission in case of non-compliance, this verification remains scriptural, only on the documents necessary for certification/recertification. The reasons vary from the lack of capacity of the authorities, the lack of alternatives in terms of the offer of services, the weak capacity of the exploitation companies, etc.		
<b>Risk mitigation measures:</b> Monitoring / control on the ground, of maintaining the certification conditions and the obligations of the economic operators, when handing over the forest plot for exploitation.		

General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is in favor of the analysis for this indicator.
- ☐ They have also raised other specific aspects of the risks and suggested further mitigation measures, which will be analysed.



<b>Risk indicator</b>	<b>14. Development and maintenance of infrastructure associated with management activities comply with applicable codes and legal requirements for the protection of environmental values.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	The maintenance of forest infrastructure is regulated to consider the environmental requirements, followed in the field by Environmental protection agencies.

### Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	17
No	3
Yes	23
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
Pe drumurile forestiere circula autotrenuri cu capacitatea mai mare decat cea proiectata Translation: On the forest roads, road auto-trains with a capacity greater than the designed one are running	Expert/ Confidential	1
No inputs		42
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	18
No	2
Yes	23
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	15
No, mitigation measures for non-negligible indicators are not adequate	2
Yes, mitigation measures for non-negligible indicators are adequate	5
No input	21
<b>Total</b>	<b>43</b>

<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent</b>	<b>#</b>
No input		43
<b>Total general</b>		<b>43</b>



Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Legislația în domeniu este supralicitată, avându-se în vedere că densitatea drumurilor forestiere la nivel național stagnează de mult timp în jurul valorii de 6m /ha fond forestier. Translation: Legislation in the field is overbid, considering that the density of forest roads at the national level has been stagnant for some time around the value of 6m/ha of forest floor.	Expert/ Confidential	
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential	
No input		1
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.

Risk indicator	15. Development and maintenance of infrastructure associated with management activities is done in a way that minimises adverse impacts on environmental values.
Risk conclusion	Negligible risk
Source types	all sources types
Risk threshold	
Short description of risks	The maintenance of forest infrastructure is regulated to consider the environmental requirements, followed in the field by Environmental protection agencies.

#### Feedback from public consultation

Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized	#
N/A	17
No	3
Yes	23
<b>Total</b>	<b>43</b>

What arguments / references / evidences can you provide for changing the risk conclusion?	Respondents	#
No inputs		43
<b>Total</b>		<b>43</b>

Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?	#
N/A	17
No	3
Yes	23
<b>Total</b>	<b>43</b>

What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondents	#
No input		43
<b>Total</b>		<b>43</b>



For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	14
No, mitigation measures for non-negligible indicators are not adequate	2
Yes, mitigation measures for non-negligible indicators are adequate	5
No input	22
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
No input		
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Jumătate DA, jumătate NU. Translation: Half YES, half NO.	Asociația ALIANȚĂ PENTRU PĂDURE	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential	1
No input		41
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ There is one different opinion, without arguments

<b>Risk indicator</b>	<b>16. Legal requirements related to biodiversity conservation, protected sites, and the protection of endemic, rare, threatened, or endangered species and their habitats are complied with.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	The system for environmental protection in Romania has become more reliable and transparent in the last years, through specific institutions (ANANP Environmental Protection Agency, Environmental guard).

#### Feedback from public consultation

Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized	#
N/A	17
No	3
Yes	23
<b>Total</b>	<b>43</b>



What arguments / references / evidences can you provide for changing the risk conclusion?	Respondents	#
No inputs		43
<b>Total</b>		<b>43</b>

Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?	#
N/A	17
No	3
Yes	23
<b>Total</b>	<b>43</b>

What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondents	#
No input		43
<b>Total</b>		<b>43</b>

For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	14
No, mitigation measures for non-negligible indicators are not adequate	4
Yes, mitigation measures for non-negligible indicators are adequate	4
No input	21
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
The long term forest planning benefits for biodiversity, may be hindered by new Forest Code provision (if it will be in force as approved by the Senate, 1st Parliament Chamber), as well as the fact that, according to the Ministry Order no. 1134 from May 27, 2024 following the Emergency Government Ordinance no. 109/2011 on corporate governance, the State forest administration is considered a commercial activity and not a public service (meaning that the profit is prevailing, at the expense of the social and environmental aspects) for the NFA Romsilva activity on over 3 million ha of forests.	Antonela Costea	1
No input		42
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
In support to the negligible risk designation, can be considered also the European Commission review from the 2024 Country Report for Romania, released in June 2024, "There is still room for improvement on biodiversity and nature protection and restoration. Romania's forestry system is generally subject to long-term planning to protect biodiversity in a sustainable way. However, illegal logging seems to be a serious issue and may have a significant impact on biodiversity in the affected areas. Romania would therefore benefit from reforming the monitoring, traceability and control of logging activities." (pg. 40) <a href="https://economy-finance.ec.europa.eu/document/download/dcac26a0-120e-4233-88b6-8c7b0d919257_en?filename=SWD_2024_623_1_EN_Romania.pdf">https://economy-finance.ec.europa.eu/document/download/dcac26a0-120e-4233-88b6-8c7b0d919257_en?filename=SWD_2024_623_1_EN_Romania.pdf</a>	Antonela Costea	1
Mă intrigă fraza aceasta din text „Planificarea și implementarea operațiunilor vor fi controlate de Ocolul Silvic”, pentru că în realitate nu se întâmplă nimic, totul este limbaj de lemn. Nu există materie cenușie suficientă și disponibilă pentru așa ceva. Translation: I'm intrigued by this phrase in the text, "The planning and implementation of operations will be controlled by the Forest Circle", because in reality nothing happens, everything is wooden language. There is not enough gray matter available for such a thing.	Expert/ Confidential	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă.	Expert/ Confidential	1



Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.

No input

**Total general**

**43**

**Comments received by emails:**

**Respondent**

**#**

**16. Legal requirements related to biodiversity conservation, protected sites, and the protection of endemic, rare, threatened, or endangered species and their habitats are complied with.**

WWF  
Romania

**Risc non-neglijabil**

**Argumentare / Descrierea riscului:**

Insuficienta integrare a prevederilor planurilor de management ale ariilor protejate în amenajamentele silvice poate conduce la utilizarea unor tehnici de exploatare care pot avea impact negativ asupra biodiversității. Deficiențele de transfer a informațiilor dintre administrația ariilor protejate și administrațiile silvice rezultă în lipsa unor informații concrete privind măsurile necesare a fi aplicate în arii naturale protejate.

Ocoalele silvice solicită administratorilor/custozilor ariilor naturale protejate, cu cel puțin 15 zile înainte de emiterea autorizației de exploatare forestieră, condițiile specifice ce trebuie respectate de către titularii autorizației pentru desfășurarea activității de exploatare forestieră în ariile naturale protejate, fara plan de management, condiții **menționate detaliat în autorizațiile de exploatare**.

De asemenea, nu există un sistem coerent privind monitorizarea respectării acestor condiții de mediu de către Gărzile de Mediu.

**Măsuri de atenuare a riscurilor:**

Verificarea respectarii conditiilor specifice mentionate in autorizatia de exploatare.

**Translation: Rationale / Description of the risk:**

The insufficient integration of the provisions of the management plans of protected areas into the forest management plans may lead to the use of exploitation techniques that may have a negative impact on biodiversity. The deficiencies in the transfer of information between the administration of protected areas and the forestry administrations result in the lack of concrete information on the measures necessary to be applied in protected natural areas.

The forestry districts request the administrators/custodians of protected natural areas, at least 15 days before the issuance of the forestry exploitation authorization, the specific conditions that must be respected by the holders of the authorization for carrying out forestry exploitation activity in protected natural areas, without a management plan, conditions mentioned in detail in the exploitation authorizations.

Also, there is no coherent system for monitoring compliance with these environmental conditions by the Environmental Guards.

**Risk mitigation measures:**

Verification of compliance with the specific conditions mentioned in the harvesting permit.

**General comments on stakeholders' feedback**

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ There are opinions from WWF for changing the risk conclusion, which will be analysed before the final conclusion



<b>Risk indicator</b>	<b>17. Legal requirements relating to the harvesting, collection, and trade of CITES species are complied with.</b>
<b>Risk conclusion</b>	Not applicable
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	There are no species of trees from Romania present on the Appendices of CITES

## Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	20
No	0
Yes	23
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	20
No	
Yes	23
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	12
No, mitigation measures for non-negligible indicators are not adequate	
Yes, mitigation measures for non-negligible indicators are adequate	6
No input	25
<b>Total</b>	<b>43</b>

<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent</b>	<b>#</b>
No input		
<b>Total general</b>		<b>43</b>

<b>Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).</b>	<b>Respondent</b>	<b>#</b>
Neaplicabil	Organization/	
Non-applicable	confidential	1
Nu am comentarii.	Expert/	1



No comments.	Confidential
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential
No input	1
<b>Total general</b>	<b>39</b>
	<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is in favor of the analysis for this indicator.

<b>Risk indicator</b>	<b>18. The volume and impacts of waste from management activities comply with legal requirements, and are managed and minimised.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	The volume of waste in the forest has been significantly reduced during the last years, due to implementation of mandatory waste management systems in every municipality, controls from Environmental and Forest Guard

#### Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	18
No	2
Yes	23
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
No inputs		
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	18
No	2
Yes	23
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	11
No, mitigation measures for non-negligible indicators are not adequate	4



Yes, mitigation measures for non-negligible indicators are adequate	5
No input	23
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
Controalele efectuate de autoritățile relevante NU sunt eficiente, respectiv gama de activități pe care trebuie să le desfășoare aceste autorități este foarte largă, conform ROF-ului, fapt care duce la ineficiență în activitate prin lipsa de perspectivă și prioritizare în abordarea acestora .	Expert/ Confidential	
Translation: The controls carried out by the relevant authorities are NOT effective, i.e. the range of activities that these authorities must carry out is very wide, according to the ROF, which leads to inefficiency in the activity due to the lack of perspective and prioritization in their approach.		
No input		
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Descrierea sumara a riscului nu este corecta (probabil tradusa necorespunzator din engleza)	Mihai Boghean	
Translation: The summary description of the risk is not correct (probably translated incorrectly from English)		1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Deșeurile din pădure (acolo unde apar) se datorează de regulă turismului și localnicilor. Administratorii de păduri fac permanent eforturi pentru colectarea acestora.	Expert/ Confidential	
Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct. Forest litter (where it occurs) is usually due to tourism and local residents. Forest managers are constantly making efforts to collect them.		1
No input		
<b>Total general</b>		<b>43</b>

General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is in favor of the analysis for this indicator.

<b>Risk indicator</b>	<b>19. Pollution resulting from management activities comply with legal requirements, and is controlled and minimised.</b>
<b>Risk conclusion</b>	Non-negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	19. 5. Evidence indicates widespread or systematic violation of requirements covered under this indicator.
<b>Short description of risks</b>	The use of outdated machinery and harvesting practices still maintains a non-negligible risk of oil and fuel spills during forest harvesting.
<b>Risk mitigation</b>	1. Buy certified - certification audits have a specific focus on the impact of management activities and operational requirements that stem from the legal provisions, but are not limited to that. 2. Audit of suppliers



	-the focus of the audit would be the state of machinery in terms of oil and fuel leaks. 3. Verification of documents - harvesting permits, to verify the harvesting technologies - results of Environmental Guard 4. Training and awareness raising of harvesting companies - in relation to the importance of avoiding pollution during the harvesting operations The legal requirements will be presented to raise awareness on their importance.
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## Feedback from public consultation

Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized	#
N/A	18
No	2
Yes	23
<b>Total</b>	<b>43</b>

What arguments / references / evidences can you provide for changing the risk conclusion?	Respondents	#
Amplourea fenomenului și impactul descrise nu sunt la nivelul care să impună un astfel de risc, motiv pentru care consider ca riscul este neglijabil. Translation: The scale of the phenomenon and the impact described are not at the level that imposes such a risk, which is why I consider the risk to be negligible.	Organization/ confidential	
<b>Total</b>		<b>43</b>

Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?	#
N/A	19
No	2
Yes	22
<b>Total</b>	<b>43</b>

What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondents	#
No input		43
<b>Total</b>		<b>43</b>

For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	3
No, mitigation measures for non-negligible indicators are not adequate	5
Yes, mitigation measures for non-negligible indicators are adequate	14
No input	21
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
Aceeasi ca la indicator 13 Translation: same as indicator 13	Viorel Marinescu	1
No input		
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Completarea legislatiei aferente cu legislatia pe mediu. Translation: Complementing the related legislation with environmental legislation.	Expert/ Confidential	1



Nu am comentarii. Riscul îl consider neglijabil în comparație cu celelalte surse de poluare la nivel național. Translation: I have no comments. I consider the risk to be negligible compared to the other sources of pollution at the national level.	Expert/ Confidential	1
O masura suplimentara de atenuare ar putea fi colectarea informatiilor despre distanta medie de scos-apropiat. Translation: An additional mitigation measure could be the collection of information about the average collection distance.	Mihai Boghean	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential	1
No input		39
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ There is an opinion for changing the risk conclusion, which will be analysed

<b>Risk indicator</b>	<b>20. Water resources are protected and used responsibly in compliance with legal requirements, and with the aim of ensuring long-term viability.</b>
<b>Risk conclusion</b>	<b>Non-negligible risk</b>
<b>Source types</b>	all sources types
<b>Risk threshold</b>	20. 5. Evidence indicates widespread or systematic violation of requirements covered under this indicator.
<b>Short description of risks</b>	While the functional zoning system protects important water resources, the practices implemented in the forest harvesting represent a risk for watercourses that supply small farms or households close to the forest.
<b>Risk mitigation</b>	1. Buy certified - certification audits have a specific focus on the impact of management activities and operational requirements that stem from the legal provisions, but are not limited to that. 2. Audit of suppliers - the focus of the audit would be the use of skidding trails and the overlap with permanent watercourses 3. Verification of documents - harvesting permits, to verify the harvesting technologies and the design of the harvesting process (harvest site map) - results of Environmental Guard 4. Training and awareness raising of harvesting companies - in relation to the importance of avoiding the overlap between skidding trails and watercourses.

#### Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	18
No	2
Yes	23
<b>Total</b>	<b>43</b>



What arguments / references / evidences can you provide for changing the risk conclusion?	Respondents	#
Consider ca este un risc neglijabil. Sunt cazuri izolate. Personalul silvic al ocolului care a eliberat autorizatia de exploatare trebuie sa-si faca traba si sa face controalele in parchetele care sunt in apropierea cursurilor de apa si sa reactioneze imediat ce au constatat neregulii. Nu cred ca e nevoie de altceva. Doar ei sa-si faca treaba.  Translation: I consider it a negligible risk. They are isolated cases. The forestry staff of the forest district that issued the exploitation authorization must do their work and do the checks in the parks that are near the watercourses and react as soon as they notice any irregularities. I don't think anything else is needed. Just let them do their job.	RETRO COMPROD SRL	1
Justificările pentru un risc ne-neglijabil nu conving. În perioadele ploioase, mai ales cu ploi torențiale, chiar dacă nu se exploatează masa lemnoasă, scurgerile de pe versanți care se acumulează în cursurile de apă, au oricum o turbiditate ridicată.  Translation: The justifications for a non-negligible risk are not convincing. In rainy periods, especially with torrential rains, even if the woody mass is not exploited, the runoff from the slopes that accumulates in the water courses, has a high turbidity anyway.	Organization/ confidential	1
No inputs		41
<b>Total</b>		<b>43</b>
Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?		#
N/A		19
No		1
Yes		23
<b>Total</b>		<b>43</b>
What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondents	#
No input		
<b>Total</b>		<b>43</b>
For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?		#
No need for mitigation measures, as I consider the risk as being negligible		2
No, mitigation measures for non-negligible indicators are not adequate		6
Yes, mitigation measures for non-negligible indicators are adequate		15
No input		20
<b>Total</b>		<b>43</b>
What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
Actiuni de monitorizarea calitatii apei in bazinele cu lucrari de exploatare a lemnului Translation: Water quality monitoring actions in basins with wood exploitation works	Expert/ Confidential	1
Crearea unei conditionari, prin act normativ, pentru folosirea de tehnologii de exploatare " prietenoase", care sa protejeze resursele de apa Translation: Creation of a condition, by normative act, for the use of "friendly" exploitation technologies, which will protect water resources	Viorel Marinescu	1
Stimularea prin programe a dezvoltarii infrastructurii forestiere si adoptarea de noi solutii in vederea protejarii cursurilor de apa. Translation: Stimulating through programs the development of forestry infrastructure and the adoption of new solutions in order to protect watercourses.	Expert/ Confidential	1
No input		40
<b>Total general</b>		<b>43</b>



Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
O masura suplimentara de atenuare ar putea fi colectarea informatiilor despre distanta medie de scos-apropiat. Translation: An additional mitigation measure could be the collection of information about the average take-out-approach distance.	Mihai Boghean	1
Schita parchetului - pentru identificarea cursurilor de apa permanente si dovezi ca s-au cautat si aplicat solutii alternative tehnice viabile (precum colectarea lemnului in perioada de iarna - poduri de gheata). Se recomanda diminuarea acestui risc de la nivelul originii masei lemnoase, acolo unde poate avea rezultate imediate. Translation: Sketch of the harvesting plot - for the identification of permanent water courses and evidence that viable alternative technical solutions were sought and applied (such as wood collection during the winter - ice bridges). It is recommended to reduce this risk from the level of origin of the wood mass, where it can have immediate results.	FSC Romania	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.		
No input		
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ There are arguments also for changing the risk conclusion and adding supplementary risk mitigation measures

<b>Risk indicator</b>	<b>21. Negative impacts on soils from management activities are minimised, and comply with legal requirements.</b>
<b>Risk conclusion</b>	Non-negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	21. 5. Evidence indicates widespread or systematic violation of requirements covered under this indicator.
<b>Short description of risks</b>	There is a non-negligible risk of soil erosion, especially on skidding trails developed on slopes.
<b>Risk mitigation</b>	1. Buy certified - certification audits have a specific focus on the impact of management activities and operational requirements that stem from the legal provisions, but are not limited to that. 2. Audit of suppliers - the focus of the audit would be the use of skidding trails and the intensity (depth) of soil erosion 3. Verification of documents - harvesting permits, to verify the harvesting technologies and the design of the harvesting process (harvest site map) - results of the harvesting site controls done by the Forest District 4. Training and awareness raising of harvesting companies - in relation to the importance of mitigating soil erosion on skidding trails

#### Feedback from public consultation



Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized	#
N/A	18
No	1
Yes	24
<b>Total</b>	<b>43</b>

What arguments / references / evidences can you provide for changing the risk conclusion?	Respondents	#
<p>Indicatorul urmărește minimizarea impactului și nu lipsa acestuia (lucru imposibil de altfel). Tocmai pentru minimizare regulile impun extragerea doar pe rute de extracție prestabilite. Daunele aduse solurilor care se găsesc pe căile de colectare a lemnului, din cauza transportului de lemn și a eroziunii, sunt firești și inevitabile. Faptul că modificările din instrucțiunile de recoltare (2021) permit, în unele condiții (deci nu în orice condiții), extragerea arborilor cu coroane întregi nu aduce automat risc pentru producerea de eroziune (ci doar atunci când sunt aplicate incorect, însă nu am văzut evidente în raport ca s-ar fi întâmplat sau se întâmplă lucrul acesta în mod sistematic). Sursele legate de auditurile de certificare forestieră au arătat că există încă NCR emise pentru eroziunea solului, dar sunt acestea semnificative la nivel național (sau chiar la nivelul suprafețelor certificate)? Se referă aceste fenomene de eroziune la soluri în general (ceea ce cere indicatorul) sau la starea căilor de colectare (probabil cele mai multe se referă la starea căilor în timpul procesului de exploatare)?</p> <p>Translation: The indicator aims to minimize the impact and not its absence (an impossible thing, by the way). Precisely for the sake of minimization, the rules require extraction only on predetermined extraction routes. Damage to the soils found on logging roads due to timber transport and erosion is natural and unavoidable. The fact that the changes in the harvest instructions (2021) allow, under some conditions (so not under all conditions), the extraction of trees with whole crowns does not automatically bring a risk for the production of erosion (but only when they are applied incorrectly, but I have not seen evidence in the report that this has happened or is happening systematically). Sources related to forest certification audits have shown that there are still NCRs issued for soil erosion, but are they significant at the national level (or even at the level of certified areas)? Do these erosion phenomena refer to soils in general (which is what the indicator requires) or to the condition of the collection roads (probably most of them refer to the condition of the roads during the mining process)?</p>	Tudor Stancioiu	1
<b>Total</b>		<b>43</b>

Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?	#
N/A	20
No	1
Yes	22
<b>Total</b>	<b>43</b>

What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondents	#
No input		
<b>Total</b>		<b>43</b>

For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	0
No, mitigation measures for non-negligible indicators are not adequate	6
Yes, mitigation measures for non-negligible indicators are adequate	15
No input	22
<b>Total</b>	<b>43</b>



What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
A se vedea propunerile de la indicatorii 13 si 20 Translation: See the proposals from indicators 13 and 20	Viorel Marinescu	1
Promovarea metodelor de colectare a lemnului cu funiculare Promotion of wood collection methods with funiculars	Expert/ Confidential	1
Stimularea prin programe a noilor tehnologii, utilizarea instalatiilor de transport pe cablu. Translation: Stimulation through programs of new technologies, the use of cable transport facilities.	Expert/ Confidential	1
No input		40
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
O masura suplimentara de atenuare ar putea fi colectarea informatiilor despre distanta medie de scos-apropiat. Translation: An additional mitigation measure could be the collection of information about the average take-out-approach distance.	Mihai Boghean	
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential	
No input		
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ There are arguments also for changing the risk conclusion or adding supplementary risk mitigation measures



Indicator category: Health and safety

<b>Risk indicator</b>	<b>22. Legal requirements related to occupational health and safety are complied with.</b>
<b>Risk conclusion</b>	<b>Non-negligible risk</b>
<b>Source types</b>	all sources types
<b>Risk threshold</b>	22. 2. Violations of identified laws are not efficiently followed up on by the relevant entities;
<b>Short description of risks</b>	Despite the presence of a robust normative framework that should safeguard workers, health and safety requirements in harvesting activities are often not complied with.
<b>Risk mitigation</b>	<ol style="list-style-type: none"> <li>Document verification: Health and safety documents <ul style="list-style-type: none"> <li>Evidence of health and safety equipment's acquisition by harvesting companies in the supply chain are provided to assure that all workers have access to health and safety equipment</li> <li>Participants' signatures confirming completion of health and safety training are recorded in prior to the commencement of any harvest operations. This ensures all workers are trained and certified before engaging in operational activities.</li> </ul> </li> <li>Database verification: Labour inspectorate reports <ul style="list-style-type: none"> <li>Evidence of controls from the Labour Inspectorates pointing to harvesting companies with higher risks of non-compliance with health and safety requirements</li> <li>Occupational accidents are systematically recorded by economic operators in the supply chain. Workers who have been involved in two or more accidents in the previous year will receive an additional safety training session within one month of the second incident to mitigate future risks.</li> </ul> </li> <li>Training and awareness raising of harvesting companies: <ul style="list-style-type: none"> <li>In most of the cases breaking of health and safety regulation in harvesting operations is done consciously by the workers despite the fact that health and safety equipment's are provided by the employer.</li> </ul> </li> </ol>

**Feedback from public consultation**

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	18
No	1
Yes	24
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
No inputs		43
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	19
No	2
Yes	22
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>



<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	2
No, mitigation measures for non-negligible indicators are not adequate	6
Yes, mitigation measures for non-negligible indicators are adequate	14
No input	21
<b>Total</b>	<b>43</b>

<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent</b>	<b>#</b>
Crearea unei obligatii (prin lege), de notificare a Inspectiei Muncii, pentru fiecare parchet autorizat, pe care aceasta sa aiba obligatia sa-l verifice, cf. competentelor sale.	Viorel Marinescu	
Translation: Creation of an obligation (by law) to notify the Labor Inspectorate, for each authorized prosecutor's office, which it has the obligation to verify, cf. his competences.		1
No input		
<b>Total general</b>		<b>43</b>

<b>Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).</b>	<b>Respondent</b>	<b>#</b>
Cantitățile mici de lemne de 5/10 mc nu sunt tăiate de către firme autorizate, sunt implicate persoane fizice angajate de către proprietar nu de către Ocolul silvic. Acesta din urmă ar trebui să asigure atât marcarea cât și tăierea și transportul lemnului, de către firme cu personal instruit.	Expert/ Confidential	
Translation: The small quantities of wood of 5/10 cubic meters are not cut by authorized companies, natural persons employed by the owner are involved, not by the Forestry. The latter should ensure both the marking and the cutting and transport of the wood by the companies with trained staff.		1
Nu am comentarii, autoritățile competente sa-si facă datoria faptic, nu scriptic. Riscul de corupție major.	Expert/ Confidential	
Translation: I have no comments, the competent authorities should do their duty factually, not in writing. Major corruption risk.		1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Din păcate, în prima jumătate a anului 2024, cele mai multe accidente mortale în România s-au înregistrat în sectorul forestier.	Expert/ Confidential	
Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct. Unfortunately, in the first half of 2024, most fatal accidents in Romania occurred in the forestry sector.		1
No input		39
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ The proposed mitigation measures are related to changes in the regulatory frameworks and not to activities that can be implemented in the supply chain.



<b>Risk indicator</b>	<b>23. Facilities and activities are safe and support worker's health, and workers have access to and use appropriate Personal Protective Equipment commensurate with the activities undertaken.</b>
<b>Risk conclusion</b>	<b>Non-negligible risk</b>
<b>Source types</b>	all sources types
<b>Risk threshold</b>	23. 4. The non-fatal occupational injuries in the area under assessment are more than 591.5 per 100'000 workers and occupational fatalities are more than 2.45 per 100'000 workers.
<b>Short description of risks</b>	Despite the presence of a robust normative framework that should safeguard workers, the occupational fatalities in forest harvesting remain high.
<b>Risk mitigation</b>	<ol style="list-style-type: none"> <li>Document verification: Health and safety documents <ul style="list-style-type: none"> <li>Evidence of health and safety equipment's acquisition by harvesting companies in the supply chain are provided to assure that all workers have access to health and safety equipment</li> <li>Participants' signatures confirming completion of health and safety training are recorded in prior to the commencement of any harvest operations. This ensures all workers are trained and certified before engaging in operational activities.</li> </ul> </li> <li>Database verification: Labour inspectorate reports: <ul style="list-style-type: none"> <li>Evidence of controls from the Labour Inspectorates pointing to harvesting companies with higher risks of non-compliance with health and safety requirements.</li> <li>Occupational accidents are systematically recorded by economic operators in the supply chain. Workers who have been involved in two or more accidents in the previous year will receive an additional safety training session within one month of the second incident to mitigate future risks.</li> </ul> </li> <li>Training and awareness raising of harvesting companies: <ul style="list-style-type: none"> <li>In most of the cases breaking of health and safety regulation in harvesting operations is done consciously by the workers despite the fact that health and safety equipment's are provided by the employer.</li> </ul> </li> </ol>

## Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	18
No	1
Yes	24
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
No inputs		
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	19
No	2
Yes	22
<b>Total</b>	<b>43</b>



What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondents
No input	# 43
<b>Total</b>	<b>43</b>

For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	
No, mitigation measures for non-negligible indicators are not adequate	5
Yes, mitigation measures for non-negligible indicators are adequate	17
No input	21
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent
A se vedea comentariul de la indicator 22	Viorel
Translation: See the comment on indicator 22	Marinescu
No input	
<b>Total general</b>	<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent
Diminuarea riscurilor se realizează prin ridicarea nivelului informațional asimilat de către angajații societăților de exploatare forestieră. Deci educație... în familie, instituții de învățământ și la locul de muncă.	Expert/ Confidential
Translation: The reduction of risks is achieved by raising the level of information assimilated by the employees of forestry companies. So education... in the family, educational institutions and the workplace	
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă.	Expert/ Confidential
Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	
No input	1
<b>Total general</b>	<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ The mitigation measures related to education and trainings for workers will be better displayed in the revised version of the CNRA

<b>Risk indicator</b>	<b>24. The use, application, storage, and disposal of chemicals in management activities addresses the protection of the environment and human health and safety and complies with legal requirements.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	The management of chemicals in the forest sector is regulated, and there is no evidence of non-compliance with the existing regulations.



## Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	18
No	2
Yes	23
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
No inputs		43
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	19
No	2
Yes	22
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	14
No, mitigation measures for non-negligible indicators are not adequate	2
Yes, mitigation measures for non-negligible indicators are adequate	5
No input	22
<b>Total</b>	<b>43</b>

<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent</b>	<b>#</b>
No input		43
<b>Total general</b>		<b>43</b>

<b>Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).</b>	<b>Respondent</b>	<b>#</b>
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential	1
No input		42
<b>Total general</b>		<b>43</b>

General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is in agreement with the analysis done for this indicator.



Indicator category: Human and labour rights

<b>Risk indicator</b>	<b>25. Human rights protected under international law, as enshrined in national law, are complied with.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	The human rights are recognised by the legislation and there is no evidence of regulation violations.

**Feedback from public consultation**

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	17
No	1
Yes	25
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
No inputs		43
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	19
No	1
Yes	23
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	15
No, mitigation measures for non-negligible indicators are not adequate	1
Yes, mitigation measures for non-negligible indicators are adequate	5
No input	22
<b>Total</b>	<b>43</b>

<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent</b>	<b>#</b>
No input		43
<b>Total general</b>		<b>43</b>



Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Nu am comentarii. No comments.	Expert/ Confidential	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential	1
No input		
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion in favor of the analysis for this indicator.
- ☐ The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level.

<b>Risk indicator</b>	<b>26. Harvest or trade in products do not contribute to a violation of international human rights or is not associated with armed conflicts.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	According to United Nations, there is no UN Security Council export ban on Romania

#### Feedback from public consultation

Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized	#
N/A	17
No	1
Yes	25
<b>Total</b>	<b>43</b>

What arguments / references / evidences can you provide for changing the risk conclusion?	Respondents	#
No inputs		43
<b>Total</b>		<b>43</b>

Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?	#
N/A	20
No	1
Yes	22
<b>Total</b>	<b>43</b>

What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondents	#
No input		43
<b>Total</b>		<b>43</b>



For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	15
No, mitigation measures for non-negligible indicators are not adequate	1
Yes, mitigation measures for non-negligible indicators are adequate	5
No input	22
<b>Total</b>	<b>43</b>


What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
No input		43
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Nu am comentarii.	Expert/	
No comments.	Confidential	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/	
	Confidential	1
No input		41
<b>Total general</b>		<b>43</b>

General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is in favor of the analysis for this indicator.
- ☐ The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level.

<b>Risk indicator</b>	<b>27. Legal requirements related to child labour and employment of young workers are complied with.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	Legal requirements related to child labour and employment of young workers are complied with. No issues in Romania on these aspects.

 Feedback from public consultation

Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized	#
N/A	17
No	1
Yes	25
<b>Total</b>	<b>43</b>

What arguments / references / evidences can you provide for changing the risk conclusion?	Respondents	#
No inputs		43
<b>Total</b>		<b>43</b>



Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?	#
N/A	19
No	1
Yes	23
<b>Total</b>	<b>43</b>

What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondents	#
No input		
<b>Total</b>		<b>43</b>

For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	13
No, mitigation measures for non-negligible indicators are not adequate	2
Yes, mitigation measures for non-negligible indicators are adequate	6
No input	22
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
No input		43
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Nu am comentarii.	Expert/	
No comments.	Confidential	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă.	Expert/	
Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Confidential	1
No input		41
<b>Total general</b>		<b>43</b>

General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level.

<b>Risk indicator</b>	<b>28. Child labour is not present, and the employment of young workers is responsibly managed, including related rights as specified in the ILO Fundamental Principles and Rights at Work.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	Child labour is not present, and the employment of young workers is responsibly managed, including related rights as specified in the ILO Fundamental Principles and Rights at Work.



## Feedback from public consultation

Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized	#
N/A	17
No	1
Yes	25
<b>Total</b>	<b>43</b>

What arguments / references / evidences can you provide for changing the risk conclusion?	Respondents	#
No inputs		43
<b>Total</b>		<b>43</b>

Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?	#
N/A	19
No	1
Yes	23
<b>Total</b>	<b>43</b>

What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondents	#
No input		43
<b>Total</b>		<b>43</b>

For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	14
No, mitigation measures for non-negligible indicators are not adequate	1
Yes, mitigation measures for non-negligible indicators are adequate	6
No input	22
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
No input		43
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Nu am comentarii.	Expert/	
No comments.	Confidential	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă.	Expert/	
Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Confidential	1
No input		41
<b>Total general</b>		<b>43</b>

## General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level.



<b>Risk indicator</b>	<b>29. Legal requirements related to modern slavery, including forced and compulsory labour, are complied with.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	Legal requirements related to modern slavery, including forced and compulsory labour, are complied with. No cases of forced slavery or slavery in forestry.

## Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	18
No	
Yes	25
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
No inputs		43
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	20
No	
Yes	23
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	15
No, mitigation measures for non-negligible indicators are not adequate	
Yes, mitigation measures for non-negligible indicators are adequate	5
No input	23
<b>Total</b>	<b>43</b>

<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent</b>	<b>#</b>
No input		43
<b>Total general</b>		<b>43</b>

<b>Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).</b>	<b>Respondent</b>	<b>#</b>
Nu am comentarii.	Expert/	
No comments.	Confidential	1



Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential	1
No input		41
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level.

<b>Risk indicator</b>	<b>30. Modern slavery, including forced and compulsory labour are not used, promoted, or supported in any way, including as specified in the ILO Fundamental Principles and Rights at Work.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	Modern slavery, including forced and compulsory labour are not used, promoted, or supported in any way

#### Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	18
No	
Yes	25
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
No inputs		43
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	20
No	
Yes	23
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
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No need for mitigation measures, as I consider the risk as being negligible	15
No, mitigation measures for non-negligible indicators are not adequate	
Yes, mitigation measures for non-negligible indicators are adequate	5
No input	23
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
No input		
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Nu am comentarii relevante în acest domeniu. Translation: I have no relevant comments in this area.	Expert/ Confidential	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential	1
No input		41
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is in favor of the analysis for this indicator.
- ☐ The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level.

Risk indicator	<b>31. Legal requirements related to the Freedom of Association, the Right to Organise and the Right to Collective Bargaining are complied with.</b>
Risk conclusion	Negligible risk
Source types	all sources types
Risk threshold	
Short description of risks	All legal requirements related to the Freedom of Association, the Right to Organise and the Right to Collective Bargaining are complied with.

#### Feedback from public consultation

Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized	#
N/A	17
No	1
Yes	25
<b>Total</b>	<b>43</b>

What arguments / references / evidences can you provide for changing the risk conclusion?	Respondents	#
No inputs		43
<b>Total</b>		<b>43</b>



Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?	#
N/A	19
No	1
Yes	23
<b>Total</b>	<b>43</b>

What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondents	#
No input		43
<b>Total</b>		<b>43</b>

For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	14
No, mitigation measures for non-negligible indicators are not adequate	2
Yes, mitigation measures for non-negligible indicators are adequate	5
No input	22
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
No input		43
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Nu am comentarii relevante în acest domeniu. I have no relevant comments in this area.	Expert/ Confidential	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential	1
No input		41
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level.

<b>Risk indicator</b>	<b>32. Labour rights related to the Freedom of Association, the Right to Organise and the Right to Collective Bargaining are respected, including as specified in the ILO Fundamental Principles and Rights at Work.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	All legal requirements related to the Freedom of Association, the Right to Organise and the Right to Collective Bargaining are complied with.



## Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	17
No	1
Yes	25
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
No inputs		43
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	19
No	1
Yes	23
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	14
No, mitigation measures for non-negligible indicators are not adequate	2
Yes, mitigation measures for non-negligible indicators are adequate	5
No input	22
<b>Total</b>	<b>43</b>

<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent</b>	<b>#</b>
No input		43
<b>Total general</b>		<b>43</b>

<b>Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).</b>	<b>Respondent</b>	<b>#</b>
Nu am comentarii relevante în acest domeniu. Translation: I have no relevant comments in this area.	Expert/ Confidential	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential	1
No input		41
<b>Total general</b>		<b>43</b>

### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level.



<b>Risk indicator</b>	<b>33. Legal requirements related to the recruitment and employment of workers are complied with.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	In Romania the legal requirements related to the recruitment and employment of workers are complied with.

### Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	18
No	1
Yes	24
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
No inputs		43
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	20
No	1
Yes	22
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	14
No, mitigation measures for non-negligible indicators are not adequate	1
Yes, mitigation measures for non-negligible indicators are adequate	6
No input	22
<b>Total</b>	<b>43</b>

<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent</b>	<b>#</b>
No input		43
<b>Total general</b>		<b>43</b>

<b>Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).</b>	<b>Respondent</b>	<b>#</b>
Nu am comentarii relevante în acest domeniu. Translation: I have no relevant comments in this area.	Expert/ Confidential	1



Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential	1
No input		
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level.

<b>Risk indicator</b>	<b>34. Legal requirements related to the contracts and working permits, and requirements for competence certifications and other training requirements are complied with.</b>
<b>Risk conclusion</b>	<b>Non-negligible risk</b>
<b>Source types</b>	all sources types
<b>Risk threshold</b>	34. 3. Violations of identified laws are not followed up by preventive actions taken by the relevant entities.
<b>Short description of risks</b>	The employment of unskilled workers are widespread nationwide.
<b>Risk mitigation</b>	1. Database verification: Verification if workers have job specific qualifications consistent with the legal provisions using REVISAL platform; 2. Document verification: Verifications on workers qualifications documents; Verification of training records for all relevant workers. 3.Stakeholders consultations: Interviews with employees and contractors' staff to check if workers know the specific job tasks. 4. Training and awareness on forest operations: verification if the training plan (topics, responsible persons, deadlines) exists and is implemented; 5. Field verification: Check on the field if workers know the specific job tasks.

#### Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	18
No	1
Yes	24
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondent s</b>	<b>#</b>
Nu avem date, surse care să ne ducă către un risc ne-neglijabil. Munca la negru în sectorul silvic s-a redus considerabil corelat cu controalele efectuate periodic de ITM și riscul crescut de accidente. Translation: We have no data, sources that lead us to a non-negligible risk. Undocumented work in the forestry sector has been considerably reduced in correlation with the periodic checks carried out by the ITM and the increased risk of accidents.	Organization / confidential	1
No input		42
<b>Total</b>		<b>43</b>



Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?	#
N/A	18
No	1
Yes	24
<b>Total</b>	<b>43</b>

What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondents	#
No input		43
<b>Total</b>		<b>43</b>

For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	2
No, mitigation measures for non-negligible indicators are not adequate	4
Yes, mitigation measures for non-negligible indicators are adequate	17
No input	20
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
Achizitionarea de lemn certificat. Translation: Purchase of certified wood.	Mihai Boghean	1
Verificari ITM Translation: ITM (Labour agency) checks	Viorel Marinescu	1
No input		41
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Nu am comentarii relevante în acest domeniu. Translation: I have no relevant comments in this area.	Expert/ Confidential	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential	1
No input		
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ The sources of this risk assessment have been identified accordingly.
- ☐ One comment indicate that the risk can be negligible as no data is available. Undocumented work in the forestry sector has been considerably reduced in correlation with the periodic checks carried out by the Labor Inspection and the increased risk of accidents. For these comments, the response is that we consider the precautionary approach and all experts involved in the developing the RA indicate the risk as non-negligible.
- ☐ Purchasing of certified wood and Labour inspection represent mitigation measures indicate by respondents.



<b>Risk indicator</b>	<b>35. Legal requirements related to workers' wages and other payments, such as social insurance contributions and the payment of social and income taxes withheld by the employer on behalf of the worker, are complied with.</b>
<b>Risk conclusion</b>	<b>Non-negligible risk</b>
<b>Source types</b>	all sources types
<b>Risk threshold</b>	35. 2. Violations of identified laws are not efficiently followed up on by the relevant entities;
<b>Short description of risks</b>	Romania faces some issues in addressing the legal requirements related to workers' wages and other payments, such as social insurance contributions and the payment of social and income taxes withheld by the employer on behalf of the worker.
<b>Risk mitigation</b>	1.Document verification: -Verification of Individual/collective labor contracts to check if workers are legally employed; -Verification of evidences on salaries in order to demonstrate that the salaries are paying at time; - Verification of general register of employees and associated document; - Check the control reports of Labour institution to establish if is any financial issues 2. Database verification: Verification on legality of contracts of workers using REVISAL platform; 3.Stakeholders consultations: Interviews with employees and contractors' staff to check if is any complain regarding the contracts and payments

## Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	19
No	
Yes	24
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	19
No	
Yes	24
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	1
No, mitigation measures for non-negligible indicators are not adequate	3
Yes, mitigation measures for non-negligible indicators are adequate	19
No input	20
<b>Total</b>	<b>43</b>



What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
Achiziționarea de lemn certificat ar putea fi considerată o măsură de diminuare, în timpul auditului făcându-se aceste verificări și interviuri. Verificarea rapoartelor pe management forestier disponibile public și, în caz de neconformitate, solicitarea Translation: The purchase of certified wood could be considered a mitigation measure, during the audit these checks and interviews are carried out. Verification of publicly available forest management reports and, in case of non-compliance, the request	FSC Romania	1
No input		42
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Nu am comentarii relevante în acest domeniu. Translation: I have no relevant comments in this area.	Expert/ Confidential	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential	1
No input		41
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level.
- ☐ Purchasing the certified wood is indicated as a mitigation measure.

<b>Risk indicator</b>	<b>36. Legal requirements related to working hours, overtime, rest time and time off are complied with.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	The requirements on working hours, overtime, rest time and time off are complied with

#### Feedback from public consultation

Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized	#
N/A	17
No	2
Yes	24
<b>Total</b>	<b>43</b>



What arguments / references / evidences can you provide for changing the risk conclusion?	Respondents	#
Without having scientific results some personal experience from visits in Romania did show, that frequently forest workers are having mobile houses located in the forest where they stay during harvesting operations. Such accomodation in frequently very basic and it is likely, that workers will try work more than 8 hours if there is no possibility to go home after work. There is a strong motivation to reduce the lenght of the say in the forest by working longer per day.	Organization / confidential	1
<b>Total</b>		<b>43</b>

Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?	#
N/A	19
No	1
Yes	23
<b>Total</b>	<b>43</b>

What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondents	#
No input		43
<b>Total</b>		<b>43</b>

For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	14
No, mitigation measures for non-negligible indicators are not adequate	1
Yes, mitigation measures for non-negligible indicators are adequate	6
No input	22
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
No input		43
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Nu am comentarii relevante în acest domeniu. Translation: I have no relevant comments in this area.	Expert/ Confidential	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential	1
No input		
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level.
- ☐ One comment indicate that frequently forest workers are having mobile houses located in the forest where they stay during harvesting operations. Such accomodation is frequently very basic and it is likely, that workers will try work more than 8 hours if there is no possibility to go home after work. Regarding this issue, we dont consider as an issue of overtime since all the activities are pay according to contract.



<b>Risk indicator</b>	<b>37. Labour rights related to recruitment and employment, contracts, training, workers' wages and other payments, working hours, overtime, rest time and time off are upheld, including as specified in the ILO Fundamental Principles and Rights at Work are upheld.</b>
<b>Risk conclusion</b>	<b>Non-negligible risk</b>
<b>Source types</b>	all sources types
<b>Risk threshold</b>	37. 1. Applicable legislation for the area under assessment covers all ILO Fundamental Principles and Rights at Work, but the risk assessment for indicators 33, 34, 35, and 36 confirm a designation of 'non-negligible risk';
<b>Short description of risks</b>	The employment of unskilled workers is widespread nationwide; Romania face issues on legal requirements related to workers' wages and other payment. Risk establish base on Indicator 34 and 35 according to the first threshold
<b>Risk mitigation</b>	<p>1. Database verification: Verification if workers have job specific qualifications consistent with the legal provisions using REVISAL platform; Verification on legality of contracts of workers using REVISAL platform;</p> <p>2. Document verification: -Verification of Individual/collective labor contracts to check if workers are legally employed; -Verification of evidences on salaries in order to demonstrate that the salaries are paying at time; Verification of general register of employees and associated documents; Check the control reports of Labour institution to establish if is any financial issues; Verifications on workers qualifications documents; Verification of training records for all relevant workers.</p> <p>3. Stakeholders consultations: Interviews with employees and contractors' staff to check if is any complains regarding the contracts and payments; Interviews with employees and contractors' staff to check if workers know the specific job tasks.</p> <p>4. Training and awareness on forest operations: verification if the training plan (topics, responsible persons, deadlines) exists and is implemented;</p> <p>5. Field verification: Check on the field if workers know the specific job tasks.</p>

## Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	19
No	
Yes	24
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
No inputs		43
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	20
No	1
Yes	22
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>



For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	1
No, mitigation measures for non-negligible indicators are not adequate	2
Yes, mitigation measures for non-negligible indicators are adequate	19
No input	21
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
No input		43
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Nu am comentarii relevante în acest domeniu. Translation: I have no relevant comments in this area.	Expert/ Confidential	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential	1
No input		
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level.

Risk indicator	38. Legal requirements related to discrimination against workers are complied with.
Risk conclusion	Negligible risk
Source types	all sources types
Risk threshold	
Short description of risks	The principle of equal treatment of all employees and employers applies in employment relationships.

#### Feedback from public consultation

Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized	#
N/A	19
No	1
Yes	23
<b>Total</b>	<b>43</b>

What arguments / references / evidences can you provide for changing the risk conclusion?	Respondents	#
No inputs		43
<b>Total</b>		<b>43</b>



Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?	#
N/A	20
No	1
Yes	22
<b>Total</b>	<b>43</b>

What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondents	#
No input		43
<b>Total</b>		<b>43</b>

For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	13
No, mitigation measures for non-negligible indicators are not adequate	1
Yes, mitigation measures for non-negligible indicators are adequate	6
No input	23
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
No input		
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Nu am comentarii relevante în acest domeniu. Translation: I have no relevant comments in this area.	Expert/ Confidential	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential	1
No input		41
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level.

<b>Risk indicator</b>	<b>39. There is no discrimination against workers in processes related to hiring, remuneration and access to training, promotion, termination, or retirement, including related rights as specified in the ILO Fundamental Principles and Rights at Work.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	There is no discrimination against workers in processes related to hiring, remuneration and access to training, promotion, termination, or retirement.



## Feedback from public consultation

Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized	#
N/A	19
No	2
Yes	22
<b>Total</b>	<b>43</b>

What arguments / references / evidences can you provide for changing the risk conclusion?	Respondents	#
În practica FSC verificarea informațiilor se face din trei surse, una dintre ele o constituie interviurile. Afirmatia mea se bazează pe discuțiile avute cu absolvenți foarte buni care au picat la examenul pe post în defavoarea unor absolvenți de calitate îndoielnică. Dacă ne dorim un management forestier de calitate va trebui să promovăm oamenii de calitate. Cred că angajările în administrația silvică națională ar trebui să se realizeze mult mai transparent, tocmai pentru a se evita eventualele situații de discriminare (vedeți exemplul unei metodologii anterioare de angajare de la RNP când discriminarea s-a realizat la nivel instituțional, nu individual). Nu am alte argumente, dar nici nu cred că în lipsa dovezilor documentate în scris ar trebui neglijat un aspect care este arhicunoscut și care, în România, nu se petrece doar în silvicultură. Translation: In FSC practice, the verification of information is done from three sources, one of them is the interviews. My claim is based on discussions with very good graduates who failed the job exam in favor of graduates of questionable quality. If we want quality forest management, we will have to promote quality people. I think that hiring in the national forestry administration should be done much more transparently, precisely to avoid possible situations of discrimination (see the example of an earlier hiring methodology from the RNP when the discrimination was done at the institutional level, not individually). I have no other arguments, but I also don't think that in the absence of evidence documented in writing, an aspect that is well-known and that, in Romania, does not only happen in forestry should be neglected.	Expert/ Confidential	1
No inputs		42
<b>Total</b>		<b>43</b>

Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?	#
N/A	20
No	1
Yes	22
<b>Total</b>	<b>43</b>

What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondents	#
No input		43
<b>Total</b>		<b>43</b>

For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	13
No, mitigation measures for non-negligible indicators are not adequate	2
Yes, mitigation measures for non-negligible indicators are adequate	5
No input	23
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
Asigurarea transparenței și corectitudinii la examenele de angajare în administrația silvică.		1



Translation: Ensuring transparency and fairness in employment examinations in the forestry administration.	
No input	42
<b>Total general</b>	<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Nu am comentarii relevante în acest domeniu. Translation: I have no relevant comments in this area.	Expert/ Confidential	1
No input		42
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level.
- ☐ One comment is related to ensuring transparency and fairness in employment examinations in the forestry administration. Very good graduates who failed the job exam in favor of graduates of questionable quality. Regarding the hiring procedures, the legislation is very clear. We cannot assess the punctual situation and consider as risk at national level. At accreditation of forestry faculties, the reports of hiring of graduates indicate a percent of 65-75% of graduated that work in forestry after they finish the studies.

<b>Risk indicator</b>	<b>40. Legal requirements related to gender equality in the workplace are complied with.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	Legal requirements related to gender equality are complied with.

#### Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	19
No	1
Yes	23
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
No inputs		43
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	20
No	1
Yes	22
<b>Total</b>	<b>43</b>



What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondents
#	
No input	43
<b>Total</b>	<b>43</b>

For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	14
No, mitigation measures for non-negligible indicators are not adequate	1
Yes, mitigation measures for non-negligible indicators are adequate	5
No input	23
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent
#	
No input	43
<b>Total general</b>	<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent
#	
<a href="https://www.jaromania.org/programe-proiecte/orientare-profesionala/fete-in-silvicultura/">https://www.jaromania.org/programe-proiecte/orientare-profesionala/fete-in-silvicultura/</a> - doar ca informare / completare - inca un proiect educatinal care promoveaza identitatea de gen in silvicultura.	Bogdan Banica
	1
Nu am comentarii relevante în acest domeniu. I have no relevant comments in this area.	Expert/ Confidential
	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential
	1
No input	
<b>Total general</b>	<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level.

<b>Risk indicator</b>	<b>41. Gender equality is protected following best practices, including ensuring availability of job opportunities, equal remuneration for work of equal value and sufficient maternity and paternity leave, and other related rights as specified in the ILO Fundamental Principles and Rights at Work.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	Gender equality is protected following best practices.

#### Feedback from public consultation

Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized	#
N/A	19



No	1
Yes	23
<b>Total</b>	<b>43</b>

What arguments / references / evidences can you provide for changing the risk conclusion?	Respondents #
No inputs	43
<b>Total</b>	<b>43</b>

Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?	#
N/A	20
No	1
Yes	22
<b>Total</b>	<b>43</b>

What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondents #
No input	43
<b>Total</b>	<b>43</b>

For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	14
No, mitigation measures for non-negligible indicators are not adequate	1
Yes, mitigation measures for non-negligible indicators are adequate	5
No input	23
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent #
No input	43
<b>Total general</b>	<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent #
Nu am comentarii relevante în acest domeniu. Egalitatea de gen este garantată, dar domeniul silviculturii este tradițional masculin. Translation: I have no relevant comments in this area. Gender equality is guaranteed, but the field of forestry is traditionally male.	Expert/ Confidential
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential
No input	1
<b>Total general</b>	<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level.
- ☐ One comment indicate that the gender equality is guaranteed,even if the field of forestry is traditionally male.



Indicator category: Third parties rights

<b>Risk indicator</b>	<b>42. Legal requirements related to the rights of Indigenous Peoples are complied with.</b>
<b>Risk conclusion</b>	Not applicable
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	There are no recognized indigenous peoples in Romania

Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	19
No	
Yes	24
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
No inputs		43
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	21
No	
Yes	22
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	12
No, mitigation measures for non-negligible indicators are not adequate	
Yes, mitigation measures for non-negligible indicators are adequate	4
No input	27
<b>Total</b>	<b>43</b>

<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent</b>	<b>#</b>
No input		
<b>Total general</b>		<b>43</b>

<b>Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).</b>	<b>Respondent</b>	<b>#</b>
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Neaplicabil Non-applicable	Organization	1
Nu am comentarii relevante în acest domeniu. Având în vedere situația actuală a forței de muncă și a tendinței de migrație a popoarelor asiatice, vom avea și noi populații așa-zise „indiene” nu indigene, menite să înlocuiască forța noastră de muncă pe principiul vaselor comunicante. Translation: I have no relevant comments in this area. Considering the current situation of the labor force and the migration trend of the Asian peoples, we will also have new so-called "Indian" non-indigenous populations, intended to replace our labor force on the principle of communicating vessels.	Expert/ Confidential	1
Nu sunt necesare măsuri de atenuare, deoarece riscul nu este aplicabil Translation: No mitigation measures are required as the risk is not applicable	Tudor Stancioiu	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential	1
No input		39
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.

<b>Risk indicator</b>	<b>43. The rights of Indigenous Peoples, including land tenure and management, are respected and upheld according to the principles of FPIC.</b>
<b>Risk conclusion</b>	Not applicable
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	There are no recognized indigenous peoples in Romania

#### Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	21
No	
Yes	22
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
No inputs		43
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	23
No	
Yes	20
<b>Total</b>	<b>43</b>



What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondents
No input	# 43
<b>Total</b>	<b>43</b>

For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	12
No, mitigation measures for non-negligible indicators are not adequate	
Yes, mitigation measures for non-negligible indicators are adequate	4
No input	27
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent
No input	#
<b>Total general</b>	<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Neaplicabil	Organization	1
Non-applicable		
Nu am comentarii relevante în acest domeniu.	Expert/	
I have no relevant comments in this area.	Confidential	1
Nu sunt necesare măsuri de atenuare, deoarece riscul nu este aplicabil	Tudor	
Translation: No mitigation measures are required as the risk is not applicable	Stancioiu	1
No input		
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.

Risk indicator	44. Legal requirements related to the rights of Traditional Peoples are complied with.
Risk conclusion	Not applicable
Source types	all sources types
Risk threshold	
Short description of risks	There are no recognized Traditional peoples in Romania

#### Feedback from public consultation

Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized	#
N/A	21
No	
Yes	22
<b>Total</b>	<b>43</b>

What arguments / references / evidences can you provide for changing the risk conclusion?	Respondents
No input	# 43



<b>Total</b>	<b>43</b>
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<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	23
No	
Yes	20
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	9
No, mitigation measures for non-negligible indicators are not adequate	
Yes, mitigation measures for non-negligible indicators are adequate	5
No input	29
<b>Total</b>	<b>43</b>

<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent</b>	<b>#</b>
No input		43
<b>Total general</b>		<b>43</b>

<b>Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).</b>	<b>Respondent</b>	<b>#</b>
Neaplicabil	Organization	
Non-applicable		1
Nu am comentarii relevante în acest domeniu. Translation: I have no relevant comments in this area.	Expert/ Confidential	1
Nu sunt necesare măsuri de atenuare, deoarece riscul nu este aplicabil Translation: No mitigation measures are required as the risk is not applicable	Tudor Stancioiu	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential	1
No input		39
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ All the recorded stakeholders' opinions are in favor of the analysis, for this indicator.



<b>Risk indicator</b>	<b>45. The rights of Traditional Peoples, including land tenure and management, are respected and upheld according to the principles of FPIC.</b>
<b>Risk conclusion</b>	Not applicable
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	There are no recognized Traditional peoples in Romania

## Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	22
No	
Yes	21
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
No inputs		43
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	24
No	
Yes	19
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	10
No, mitigation measures for non-negligible indicators are not adequate	
Yes, mitigation measures for non-negligible indicators are adequate	5
No input	28
<b>Total</b>	<b>43</b>

<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent</b>	<b>#</b>
No input		43
<b>Total general</b>		<b>43</b>

<b>Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).</b>	<b>Respondent</b>	<b>#</b>
Neaplicabil	Organization	
Non-applicable		1



Nu am comentarii relevante în acest domeniu. I have no relevant comments in this area.	Expert/ Confidential	1
Nu sunt necesare măsuri de atenuare, deoarece riscul nu este aplicabil Translation: No mitigation measures are required as the risk is not applicable	Tudor Stancioiu	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential	1
No input		
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ All the recorded stakeholders' opinions are in favor of the analysis, for this indicator.

<b>Risk indicator</b>	<b>46. Legally recognised customary and community rights are identified and respected.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	The rights of local communities are recognised by the legislation and there is no evidence of regulation violations.

#### Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	18
No	2
Yes	23
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
No inputs		43
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	19
No	2
Yes	22
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	12
No, mitigation measures for non-negligible indicators are not adequate	3



Yes, mitigation measures for non-negligible indicators are adequate	6
No input	22
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
No input		
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Nu am comentarii relevante în acest domeniu. I have no relevant comments in this area.	Expert/ Confidential	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential	1
No input		
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ All the recorded stakeholders' opinions are in favor of the analysis, for this indicator.
- ☐ There are two answers in favor of non-negligible conclusion but no arguments are presented.

<b>Risk indicator</b>	<b>47. The rights of local communities are respected and upheld.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	There are well regulated conditions for the local communities to manifest their rights and there is no evidence of community rights being ignored.

#### Feedback from public consultation

Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized	#
N/A	19
No	2
Yes	22
<b>Total</b>	<b>43</b>

What arguments / references / evidences can you provide for changing the risk conclusion?	Respondents	#
Nu exista prevederi specifice in Codul Silvic privind protejarea ocupatiilor traditionale legate de produsele forestiere (dogarie, lingurari etc.) Translation: There are no specific provisions in the Forestry Code regarding the protection of traditional occupations related to forest products (woodworking, spooning, etc.)	Expert/confidentia l	1
<b>Total</b>		<b>43</b>



Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?	#
N/A	21
No	1
Yes	21
<b>Total</b>	<b>43</b>

What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondents	#
No input		43
<b>Total</b>		<b>43</b>

For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	12
No, mitigation measures for non-negligible indicators are not adequate	2
Yes, mitigation measures for non-negligible indicators are adequate	6
No input	23
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
No input		43
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Nu am comentarii relevante în acest domeniu. I have no relevant comments in this area.	Expert/ Confidential	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential	1
No input		
<b>Total general</b>		<b>43</b>

Comments received by emails:	Respondent	#
<b>47. The rights of local communities are respected and upheld</b>	WWF Romania	

Risc non-neglijabil

#### Argumentare / Descrierea riscului/Risk Description

Pe drumurile publice există restricții de tonaj impuse de administratori. Frecvent, la transportarea lemnului aceste restricții sunt încălcate. Nerespectarea restricției de tonaj contribuie la afectarea infrastructurii rutiere și civile, în detrimentul oamenilor și comunităților locale.

Colectarea lemnului prin traversarea terenurilor aparținând altor proprietari se face cu plata servituții de trecere și, după caz, a despăgubirilor stabilite prin înțelegerea părților. Datorită neclarității situației proprietăților, în multe situații înțelegerea părților nu are loc, astfel că nu se efectuează plata pentru servitutea de trecere și, după caz, a despăgubirilor. În timpul activității de exploatare a lemnului drepturile legale ale terților pot fi afectate prin:



- (i) suprapunerea căilor de scos-apropiat peste alte proprietăți,
- (ii) nerespectarea restricțiilor de tonaj la transportul materialului lemnos.

#### **Măsuri de atenuare a riscurilor:**

Obținerea acordului proprietarului / administratorului proprietatii.

Notificarea autoritatilor locale pentru obtinerea autorizatiei speciale de transport.

Automatic transation:

On public roads, weight restrictions are imposed by administrators. Frequently, these restrictions are violated during timber transportation. Failure to comply with weight restrictions contributes to the deterioration of road and civil infrastructure, negatively impacting local people and communities.

The collection of timber by crossing land belonging to other owners is done with the payment of a right-of-way fee and, where applicable, compensation as agreed by the parties. However, due to unclear property boundaries, agreements between the parties often do not occur, resulting in non-payment of the right-of-way fee and any applicable compensation.

During timber harvesting activities, the legal rights of third parties can be affected through:

- (i) overlapping skidding paths with other properties,
- (ii) non-compliance with weight restrictions during timber transport.


#### **Risk mitigation measures:**

- Obtaining the consent of the property owner/administrator.
- Notifying local authorities to obtain a special transport authorization.

#### **General comments on stakeholders' feedback**

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator.
- ☐ There is one comment referring to the fact that the Forest Code does not include provisions on the traditional occupations - thow there are separate laws dealing with aspects; there is also one comment on unclear ownership determining the unpaid use of privately owned roads and another comment on the improper use of public roads with consequences on local communities activity. They will be further analysed.

<b>Risk indicator</b>	<b>48. Interaction with Indigenous Peoples, Traditional Peoples and local communities is conducted in a respectful and culturally appropriate manner.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	There are well regulated conditions for the local communities to interact with forestry stakeholders, and there is no evidence of interactions not conducted in a respectful and culturally appropriate manner.

 Feedback from public consultation



Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized	#
N/A	20
No	
Yes	23
<b>Total</b>	<b>43</b>

What arguments / references / evidences can you provide for changing the risk conclusion?	Respondents	#
No inputs		43
<b>Total</b>		<b>43</b>

Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?	#
N/A	21
No	
Yes	22
<b>Total</b>	<b>43</b>

What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondents	#
No input		43
<b>Total</b>		<b>43</b>

For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	12
No, mitigation measures for non-negligible indicators are not adequate	
Yes, mitigation measures for non-negligible indicators are adequate	7
No input	24
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
No input		
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Nu am comentarii relevante în acest domeniu. I have no relevant comments in this area.	Expert/ Confidential	1
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential	1
No input		
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ All the recorded stakeholders' opinions are in favor of the analysis, for this indicator.



Indicator category: Trade and transport

<b>Risk indicator</b>	<b>49. Legal requirements related to the trade and transport of products are complied with.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	All the evidence indicates a solid general road transportation regulatory framework, with an effective implementation. The improved SUMAL regulatory framework decreased the probability of specific wood transportation regulations violation.

Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	16
No	2
Yes	25
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
No inputs		43
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	18
No	2
Yes	23
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	14
No, mitigation measures for non-negligible indicators are not adequate	2
Yes, mitigation measures for non-negligible indicators are adequate	6
No input	21
<b>Total</b>	<b>43</b>

<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent</b>	<b>#</b>
No input		43
<b>Total general</b>		<b>43</b>

<b>Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).</b>	<b>Respondent</b>	<b>#</b>
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Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential	1
No input		
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ All the recorded stakeholders' opinions are in favor of the analysis, for this indicator.
- ☐ There are two answers in favor of a non-negligible conclusion but no arguments are presented.

<b>Risk indicator</b>	<b>50. Legal requirements related to applicable trade restrictions and sanctions are complied with.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	The sound trade restrictions that are imposed by the legislation to public forest land are well enforced

#### Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	18
No	1
Yes	24
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	19
No	1
Yes	23
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	11
No, mitigation measures for non-negligible indicators are not adequate	2



Yes, mitigation measures for non-negligible indicators are adequate	7
No input	23
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
No input		43
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential	1
No input		42
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ All the recorded stakeholders' opinions are in favor of the analysis, for this indicator.
- ☐ There is one answer in favor of a non-negligible conclusion but no arguments are presented.

Risk indicator	51. Legal requirements related to the classification of products are complied with.
Risk conclusion	Negligible risk
Source types	all sources types
Risk threshold	
Short description of risks	The legislation as well as the digital wood traceability system SUMAL 2.0 make the use of illegal classification of products impossible.

#### Feedback from public consultation

Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized	#
N/A	17
No	1
Yes	25
<b>Total</b>	<b>43</b>

What arguments / references / evidences can you provide for changing the risk conclusion?	Respondents	#
No inputs		43
<b>Total</b>		<b>43</b>

Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?	#
N/A	19
No	1
Yes	23
<b>Total</b>	<b>43</b>



What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondents	#
No input		43
<b>Total</b>		<b>43</b>

For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	14
No, mitigation measures for non-negligible indicators are not adequate	1
Yes, mitigation measures for non-negligible indicators are adequate	6
No input	22
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
No input		43
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Nu am comentarii relevante în acest domeniu.	Expert/	1
I have no relevant comments in this area.	Confidential	
Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/	1
	Confidential	
No input		
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ All the recorded stakeholders' opinions are in favor of the analysis, for this indicator.
- ☐ There is one answer in favor of a non-negligible conclusion but no arguments are presented.

<b>Risk indicator</b>	<b>52. Legal requirements related to the export and/or import of products are complied with.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	The regulations have been improved and the analysed evidence indicates a low level of regulations violation related to export and/or import of products.

#### Feedback from public consultation

Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized	#
N/A	18
No	1
Yes	24
<b>Total</b>	<b>43</b>



What arguments / references / evidences can you provide for changing the risk conclusion?	Respondents	#
No inputs		43
<b>Total</b>		<b>43</b>

Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?	#
N/A	20
No	1
Yes	22
<b>Total</b>	<b>43</b>

What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondents	#
No input		43
<b>Total</b>		<b>43</b>

For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	12
No, mitigation measures for non-negligible indicators are not adequate	1
Yes, mitigation measures for non-negligible indicators are adequate	6
No input	24
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
No input		43
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Nu am comentarii relevante în acest domeniu.	Expert/	
I have no relevant comments in this area.	Confidential	1
No input		42
<b>Total general</b>		<b>43</b>

#### General comments on stakeholders' feedback

- ☐ All the recorded stakeholders' opinions are in favor of the analysis, for this indicator.
- ☐ There is one answer in favor of a non-negligible conclusion but no arguments are presented.

<b>Risk indicator</b>	<b>53. Legal requirements relating to offshore trading and transfer pricing are complied with.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	Romania adopted internationally recognised regulations in transfer pricing and significant progresses have been done in the area of enforcing transfer prices specific legislation in the last years, thus the risk is assessed as negligible.

#### Feedback from public consultation



Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized	#
N/A	19
No	
Yes	24
<b>Total</b>	<b>43</b>

What arguments / references / evidences can you provide for changing the risk conclusion?	Respondents	#
No inputs		43
<b>Total</b>		<b>43</b>

Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?	#
N/A	22
No	
Yes	21
<b>Total</b>	<b>43</b>

What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondents	#
No input		43
<b>Total</b>		<b>43</b>

For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	14
No, mitigation measures for non-negligible indicators are not adequate	1
Yes, mitigation measures for non-negligible indicators are adequate	4
No input	24
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
No input		43
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
Nu am idee despre speta in sina.		
I don't have relevant experience for this		1
No input		
<b>Total general</b>		<b>43</b>

General comments on stakeholders' feedback

- ☐ All the recorded stakeholders' opinions are in favor of the analysis, for this indicator.



Indicator category: Due diligence and due care

<b>Risk indicator</b>	<b>54. Legal requirements relating to due diligence or due care are complied with.</b>
<b>Risk conclusion</b>	Non-negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	54. 2. Violations of identified laws are not efficiently followed up on by the relevant entities
<b>Short description of risks</b>	Despite improvements in due diligence and due care since the 2017 CNRA evaluation, particularly in response to the European Commission's concerns, violations of identified laws are still not adequately addressed by relevant entities.
<b>Risk mitigation</b>	<ol style="list-style-type: none"> <li>Document Verification: Risk Maps <ul style="list-style-type: none"> <li>Create a robust risk assessment to identify risks related to companies failing to comply with legal requirements in areas such as corruption, management activities, occupational health and safety, working permits, and wages.</li> <li>Prioritize risks based on their likelihood and severity within the supply chain.</li> <li>Develop mitigation strategies based on risk mitigation measures recommended for indicators identified as non-negligible.</li> <li>Companies in the supply chain that have been involved in two or more failures to comply with legal requirements in the previous year will receive an additional training session within one month of the second incident to mitigate future risks. Repeated failures may lead to the exclusion of the company from the supply chain.</li> </ul> </li> </ol>

**Feedback from public consultation**

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	19
No	1
Yes	23
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
<p>Existența și actualizarea/upgradarea permanentă a sistemului SUMAL, cu perspectivele de îmbunătățire conform versiunii 3.0 (imagini satelitare, camere de supraveghere, tehnologie Lidar, funcționalitate în sistem offline, sisteme de monitorizare suplimentare pentru mijloacele de transport, măsurarea automată a volumului de lemn din mijlocul de transport etc) asigură un sprijin real pentru toți operatorii în vederea dezvoltării unui sistem propriu DDS, care să elimine sau diminueze riscurile introducerii pentru prima dată pe piața internă a lemnului recoltat ilegal sau a produselor derivate rezultate din acesta. În plus, nominalizarea Garzii Forestiere Naționale ca și autoritate competentă pentru punerea în aplicare a regulamentului EUDR (HG nr. 1029/2024), planificarea unor mecanisme eficiente de control intern sau extern (metodologie de control, cu prioritizarea controalelor în zonele expuse la risc), dublată de reglementarea unor măsuri drastice de sancționare a activităților ilegale, instruirile periodice ale angajaților, monitorizarea permanentă a modului în care sunt emise documentele de vânzare sau însoțire a materialului lemnos etc asigură un cadrul de reglementare suficient care poate demonstra preocupările continue pentru adaptarea la noile cerințe europene din domeniul silvicultură și exploatare forestiere. În plus, la nivel de țară, au fost adoptate o serie întreagă de acțiuni care să soluționeze chestiunea infrigementului pe păduri: revizuirea amenajamentelor silvice din prisma procedurii referitoare la evaluarea de mediu a acestora, elaborarea studiilor de evaluare adecvată și a rapoartelor de mediu, identificarea speciilor și habitatelor vulnerabile din Siturile Natura 2000, respectiv corelarea operațiunilor forestiere (tratamente, lucrări de îngrijiri etc) cu măsurile de conservare a acestor specii și habitate vulnerabile, adoptarea unor măsuri concrete de refacere a habitatelor forestiere deteriorate (O.M. nr. 1063/2024), migragrea către SUMAL 3.0 etc. Toate aceste aspecte demonstrează progresul real făcut de România în ultimii ani în ceea ce privește domeniul</p>	Laurentiu Mihaila RNP-Romsilva	1



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referitor la păduri, scăderea continuă a volumului lemnului tăiat ilegal în România fiind doar unul din rezultatele acestor preocupări. În majoritatea cazurilor, acuzațiile referitoare la tăierile ilegale din România, apărute în mass media și preluate ulterior și în diferite publicații internaționale, se dovedesc, în urma unor controale efectuate în teren, ca fiind nefondate și nerealiste, aducând grave prejudicii de imagine sectorului forestier. Cifrele oficiale furnizate de instituțiile statului (Garda Forestieră, INS, RNP etc) demonstrează că tăierile ilegale din România sunt la un nivel mult inferior față de cel adus în spațiu public de diverse entități private, cu diverse interese mai mult sau mai puțin cunoscute.

La nivelul RNP-Romsilva, există implementat deja, de foarte mult timp, un sistem eficient Due Dilligence, care se actualizează/revizuieste permanent, corelat cu schimbările legislative și cu potențialele riscuri ce pot fi identificate pe parcursul implementării lui. Totodată volumul tăierilor ilegale în ultimii 10 ani, stabilit în urma controalelor efectuate în teren, demonstrează un trend descendent - de la un volum de cca 57 mii mc în anul 2014 la cca 23 mii în anul 2023, în fondul forestier proprietate publică a statului. Aceeași tendință se manifestă și în suprafețele de pădure aparținând altor deținători (primării, biserici, persoane juridice, persoane fizice), care au încheiat contracte de administrare sau prestări servicii cu RNP Romsilva pentru acele suprafețe (de la cca 28 mii mc cubi tăiașim ilegal în anul 2014, la cca 14 mii mc tăiașim ilegal în anul 2023).

Având în vedere cele precizate anterior, ne menținem punctul de vedere emis în cadrul Grupului de lucru - cel referitor la încadrarea ca risc neglijabil al indicatorului legat de sistemul Due Dilligence.

Translation: The existence and permanent updating/upgrading of the SUMAL system, with the prospects of improvement according to version 3.0 (satellite images, surveillance cameras, Lidar technology, functionality in the offline system, additional monitoring systems for means of transport, automatic measurement of the volume of wood in the middle of transport, etc.) provides real support for all operators in order to develop their own DDS system, which would eliminate or reduce the risks of introducing illegally harvested wood for the first time on the domestic market or derived products resulting from it. In addition, the nomination of the National Forestry Guard as the competent authority for the implementation of the EUDR regulation (HG no. 1029/2024), the planning of effective internal or external control mechanisms (control methodology, with prioritization of controls in areas exposed to risk), doubled by the regulation of drastic measures to sanction illegal activities, periodic training of employees, permanent monitoring of the way in which sales documents are issued or accompanying wood material, etc. ensures a sufficient regulatory framework that can demonstrate the ongoing concerns for adapting to the new European requirements in the field of forestry and forest exploitation. In addition, at the country level, a whole series of actions have been adopted to solve the issue of encroachment on forests: the review of forestry facilities in the light of the procedure related to their environmental assessment, the development of appropriate assessment studies and environmental reports, the identification species and vulnerable habitats in Natura 2000 Sites, respectively the correlation of forestry operations (treatments, maintenance works, etc.) with conservation measures for these species and habitats vulnerable, the adoption of concrete measures to restore damaged forest habitats (O.M. no. 1063/2024), migration to SUMAL 3.0, etc. All these aspects demonstrate the real progress made by Romania in recent years in the field related to forests, the continuous decrease in the volume of illegally cut wood in Romania being only one of the results of these concerns. In most cases, the accusations regarding illegal logging in Romania, which appeared in the mass media and were later picked up in various international publications, are proven, following checks carried out in the field, to be unfounded and unreal, causing serious damage to the image of the forestry sector.

The official figures provided by the state institutions (Forest Guard, INS, RNP, etc.) demonstrate that illegal logging in Romania is at a much lower level than that brought into the public space by various private entities, with various more or less known interests.

At the RNP-Romsilva level, there has already been implemented, for a very long time, an effective Due Diligence system, which is constantly updated/revised, correlated with legislative changes and with the potential risks that can be identified during its implementation. At the same time, the volume of illegal cuttings in the last 10 years, established following the controls carried out in the field, demonstrates a downward trend - from a volume of approx. 57 thousand cubic meters in 2014 to approx. 23 thousand cubic meters in 2023, in the forest fund owned by the state. The same trend is also manifested in the forest areas belonging to other holders (town halls, churches, legal entities, natural

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persons), who have signed management or service contracts with RNP Romsilva for those areas (from approx. 28 thousand cubic meters we cut illegally in year 2014, at approx. 14 thousand m3 illegally cut in 2023).

Considering the above, we maintain our point of view issued within the Working Group - the one regarding the classification of the indicator related to the Due Diligence system as a negligible risk.

<b>Total</b>	<b>43</b>
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<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
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N/A	21
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No	
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Yes	22
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<b>Total</b>	<b>43</b>
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<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
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No input		43
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<b>Total</b>	<b>43</b>
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<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
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No need for mitigation measures, as I consider the risk as being negligible	1
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No, mitigation measures for non-negligible indicators are not adequate	3
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Yes, mitigation measures for non-negligible indicators are adequate	17
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No input	22
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<b>Total</b>	<b>43</b>
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<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent</b>	<b>#</b>
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Achizitionarea de lemn certificate	Mihai Boghean	
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Buy certified timber		1
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No input		42
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<b>Total general</b>	<b>43</b>
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<b>Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).</b>	<b>Respondent</b>	<b>#</b>
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Denumirea indicatorului este: 54. Legal requirements relating to due diligence or due care are complied with.	Organization	1
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Sursele de evaluare a acestui risc au fost identificate în mod corespunzător. Descriere riscului corespunde situației actuale la nivel național. Încadrarea este corectă. Translation: The sources of this risk assessment have been identified accordingly. The description of the risk corresponds to the current situation at the national level. The framing is correct.	Expert/ Confidential	1
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No input		41
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<b>Total general</b>	<b>43</b>
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<b>Comments received by emails:</b>	<b>Respondent</b>	<b>#</b>
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54. Legal requirements relating to due diligence or due care are complied with.	WWF Romania	
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Risc non-neglijabil

**Argumentare / Descrierea riscului:**

Operatori care nu au un manual de proceduri DDS.

Registru de evidenta a controalelor, cu inregistrarea / clasarea masurilor impuse in urma acestora.



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**Măsuri de atenuare a riscurilor:**

Verificarea implementării / actualizării manualului de proceduri DDS.

Verificarea implementării măsurilor impuse în urma controalelor efectuate de autorități.

Actualizarea hărții zonelor de risc.

Automatic translation:

**Argumentation / Description of the risk:**

Operators who do not have a DDS procedures manual.

Register of control records, with the recording/ranking of the measures imposed as a result of them.

**Risk mitigation measures:**

Verification of the implementation / update of the DDS procedures manual.

Verification of the implementation of the measures imposed following the controls carried out by the authorities.

Updating the map of risk areas.

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**General comments on stakeholders' feedback**

- ☐ The stakeholders' consultation pointed to the fact that the assessment for this indicator is challenging as opinions on the improvement in the DDS implementation in Romania are clearly underlined by the position of RNP-Romsilva. Moreover, WWF Romania considers that the risk exists only for operators that do not have a DDS procedure manual.
- ☐ These opinions will be further assessed in the revision of the CNRA



Indicator category: Conversion and forest degradation

<b>Risk indicator</b>	<b>55. There is no conversion from natural forest and no transformation of plantations to agricultural use since 31 December 2020.</b>
<b>Thresholds</b>	55. 1. Evidence indicates that conversion from natural forest and/or transformation of plantations to agricultural use is occurring.
<b>Risk conclusion</b>	<b>Non-negligible risk</b>
<b>Source types</b>	all sources types
<b>Risk threshold</b>	55. 1. Evidence indicates that conversion from natural forest and/or transformation of plantations to agricultural use is occurring.
<b>Short description of risks</b>	The Romanian Forest Code (L18/2008) prohibits conversion of forests from National Forest Fund and there is no practice in this sense. However, considering the provisions of <FSC-POL-01-007 Policy to Address Conversion> the precautionary approach shall be applied for the assessment of indicator 55; thus, a 'non-negligible' risk designation shall be concluded
<b>Risk mitigation</b>	1. Document verification: Volume evaluation document (APV) needs to be checked to prove that it is sourced from forests included in the NFF; APVs from forest vegetations from outside NFF should be recorded as inputs from agricultural land use sources.

Feedback from public consultation

**Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized**

	<b>#</b>
N/A	17
No	13
Yes	13
<b>Total</b>	<b>43</b>

**What arguments / references / evidences can you provide for changing the risk conclusion?**

**Respondents**

Abordarea precaută nu aduce automat clasificarea ca risc. Iar lipsa evidențelor (dovezilor) cerute de indicatorul 5.1 („Dovezile indică faptul că are loc conversia din pădure naturală și/sau transformarea plantațiilor în uz agricol”) arată clar că nu există risc. Deci nu doar existența prevederilor legale stricte ci și lipsa încălcării acestor prevederi Masa lemnoasă provenită din afara fondului forestier nu este din conversii ale pădurilor naturale și nici a plantațiilor spre folosința agricolă ci reprezintă o activitate prin care se menține folosința agricolă (și oricum, în cele mai multe cazuri, reprezintă extragerea parțială a vegetației lemnoase). Toate aceste extrageri sunt făcute prin sistemul legal de marcare și inventariere de către un ocol silvic specializat (deci sunt controlate ca intensitate și proveniență legală). Deci nu există niciun motiv (nici măcar în numele abordării precaute) pentru a considera ca riscul este ne-neglijabil

Tudor  
Stancioiu

Translation: Precautionary approach does not automatically result in risk classification. And the lack of records (evidence) required by indicator 5.1 ("Evidence indicates that conversion from natural forest and/or transformation of plantations to agricultural use is taking place") clearly shows that there is no risk. So not only the existence of strict legal provisions but also the absence of violation of these provisions

Wood mass originating from outside the forest fund is not from conversions of natural forests or plantations for agricultural use, but represents an activity through which agricultural use is maintained (and anyway, in most cases, it represents the partial extraction of woody vegetation). All these extractions are done through the legal system of marking and inventorying by a specialized forestry detour (so they are controlled as to intensity and legal provenance). So there is no reason (not even in the name of the cautious approach) to consider the risk to be non-negligible



<p>Având în vedere descrierea riscului și a cerințelor legale aferente evaluării riscului consider că dovezile expuse de către grupul de lucru sunt relevante în favoarea încadrării ca risc neglijabil și în niciun caz ne-neglijabil.</p> <p>Translation: Considering the description of the risk and the legal requirements related to the risk assessment, I consider that the evidence presented by the working group is relevant in favor of the classification as a negligible and in no case non-negligible risk.</p>	Expert/ Confidential
<p>Având în vedere legislația și practicile din România, menționate la capitolul de descriere a riscului, care nu permit conversia pădurilor naturale în plantații sau utilizări agricole, mi se pare absurd ca acest risc să fie considerat implicit ne-neglijabil, cu justificarea principiului precauției. Menținând această logică, nu mai avem nevoie de CNRA și toate riscurile pot fi considerate implicit ne-neglijabile.</p> <p>Translation: Considering the legislation and practices in Romania, mentioned in the risk description chapter, which do not allow the conversion of natural forests into plantations or agricultural uses, it seems absurd to me that this risk should be implicitly considered non-negligible, with the justification of the precautionary principle. Keeping this logic, we no longer need the CNRA and all risks can be implicitly considered non-negligible.</p>	Bogdan Banica
<p>Certificarea managementului forestier în România se realizează doar pentru pădurile din fond forestier. Evident, poate exista un risc al amestecului lemnului certificat cu cel necertificat (provenit poate de pe terenuri din afara FFN rezultat dintr-o astfel de conversie), dar acest risc nu are legătură cu conversia descrisă la acest indicator. Din punctul meu de vedere, o confuzie de termeni nu trebuie să conducă aici la o încadrare neadekvată. Consider că în FFN și, deci, pentru pădurile din România certificate FSC, acest risc este neglijabil. Comparați cu alte state din Europa, unde schimbarea destinației terenului se face foarte ușor. Vedeți cum au încadrat ei acest risc.</p> <p>Translation: The certification of forest management in Romania is carried out only for the forests of the forest fund. Obviously, there may be a risk of mixing certified and non-certified wood (perhaps from lands outside the FFN resulting from such a conversion), but this risk has nothing to do with the conversion described in this indicator. In my view, a confusion of terms should not lead to an inappropriate classification here. I believe that in FFN and, therefore, for FSC-certified forests in Romania, this risk is negligible. Compare with other countries in Europe, where changing the destination of the land is very easy. See how they framed this risk.</p>	Expert/ Confidential
<p>Conversia pădurilor în terenuri cu altă destinație (agricultură) este un aspect total nesemnificativ și irelevant în România, prin Codul Silvic fiind interzisă reducerea suprafeței fondului forestier, cu câteva excepții, agricultura nefiind însă una dintre aceste excepții. În mod concret, la nivelul RNP- Romsilva, în perioada 2021-2024 nu a avut loc nicio astfel de conversie a suprafețelor de pădure în terenuri agricole, majoritatea situațiilor în care au fost înregistrate „conversii” (scoateri definitive din fondul forestier național) fiind reprezentate de realizarea/construcția unor proiecte de infrastructură, adesea declarate de interes național și de utilitate publică (ex. autostrăzi, drumuri naționale, aducțiuni de apă, rețele de electricitate, construcția unor pârtii de ski, realizarea unor obiective turistice, construcția unor obiective de interes social - cimitire etc). În unele situații, în funcție de obiectivul investiției, pentru terenurile scoase definitiv din fondul forestier au fost oferite în compensare terenuri cu alte destinații, care au fost ulterior împădurite, fără a fi diminuată astfel suprafața de fond forestier național. În orice caz, suprafața cumulată a unor astfel de terenuri scoase definitiv din fondul forestier național este extrem de redusă (cca 80 ha în anul 2021, cca 104 ha în anul 2022, cca 90 ha în anul 2023 și cca 52 ha în anul 2024) comparativ cu suprafața totală a fondului forestier național (cca. 6,7 milioane ha, din care cca 3,1 milioane ha reprezintă fond forestier proprietate publică a statului), nefiind astfel creat niciun impact asupra pădurilor. Din aceste motive, consideram că pentru acest indicator riscul trebuie menținut la nivelul neglijabil, indiferent de politicile și procedurile FSC referitoare la conversie, care solicită desemnarea implicită a acestui indicator la nivelul neneglijabil.</p>	Laurentiu Mihaila RNP- Romsilva
<p>Translation: The conversion of forests into lands with another destination (agriculture) is a totally insignificant and irrelevant aspect in Romania, the Forestry Code prohibiting the reduction of the area of the forest fund, with a few exceptions, agriculture not being one of these exceptions. Concretely, at the RNP-Romsilva level, in the period 2021-2024 there was no such conversion of forest areas into agricultural land, most of the situations in which "conversions" were recorded (definitive removals from the national forest fund) being represented by the realization/construction of infrastructure projects, often declared to be of national interest and of public utility (e.g. highways, national roads, water intakes,</p>	



<p>networks of electricity, the construction of ski slopes, the realization of tourist objectives, the construction of objectives of social interest - cemeteries, etc.). In some situations, depending on the objective of the investment, for the lands definitively removed from the forest fund, lands with other destinations were offered as compensation, which were later reforested, without thus diminishing the area of the national forest fund. In any case, the cumulative surface of such lands permanently removed from the national forest fund is extremely small (approx. 80 ha in 2021, approx. 104 ha in 2022, approx. 90 ha in 2023 and approx. 52 ha in 2024) compared to the total surface area of the national forest fund (approx. 6.7 million ha, of which approx. 3.1 million ha is the publicly owned forest fund of the state), thus not creating any impact on the forests.</p> <p>For these reasons, we consider that for this indicator the risk should be kept at the negligible level, regardless of the FSC policies and procedures regarding conversion, which require the default designation of this indicator at the non-negligible level.</p>	
<p>Convertirea suprafețelor de fond forestier în teren agricol sau altă folosință este un risk neglijabil (&lt;0.1% în ultimii 22 ani cf. Global Forest Watch)</p> <p><a href="https://www.globalforestwatch.org/dashboards/country/ROU/?map=eyJjYW5Cb3VuZCI6dHJ1ZX0%3D">https://www.globalforestwatch.org/dashboards/country/ROU/?map=eyJjYW5Cb3VuZCI6dHJ1ZX0%3D</a></p> <p>În comparație cu alte țări din Europa : Germania - 0.14% , Sweden &lt; 0.1% , France - 0.25% , most of EU countries are in &lt;0.1% range , excepting Finland which has - 0 ha deforestation.</p> <p>Translation: The conversion of forest fund areas into agricultural land or other use is a negligible risk (&lt;0.1% in the last 22 years cf. Global Forest Watch)</p> <p><a href="https://www.globalforestwatch.org/dashboards/country/ROU/?map=eyJjYW5Cb3VuZCI6dHJ1ZX0%3D">https://www.globalforestwatch.org/dashboards/country/ROU/?map=eyJjYW5Cb3VuZCI6dHJ1ZX0%3D</a>.</p> <p>In comparison with other European countries: Germany - 0.14%, Sweden &lt; 0.1%, France - 0.25%, most of EU countries are in &lt;0.1% range, except Finland which has - 0 ha deforestation.</p>	Organization / confidential
<p>Este foarte clar că în România nu a existat conversie din pădure naturală în teren agricol. Articolul 16.3 nu ar trebui să se aplice în cazul țărilor precum România.</p> <p>Translation: It is very clear that in Romania there was no conversion from natural forest to agricultural land. Article 16.3 should not apply to countries such as Romania.</p>	Mihai Boghean
<p>În pădurile din fondul forestier național, defrișarea pădurilor în vederea conversiei acestora în terenuri agricole este interzisă și nu este o practică în acest sens. Vegetația forestieră din afara fondului forestier național, sunt terenuri cu destinație agricolă și nu "ar trebui să fie considerate păduri" INS în "Statistica activităților în silvicultură", suprafața pădurilor incluse în fondul forestier național este în permanentă creștere.</p> <p>Translation: In the forests of the national forest fund, deforestation for the purpose of converting them into agricultural land is prohibited and is not a practice in this sense.</p> <p>· Forest vegetation outside the national forest fund, are agricultural land and should not "be considered forests" INS (National Institute of Statistics) in "Statistics of forestry activities", the area of forests included in the national forest fund is constantly increasing.</p>	FSC Romania
<p>Legislația din România este extrem de strictă în privința schimbării destinației terenurilor din fondul forestier. Dată fiind importanța acestui indicator, considerăm că este absolut necesară revizuirea concluziilor și încadrarea indicatorului în categoria risc neglijabil.</p> <p>Translation: Legislation in Romania is extremely strict regarding the change of land use in the forest fund. Given the importance of this indicator, we believe that it is absolutely necessary to review the conclusions and classify the indicator in the category of negligible risk.</p>	Grupul pentru Dialog Forestier
<p>Norme Cadastrul General ( OM 534/2001 ) : 7.2.1. Din categoria terenurilor cu destinație agricolă fac parte: terenurile arabile, viile, livezile, pepinierele viticole, pomicole, plantațiile de hamei și duzi, pășunile, fânețele, serele, solariile, răsadnițele, terenurile cu vegetație forestieră, dacă nu fac parte din amenajamente silvice, pășunile împădurite, cele ocupate cu construcții agrozootehnice și de îmbunătățiri funciare, amenajările piscicole, drumurile tehnologice și de depozitare.</p> <p>8.2.2. Pășuni (P) c) pășuni împădurite - pășunile care în afară de vegetație ierboasă sunt acoperite și cu vegetație forestieră, cu diferite grade de consistență</p> <p>8.2.6. Păduri și alte terenuri forestiere. În această categorie de folosință intră toate terenurile care sunt cuprinse în amenajamentele silvice și în afara acestora, indiferent de proprietar.</p> <p>Se înregistrează la această categorie de folosință:</p>	Organization / confidential



a) păduri - terenuri acoperite cu vegetație forestieră, cu o suprafață mai mare de 0,25 ha;

Codul Silvic Art. 24. - (1) În cazul vegetației forestiere de pe terenuri din afara fondului forestier, așa cum este definită în prezentul cod, și a oricăror altor terenuri, proprietarul poate opta pentru includerea lor în fondul forestier național, situație în care se întocmește amenajament silvic sau se includ într-un amenajament silvic existent. (2) Schimbarea destinației terenurilor prevăzute la alin. (1) se aprobă prin ordin al conducătorului autorității publice centrale care răspunde de silvicultură și este scutită de taxe și impozite.

Translation: Rules of the General Cadastre (OM 534/2001): 7.2.1. The category of agricultural land includes: arable land, vineyards, orchards, wine nurseries, fruit trees, hop and mulberry plantations, pastures, hayfields, greenhouses, solariums, nurseries, land with forest vegetation, if they are not part of forestry, wooded pastures, those occupied with agro-zootechnical constructions and land improvements, fisheries facilities, technological roads and storage.

8.2.2. Pastures (P) c) wooded pastures - pastures that, apart from grassy vegetation, are also covered with forest vegetation, with different degrees of consistency

8.2.6. Forests and other forest lands. This category of use includes all the lands that are included in the forestry facilities and outside them, regardless of the owner. It is registered in this category of use:

It is registered in this category of use:

a) forests - lands covered with forest vegetation, with an area greater than 0.25 ha;

Forestry Code Art. 24. - (1) In the case of forest vegetation on lands outside the forest fund, as defined in this code, and any other lands, the owner may opt for their inclusion in the national forest fund, in which case a forestry plan is drawn up or are included in an existing forest management.

(2) Changing the destination of the lands provided for in para. (1) is approved by order of the head of the central public authority responsible for forestry and is exempt from taxes and duties.

Nu am cunoștiință de astfel de situatii, cu atât mai mult după 2020.

I am not aware of such situations, even more so after 2020

Organization /  
confidential

Principial, cred ca trebuie aratat, prin inserare, in mod explicit, la 'Descrierea cerintelor legale', ca L.nr.46/2008 dispune, in mod implicit, la art.36 si respectiv 37, ca este interzisa schimbarea destinatiei forestiere a terenurilor in destinatie agricola. Pe cale de consecinta, nu poate fi schimbata, pe cale legala, destinatia forestiera a unor terenuri in destinatie agricola. Pe de alta parte, amenajamentele silvice, respectiv produsele "harti" ale acestora, sunt realizate prin folosirea sistemului cartografic Stereo 70, care este acelasi cu cel folosit pentru lucrarile de cadastru si, respectiv, de intabulare a dreptului de proprietate. Aceste date (caracteristicile topografice) sunt inregistrate in sistemul SUMAL si sunt la dispozitia Garzii Forestiere. Pe cale de consecinta, organele de control ale statului in domeniul forestier (Garzile Forestiere) au posibilitatea de a constata, in timp real, daca, intr-un anumit amplasament, a fost modificata configuratia, respectiv conturul terenului forestier, prin accesarea bazei de date SUMAL. Aceasta eventuala modificare a conturului terenului forestier, prin diminuarea suprafetei acestuia, in alte conditii decat cele dispuse de art. 36 si respectiv art.37 ale Codului silvic, constituie infractiunea de reducere a suprafetei fondului forestier national, asa cum este definita de art.106 Cod silvic. In cazul savarsirii acestei infractiuni, terenul caruia i s-a schimbat, in mod ilegal, destinatia, reintra in circuitul forestier (art. 106, alin.(4) Cod silvic). Concluzia este ca, legal, nu poate fi schimbata destinatia forestiera in destinatie agricola, iar daca se realizeaza ilegal, fapta constituie infractiune care se sanctioneaza cu amenda penala sau cu privarea de libertate.

Translation: Mainly, I think it should be shown, by inserting, explicitly, in the "Description of legal requirements", that L.nr. 46/2008 provides, implicitly, in art. 36 and respectively 37, that it is forbidden to change the forest destination of of lands in agricultural use. As a consequence, the forest use of some lands in agricultural use cannot be changed.

On the other hand, the forestry arrangements, respectively their "map" products, are made by using the Stereo 70 cartographic system, which is the same as the one used for the cadastre works and, respectively, for the tabulation of property rights. These data (topographic characteristics) are registered in the SUMAL system and are available to the Forest Guard. As a consequence, the state control bodies in the forestry field (Forest Guards) have the possibility to ascertain, in real time, if, in a certain location, the configuration, respectively the outline of the forest land, has been changed, by accessing



the database SUM. This eventual modification of the contour of the forest land, by reducing its surface, under conditions other than those provided by art. 36 and respectively art. 37 of the Forestry Code, constitute the offense of reducing the area of the national forest fund, as defined by art. 106 of the Forestry Code. In the event of the commission of this crime, the land whose destination has been illegally changed, re-enters the forestry circuit (art. 106, par. (4) Forestry Code).

The conclusion is that, legally, the forest destination cannot be changed to an agricultural destination, and if it is done illegally, the act constitutes a crime punishable by a criminal fine or deprivation of liberty.

<b>Total</b>	<b>43</b>
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**Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?**

	<b>#</b>
N/A	21
No	6
Yes	16

<b>Total</b>	<b>43</b>
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**What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?**

<b>Respondents</b>	<b>#</b>
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Consider că justificarea principiului precauției pentru evaluarea acestui risc implicit ne-neglijabil este în contradicție cu acest demers de identificare pertinentă și profesionistă a riscurilor și a măsurilor de identificare a riscurilor.

Bogdan  
Banica

Translation: I believe that the justification of the precautionary principle for the assessment of this non-negligible implicit risk is in contradiction with this approach of pertinent and professional risk identification and risk identification measures.

Convertirea suprafețelor de fond forestier în teren agricol sau altă folosință este un risk neglijabil (<0.1% în ultimii 22 ani cf. Global Forest Watch) <https://www.globalforestwatch.org/dashboards/country/ROU/?map=eyJjYW5Cb3VuZCI6dHJ1ZX0%3D>

Organization /  
confidential

In comparație cu alte țări din Europa : Germania - 0.14% , Sweden < 0.1% , France - 0.25% , most of EU countries are in <0.1% range , excepting Finland which has - 0 ha deforestation

Translation: The conversion of forest fund areas into agricultural land or other use is a negligible risk (<0.1% in the last 22 years cf. Global Forest Watch)

<https://www.globalforestwatch.org/dashboards/country/ROU/?map=eyJjYW5Cb3VuZCI6dHJ1ZX0%3D> .In comparison with other European countries: Germany - 0.14%, Sweden < 0.1%, France - 0.25%, most of EU countries are in <0.1% range, except Finland which has - 0 ha deforestation

În prezent GDF nu are cunoștință de existența dovezi concrete de încălcare a reglementărilor, din nici un fel de surse, oficiale sau neoficiale. Considerăm că nu trebuie furnizate dovezi că nu există încălcări ale reglementărilor, ceea ce de altfel este imposibil de realizat în termeni practici, ci instituțiile sau organizațiile care susțin contrariul ar trebui să facă publice datele pe care le dețin despre astfel de situații.

Grupul pentru  
Dialog  
Forestier

Translation: Currently, GDF is not aware of the existence of concrete evidence of violation of regulations, from any kind of sources, official or unofficial. We believe that evidence that there are no violations of regulations should not be provided, which is otherwise impossible to achieve in practical terms, but institutions or organizations that claim otherwise should make public the data they hold about such situations.

Nestiind sursele de la care s-au obtinut informatii privind "conversia", nu pot formula critici la aceste afirmatii. Cred ca o solicitare de informatii de la MMAP pe acest subiect va aduce argumente pt. ca riscul sa poata sa fie incadrat ca neglijabil.

Viorel  
Marinescu

Translation: Not knowing the sources from which the information regarding the "conversion" was obtained, I cannot criticize these statements. I think that a request for information from MMAP on this subject will bring arguments for so that the risk can be classified as negligible.

OM 534/2001 - Norma tehnica pentru introducerea cadastrului general. Suprafețele din AFF fiind încadrate ca având folosință agricolă nu pot fi reîncadrate în baza unei definiții fără încălcarea dreptului de proprietate

Organization /  
confidential

Translation: OM 534/2001 - Technical norm for the introduction of the general cadastre.



The surfaces in the AFF being classified as having agricultural use cannot be reclassified based on a definition without violating property rights	
No input	
<b>Total</b>	<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	12
No, mitigation measures for non-negligible indicators are not adequate	3
Yes, mitigation measures for non-negligible indicators are adequate	7
No input	21
<b>Total</b>	<b>43</b>

<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent</b>	<b>#</b>
Sunt terenuri agricole (de genul pășunilor) care încep să devină păduri. Ar trebui ca legislația să fie mai strictă în aceste cazuri. Translation: There are agricultural lands (like pastures) that are starting to become forests. The legislation should be stricter in these cases.	Asociația ALIANȚĂ PENTRU PĂDURE	1
No input		42
<b>Total general</b>		<b>43</b>

<b>Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).</b>	<b>Respondent</b>	<b>#</b>
Ar fi fost mai util să se sublinieze direct faptul că legislația (Codul Silvic) interzice (fără excepții!!) transformarea suprafețelor de pădure în terenuri agricole. Menționarea excepțiilor (precum exploatarea resurselor naturale, turismul și recreerea, locuințe) deși nu menționează acest caz, probabil a creat confuzie. Translation: It would have been more useful to point out directly that the legislation (Forestry Code) prohibits (without exceptions!!) the transformation of forest areas into agricultural land. Mention of exceptions (such as exploitation of natural resources, tourism and recreation, housing) although not mentioning this case, probably created confusion.	Tudor Stancioiu	
Consider că evaluarea unor riscuri implicit ne-neglijabile, împotriva evidențelor, va duce la slăbirea sistemului de certificare FSC - suplimentează inutil birocrăția fără nici un efect benefic și transformă inutil în „suspect” orice operator din România. Translation: I believe that the evaluation of implicitly non-negligible risks, against the records, will lead to the weakening of the FSC certification system - it unnecessarily supplements the bureaucracy without any beneficial effect and unnecessarily turns any operator in Romania into a "suspect".	Bogdan Banica	
Nu am comentarii relevante, riscul este neglijabil. I have no relevant comments, the risk is negligible.	Expert/confidential	
O observatie, care este valabila pentru totii indicatorii in care este invocat Codul silvic, este ca referinta trebuie facuta la Legea nr 46/2008, Republicata, cu modificarile ulterioare. Se invoca, in mod repetat (la multi indicatori), in mod eronat, ca fiind Codul sivic, Legea 18/2008, Legea nr.46/2018. Translation: An observation, which is valid for all the indicators in which the Forestry Code is invoked, is that reference must be made to Law no. 46/2008, Republiced, with subsequent amendments. It is invoked, repeatedly (on many indicators), erroneously, as being the Forest Code, Law 18/2008, Law no. 46/2018.	Viorel Marinescu	
Scoaterea din fond forestier insemna transformarea din padure naturala in uz agricol, prin aplicarea prevederilor legale legate de scoaterea din fond forestier se asigura mentinerea (extinderea) suprafetei fondului forestier Translation: Removal from the forest fund means the transformation from natural forest to agricultural use, by applying the legal provisions related to the removal from the forest fund, the maintenance (expansion) of the surface of the forest fund is ensured	Expert/confidential	
No input		
<b>Total general</b>		<b>43</b>



Comments received by emails:	Respondent	#
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**55. There is no conversion from natural forest and no transformation of plantations to agricultural use since 31 December 2020.**

WWF  
Romania

*Risc neglijabil*

#### **Argumentare / Descrierea riscului:**

Complementar evaluărilor preliminare (<https://wwf.ro/paduri/riscurile-comercializarii-lemnului-pe-piata-ue/>) realizate de WWF printr-un proces participativ, argumentăm faptul că riscul privind „conversia” pădurilor în România poate fi considerat neglijabil:

- ~ În mod specific, la nivel național, cea mai mare parte din suprafețele acoperite cu vegetație forestieră din afara fondului forestier național, identificate prin EU Forest Observatory, sunt terenuri agricole ce formează peisaje mozaicate silvo-pastorale și nu întrunesc principalele elemente caracteristice „pădurilor naturale” (cum ar fi complexitatea, structura și diversitatea biologică, inclusiv caracteristicile solului, flora sau chiar fauna). Extinderea suprafețelor acoperite cu vegetație forestieră din afara fondului forestier național se datorează în principal reducerii activităților agricole (nu au mai fost utilizate intensiv ca pășuni sau fânețe), din cauza problemelor legate de succesiune și abandonarea treptată, cauzată de imposibilitatea dezvoltării unor investiții din fonduri publice sau bancabile.
- ~ Toate cazurile documentate de WWF înainte de 2018 legate de „forest cover loss” (<https://data.globalforestwatch.org/>) în afara fondului forestier național au survenit ca urmare a „curățării terenurilor” agricole (pășuni sau fânețe) de vegetația lemnoasă, ca efect al penalităților impuse de APIA pentru neîngrijirea terenurilor agricole.
- ~ În România, „defrișarea” / „conversia” pădurilor naturale în terenuri agricole nu este justificată nici măcar din rațiuni economice (având în vedere costul ridicat al defrișărilor comparativ cu prețul scăzut de vânzare al terenurilor agricole). Mai mult, conversia pădurilor naturale din fondul forestier național în terenuri agricole este interzisă prin lege și nu există astfel de situații la nivel național.
- ~ Riscul privind conversia pădurilor naturale intervenita prin degradarea pădurilor, fie ea graduală sau apărută printr-o transformare rapidă, poate fi considerat neglijabil (vezi comentariile aferente indicatorului care abordează „degradarea pădurilor”).

#### **Măsuri de atenuare a riscurilor:**

*Nu este cazul*

#### **Automatic translation**

#### **Argumentation / Description of the risk:**

Complementary to the preliminary assessments (<https://wwf.ro/paduri/riscurile-comercializarii-lemnului-pe-piata-ue/>) carried out by WWF through a participatory process, we argue that the risk regarding the "conversion" of forests in Romania can be considered negligible:

- Specifically, at the national level, most of the areas covered with forest vegetation outside the national forest fund, identified by the EU Forest Observatory, are agricultural lands that form silvo-pastoral mosaic landscapes and do not meet the main characteristic elements of "natural forests" (such as complexity, structure and biological diversity, including soil characteristics, flora or even fauna). The expansion of the areas covered with forest vegetation outside the national forest fund is mainly due to the reduction of agricultural activities (they were no longer used intensively as pastures or hayfields), due to problems related to succession



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and gradual abandonment, caused by the impossibility of developing some investments from public funds or bankable.

- All cases documented by WWF before 2018 related to "forest cover loss" (<https://data.globalforestwatch.org/> ) outside the national forest fund occurred as a result of the "clearing of agricultural lands" (pastures or hayfields) of vegetation woody, as a result of the penalties imposed by APIA for not taking care of agricultural land.
- In Romania, the "deforestation" / "conversion" of natural forests into agricultural land is not even justified for economic reasons (considering the high cost of deforestation compared to the low selling price of agricultural land). Moreover, the conversion of natural forests from the national forest fund into agricultural land is prohibited by law and there are no such situations at the national level.
- The risk regarding the conversion of natural forests through forest degradation, be it gradual or occurring through a rapid transformation, can be considered negligible (see the comments related to the indicator that addresses "forest degradation").

#### **Risk mitigation measures: This is not the case**

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Indicator 55 - Conversion from natural forest to agriculture after December 31, 2020

RNP  
ROMSILVA  
(see annex  
3)

The conversion of forests to land for other purposes (agriculture) is a totally insignificant and irrelevant issue in Romania, as the Forest Code prohibits the reduction of the forest area, with a few exceptions but agriculture is not one of these exceptions. In concrete terms, at RNP-Romsilva level, in the 2021- 2024 period, no such conversion of forest areas into agricultural land took place, most of the situations in which "conversions" (definitive removals from the national forest fund) were recorded being represented by the realization/construction of infrastructure projects, often declared of national interest and public utility (e.g. In some cases, depending on the purpose of the investment, the land permanently removed from the forest has been compensated by land for other purposes, which has subsequently been afforested, without reducing the area of national forest. In any case, the cumulative area of such land permanently removed from the national forest fund is extremely small (about 80 ha in 2021, about 104 ha in 2022, about 90 ha in 2023 and about 52 ha in 2024) compared to the total area of the national forest fund (about. 6.7 million ha, of which approx. 3.1 million ha is state-owned public forest land), thus creating no impact on forests.

For these reasons, we consider that the risk for this indicator should be maintained at negligible, regardless of FSC policies and procedures on conversion, which require implicit designation of this indicator at non-negligible.

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Regarding the FSC Risk Assessment on wood supplying we don't have data and evidences on changing the land use category from forestry to agricultural use, on deforestation and conversion to agricultural use or breaking the law of regeneration of natural forests that can conduct to degradation.

National  
Forest Guard  
(see annex  
4)

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#### **General comments on stakeholders' feedback**

- ☐ The stakeholders' opinion is fully congruent to the argumentation that conversion of forest into agricultural land in Romania is not legally permitted and that there are no practices in this sense. The precautionary principle is not applicable in the absence of minimum evidences. Considering this indicator by default as non-negligible will have an impact on the credibility of the entire evaluation process.
- ☐ The team will include all the arguments in the revised version of CNRA and will not assign any risk and mitigation measures.



<b>Risk indicator</b>	<b>56. There is no conversion from natural forest to land uses other than agriculture since 31 December 2020.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	The Romanian Forest Code (L18/2008) prevents conversion from natural forest to land uses other than agriculture and the legislation is enforced.
<b>Risk mitigation</b>	-

### Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	19
No	2
Yes	22
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
Au loc transferuri de teren forestier pentru construirea de drumuri, cladiri etc. Translation: There are transfers of forest land for the construction of roads, buildings, etc.	Expert / Confidential	
No inputs		
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	21
No	1
Yes	21
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	13
No, mitigation measures for non-negligible indicators are not adequate	2
Yes, mitigation measures for non-negligible indicators are adequate	5
No input	23
<b>Total</b>	<b>43</b>

<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent</b>	<b>#</b>
Au fost suprafețe scoase definitiv din fondul forestier (prin defrișare) pentru căi de comunicații sau imobile rezidențiale.	Asociația ALIANȚĂ	1



Translation: There were areas permanently removed from the forest (by clearing) for roads or residential buildings.	PENTRU PĂDURE
No input	42
<b>Total general</b>	<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent #
Nu am comentarii relevante I don't have relevant comments.	1
No input	42
<b>Total general</b>	<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator and there are no additional comments meant to be considered in the evaluation

<b>Risk indicator</b>	<b>57. There is no degradation of natural forests since 31 December 2020.</b>
<b>Risk conclusion</b>	<b>Non-negligible risk</b>
<b>Source types</b>	all sources types
<b>Risk threshold</b>	57. 2. Any of the following are true: a) The degradation since 31 December 2020 in the area under assessment is more than 0.02% of the total natural forest area on average per year;
<b>Short description of risks</b>	The Romanian Forest Code (L18/2008) and subsequent legislation prevents degradation of natural forest and the legislation is in general enforced. However, considering the first results of the risk degradation map provided for the assessment of the indicator (FSC Forest Degradation Dashboard Beta), be using a precautionary principle the risk is considered non-negligible.
<b>Risk mitigation</b>	<ol style="list-style-type: none"> <li>Document Verification: Risk Maps <ul style="list-style-type: none"> <li>A risk analysis is to be performed in the administrative counties being assessed beyond the .02% threshold for degradation in the FSC Forest Degradation Dashboard. For those counties a supplementary analysis based on APV verification should conclude if the type of proposed silvicultural work can lead to forest degradation (e.g. reduce risks in the case of thinning and regeneration cuts, higher risks on large scale windstorms)</li> </ul> </li> </ol>

#### Feedback from public consultation

Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized	#
N/A	18
No	10
Yes	15
<b>Total</b>	<b>43</b>

What arguments / references / evidences can you provide for changing the risk conclusion?	Respondents #
<p>Analiza de degradare a FSC nu ofera suficiente date care sa sustina concluziile si nu poate fi efectuata o analiza obiectiva la acest nivel de granularitate.</p> <p>Translation: The FSC degradation analysis does not provide sufficient data to support the conclusions and an objective analysis cannot be performed at this level of granularity.</p>	Mihai Boghean
FSC Degradation Risk Dashboard is not a credible source. We need more details how the map was developed, based on which criteria.	Organization / confidential



<p>Opinia mea bazată atât pe experiența mea profesională cât și pe descrierea riscurilor din acest document este că acest risc ar trebui evaluat ca fiind neglijabil. Totuși, având în vedere că la descrierea riscului este menționată o hartă, FSC Forest Degradation Dashboard, care nu e publică, și în baza căreia riscul este considerat implicit ne-neglijabil, cu justificarea principiului precauției, nu permite desfășurarea corespunzătoare a acestui proces de consultare publică.</p>	Bogdan Banica
<p>Translation: My opinion based on both my professional experience and the description of the risk in this document is that this risk should be assessed as negligible. However, considering that a map is mentioned in the description of the risk, the FSC Forest Degradation Dashboard, which is not public, and based on which the risk is implicitly considered non-negligible, with the justification of the precautionary principle, does not allow the proper development of this consultation process public.</p>	
<p>Principiile care stau la baza gestionării durabile a pădurilor vizează promovarea tipului natural fundamental de pădure și asigurarea diversității biologice a pădurii, armonizarea relațiilor dintre silvicultură și alte domenii de activitate precum și prevenirea degradării ireversibile a pădurilor, ca urmare a acțiunilor umane și a factorilor de mediu destabilizatori. Lucrările de regenerare artificială și de completare a regenerărilor naturale se execută în termen de cel mult două sezoane de vegetație de la tăierea unică/definitivă/după tăieri de produse accidentale sau tăieri ilegale pe suprafețe compacte de peste 0,5 ha 97% din păduri - compoziție naturală. 86% obținute prin regenerare naturală (samanta și lastari).</p> <p>Translation: The principles underlying the sustainable management of forests aim at promoting the fundamental natural type of forest and ensuring the biological diversity of the forest, harmonizing relations between forestry and other fields of activity, as well as preventing the irreversible degradation of forests, as a result of human actions and environmental factors destabilizers.</p> <p>The works of artificial regeneration and completion of natural regenerations are carried out within no more than two vegetation seasons from the single/definitive cutting/after cutting of accidental products or illegal cutting on compact areas of more than 0.5 ha 97% of forests - natural composition. 86% obtained through natural regeneration (seeds and shoots).</p>	FSC Romania
<p>Relying on a demo tool as is mentioned the FSC Forest Degradation Dashboard provides, can not be in line with the precautionary principle. The FSC-PRO-60-006b V2-0 Risk Assessment Framework states that the precautionary approach applies in the absence of best available information (or the lack of any available information), while for applying this principle, it states is available for indicator no. 55 (see page 32).</p>	Antonela Costea
<p>Se face referire la o hartă de degradare furnizată pentru evaluarea indicatorului (FSC Forest Degradation Dashboard Beta), la care nu există acces (decât pentru organisme de certificare) în baza căreia riscul este considerat neneglijabil. Relativ recent (prin Scrisoarea de punere în întârziere emisă pentru România în ceea ce privește gestionarea pădurilor) a fost utilizată greșit o bază de date satelitară (Global Forest Watch) interpretându-se (eronat) că zonele în care s-a identificat o schimbare (ca urmare a perturbărilor naturale sau antropice – inclusiv exploatare legală) este invariabil „Pierdere de pădure” (adică conversie), cu toate că același produs prezintă o notă de clarificare în care menționează că nu face diferența între cauze naturale sau antropice și între pierdere temporară sau permanentă a coronamentului. De altfel, după ce arborii tineri ating o anumită înălțime (și devin detectabili de către sateliți) produsul identifică și suprafețele pe care pădurea a crescut din nou („Câștig de pădure”). În plus față de aceste detalii, România (în cazul Scrisorii de punere în întârziere) a venit cu dovezi clare (din teren și documentații aferente) că și în cazurile în care sateliți încă nu detectaseră pădurea tânără, aceasta era prezentă. Ca atare, am mari rezerve că baza de date utilizată (FSC Forest Degradation Dashboard Beta) este capabilă să determine obiectiv și la nivel național degradare a pădurilor naturale în ultimii 3-4 ani. Având în vedere faptul că legislație națională și instrumentele de monitorizare (Inventarul Forestier Național) dar și instrumentele existente la nivel global (Global Forest Watch și Forest Landscape Integrity index) dovedesc faptul că în România nu sunt degradate păduri naturale ci dimpotrivă, sunt menținute chiar în proporție mult mai ridicată decât în multe (dacă nu chiar majoritatea) alte state europene, pentru transparență și obiectivitate, consider că este obligatoriu ca FSC să acorde acces la baza de date înainte de a considera în baza acesteia (și în detrimentul dovezilor oferite de celelalte surse menționate aici) că riscul este ne-neglijabil pentru acest indicator.</p>	Tudor Stancioiu



Translation: Reference is made to a degradation map provided for the evaluation of the indicator (FSC Forest Degradation Dashboard Beta), to which there is no access (except for certification bodies) on the basis of which the risk is considered non-negligible. Relatively recently (through the Letter of Deferral issued for Romania regarding forest management) a satellite database (Global Forest Watch) was misused by (erroneously) interpreting that the areas where a change was identified (as a result of natural or anthropogenic disturbances – including legal logging) is invariably 'Forest loss' (ie conversion), although the same product has a clarification note stating that it does not differentiate between natural causes or anthropogenic and between temporary or permanent loss of the canopy. Moreover, after the young trees reach a certain height (and become detectable by satellites) the product also identifies the areas on which the forest has grown again ("Forest Gain"). In addition to these details, Romania (in the case of the Letter of Delay) came with clear evidence (from the field and related documentation) that even in cases where satellites had not yet detected the young forest, it was present. As such, I have great reservations that the database used (FSC Forest Degradation Dashboard Beta) is capable of objectively and nationally determining natural forest degradation over the past 3-4 years.

Considering the fact that national legislation and monitoring instruments (National Forest Inventory) but also existing instruments at the global level (Global Forest Watch and Forest Landscape Integrity index) prove that in Romania natural forests are not degraded but on the contrary, they are maintained even in much higher proportion than in many (if not most) other European states, for transparency and objectivity, I consider it mandatory that the FSC gives access to the database before considering based on it (and in to the detriment of the evidence provided by the other sources mentioned here) that the risk is non-negligible for this indicator.

Sistemul silvicultural românesc se bazează pe promovarea tipului fundamental de pădure, pe asigurarea unei diversități de specii autohtone adaptate condițiilor staționale, pe asigurarea unei stări de sănătate și vitalitate corespunzătoare a arboretelor, pe prevenirea degradării pădurilor ca urmare a acțiunilor destabilizatoare a unor factori biotici sau abiotici. Ținta acestor obiective este tocmai obținerea unor arborete cât mai apropiate de starea lor naturală, accentul fiind pus în special pe regenerarea naturală, cu specii autohtone, în detrimentul regenerării artificiale care ocupă o pondere redusă din totalul suprafețelor regenerate anual. Tratamentele silvice, lucrările de îngrijire (degajări, curățiri, rărituri), tăierile de conservare, de igienă sau extragerea masei lemnoase afectate de diversi dăunători (produse accidentale) aplicate de peste 100 de ani în România au exact rolul de a preveni degradarea pădurilor. Constituirea fondului de conservare și regenerare a pădurilor (inclusiv pentru proprietarii privați) este o obligație legală menită să asigure regenerarea suprafețelor parcurse cu tăieri sau pentru ajutorarea regenerărilor naturale deja instalate. Chiar și în cazul în care proprietarii nu realizează lucrările de regenerare a pădurii din motive imputabile lor, există prevederi legale ca aceste lucrări să fie executate forțat, putându-se ajunge chiar la executarea silită din acest motiv. Nu avem cunoștință despre niciun fenomen de degradare a pădurilor primare în ultimii ani în România, ba mai mult, odată cu apariția Catalogului Național al Pădurilor Virgine și Cvasivirgine toate arboretele care îndeplineau condițiile/criteriile specificate în legislație, au fost introduse în zona de non-intervenție (protecție strictă), fiind interzisă prin lege exploatarea masei lemnoase în astfel de suprafețe. Ca urmare, considerăm că și acest indicator trebuie menținut la nivelul de risc neglijabil. Nu înțelegem și nu avem cunoștință despre metodologia și informațiile care au fost utilizate la elaborarea de către FSC a instrumentului numit FSC Forest Degradation Dashboard (conform căruia multe regiuni din România depășesc pragul de degradare de 0,02%), însă considerăm că trebuie analizat cu mare atenție acest instrument, întrucât există temeri justificate referitoare la includerea unor suprafețe supuse tratamentelor silvice aflate în desfășurare (tăieri de produse principale), lucrărilor de îngrijire (produse secundare), lucrărilor de conservare, tăierilor de igienă sau de extragere a produselor accidentale etc în categoria pădurilor degradate, lucru care îl considerăm total inacceptabil. Foarte probabil trebuie revizuit acest instrument elaborat de FSC ci nu nivelul de risc pentru acest indicator valabil pentru România (în sensul modificării lui de la nivelul neglijabil la neneglijabil).

Translation: The Romanian silvicultural system is based on the promotion of the fundamental type of forest, on ensuring a diversity of autochthonous species adapted to seasonal conditions, on ensuring an appropriate state of health and vitality of the stands,

Laurentiu  
Mihaila RNP-  
Romsilva



on preventing the degradation of forests as a result of the destabilizing actions of some biotic or abiotic factors. The goal of these objectives is precisely to obtain stands as close as possible to their natural state, the emphasis being placed especially on natural regeneration, with native species, to the detriment of artificial regeneration, which occupies a small share of the total areas regenerated annually. Forestry treatments, care works (clearing, cleaning, thinning), conservation, hygiene cuts or the extraction of woody mass affected by various pests (accidental products) applied for over 100 years in Romania have exactly the role of preventing the degradation of forests. The constitution of the forest conservation and regeneration fund (including for private owners) is a legal obligation intended to ensure the regeneration of areas covered by cuttings or to help natural regenerations already installed. Even if the owners do not carry out the forest regeneration works for reasons imputable to them, there are legal provisions for these works to be carried out forcibly, it is even possible to reach forced execution for this reason.

We are not aware of any phenomenon of degradation of primary forests in recent years in Romania, moreover, with the appearance of the National Catalog of Virgin and Quasi-Virgin Forests, all stands that met the conditions/criteria specified in the legislation, were included in the non-intervention (strict protection), the exploitation of wood in such areas being prohibited by law.

As a result, we believe that this indicator should also be kept at the level of negligible risk. We do not understand and have no knowledge of the methodology and information that was used when FSC developed the tool called FSC Forest Degradation Dashboard (according to which many regions in Romania exceed the degradation threshold of 0.02%), but we believe that it should be analyzed with great attention to this instrument, as there are justified concerns regarding the inclusion of areas subject to ongoing silvicultural treatments (main product cuttings), maintenance works (secondary products), conservation works, cuttings of hygiene or extraction of accidental products, etc. in the category of degraded forests, which we consider totally unacceptable. It is very likely that this tool developed by the FSC needs to be revised, but not the risk level for this indicator valid for Romania (in the sense of its change from negligible to non-negligible).

Suprafetele cu vegetatie forestiera din AFF nu se incadreaza in definitia "Paduri primare", fiind utilizate in difeite scopuri cum ar fi lemnul de foc, adapost pentru animale domestice, etc., cu indicii clare ale activitatii umane In cazul FF national e in vigoare OM 3397/2012 si OM 2525/2016 Art. 1. (1) Se aprobă constituirea Catalogului național al pădurilor virgine și cvasivirgine din România, denumit în continuare Catalog, ca instrument de evidență și gestiune a pădurilor virgine și cvasivirgine, așa cum sunt definite în anexa la Ordinul ministrului mediului și pădurilor nr. 3.397/2012 privind stabilirea criteriilor și indicatorilor de identificare a pădurilor virgine și cvasivirgine în România, cu modificările ulterioare. (2) Constituirea și actualizarea permanentă a Catalogului se fac de către autoritatea publică centrală care răspunde de silvicultură. OM 3397/2012 Art. 3. (1) Măsurile de gospodărire pentru arboretele încadrate prin amenajamentele silvice, până la data intrării în vigoare a prezentului ordin, la categoria funcțională "1.5j - păduri seculare, virgine și cvasivirgine, de valoare deosebită" sunt cele corespunzătoare tipului funcțional I. (tipul I (TI): păduri cu funcții speciale de protecție în care este interzisă, prin reglementări, exploatarea de masă lemnoasă sau de alte produse, fără aprobări emise în baza actelor administrative privind protecția mediului și/sau acordul administratorului ariei naturale protejate;).

Translation: The areas with forest vegetation in the AFF do not fall under the definition of "Primary Forests", being used for different purposes such as firewood, shelter for domestic animals, etc., with clear indications of human activity In the case of the national FF, OM 3397/2012 and OM 2525/2016 are in force Art. 1. (1) The establishment of the National Catalog of virgin and quasi-virgin forests in Romania, hereinafter referred to as the Catalog, is approved as a tool for recording and managing virgin and quasi-virgin forests, as defined in the annex to the Order of the Minister of Environment and Forests no. 3,397/2012 regarding the establishment of criteria and indicators for the identification of virgin and quasi-virgin forests in Romania, with subsequent amendments.

(2) The creation and permanent updating of the Catalog is done by the central public authority responsible for forestry.

OM 3397/2012 Art. 3. (1) The management measures for the groves included in the forestry arrangements, until the date of entry into force of this order, in the functional category "1.5j - secular, virgin and quasi-virgin forests, of special value" are those corresponding to the functional type I. (type I (TI): forests with special protection functions in which the exploitation of wood or other products is prohibited, by regulations, without

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approvals issued based on the documents administrative measures regarding environmental protection and/or the agreement of the administrator of the protected natural area;)	
<p>Teoretic, avand in vedere dispozitiile legii (L46/2008), nu exista terenuri din fondul forestier care sa nu fie sub supravegherea unui ocol silvic care asigura servicii silvice (a se vedea disp. art.16 Cod silvic, respectiv dispozitiile Ordinului nr. 530/2019) Ca urmare, daca se discuta de lucrarile de regenerarea padurii, aceasta se realizeaza in conditiile legii si, daca este cazul, cu aplicarea dispozitiilor normelor silvice aprobate prin Ordinul nr. 2533/2022, obligatiile si raspunderea fiind ale personalului silvic. Neindeplinirea acestor obligatii atrage, dupa sine, raspunderea personalului silvic. Exista o statistica a acestor sanctiuni aplicate personalului silvic?</p> <p>Translation: Theoretically, taking into account the provisions of the law (L46/2008), there are no lands from the forest fund that are not under the supervision of a forester who provides forestry services (see provision of art. 16 of the Forestry Code, respectively the provisions of Order no. 530 /2019)</p> <p>As a result, if forest regeneration works are discussed, this is carried out under the conditions of the law and, if necessary, with the application of the provisions of the forestry norms approved by Order no. 2533/2022, the obligations and responsibility being of the forestry personnel. Failure to fulfill these obligations entails the responsibility of the forestry personnel. Are there statistics of these sanctions applied to forestry personnel?</p>	Viorel Marinescu
<b>Total</b>	<b>43</b>
<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	20
No	9
Yes	14
<b>Total</b>	<b>43</b>
<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>
Asa cum am aratat mai sus, o sursa oficiala din care sa rezulte ca personalul silvic nu si-a indeplinit in mod corespunzator obligatiile privind asigurarea "calitatii padurilor" ar fi de dorit.	Viorel Marinescu
<p>Translation: As I have shown above, an official source from which it can be concluded that the forestry personnel did not properly fulfill their obligations regarding the assurance of the "quality of the forests" would be desirable.</p> <p>Baze de date la nivel național (amenajamente sive, IFN, hărți GIS deținute de institute sau universități). Cu ajutorul acestora s-ar putea valida sau invalida produsul utilizat în analiză (FSC Forest Degradation Dashboard Beta).</p> <p>Databases at national level (forest management plans, IFN, GIS maps owned by institutes or universities). With their help, the product used in the analysis could be validated or invalidated (FSC Forest Degradation Dashboard Beta).</p>	Tudor Stancioiu
Consider the fact that EUDR is under delay. Other sources should be considered. Negligible risk shall be designated.	Antonela Costea
Este necesara utilizarea mai multor resurse (ex. Global Forest Watch s.a. ) care sa descrie mai bine realitatea in ceea ce priveste degradarea padurilor din Romania.	Mihai Boghean
It is necessary to use more resources (e.g. Global Forest Watch s.a.) to better describe the reality regarding the degradation of forests in Romania.	
FSC Forest Degradation Dashboard - nu face diferenta intre degradare si aplicarea tratamentelor cu regenerare sub masiv. aplicate in peste 90% din cazuri. Induce grav in eroare opinia publica prin desemnare ca degradari exact a acelor suprafete in care se promoveaza prin interventii silvice regenerarea naturala si biodiversitatea. Catalogul nationala al padurilor virgine si quasivirgine conform OM 2525/2016 are un caracter tehnic silvic si concretizat in suprafete bine definite si incadrate , cu un statut	Organization/ confidential



de conservare totala. Pana la data actuala nu exista dovezi de degradare a padurilor incluse in acest catalog.

Translation: FSC Forest Degradation Dashboard - does not differentiate between degradation and the application of regeneration treatments under the massif. applied in over 90% of cases. It seriously misleads the public opinion by designating as degradation exactly those surfaces where natural regeneration and biodiversity are promoted through forestry interventions. The national catalog of virgin and quasi-virgin forests according to OM 2525/2016 has a technical forestry character and is embodied in well-defined and framed areas, with a total conservation status. To date, there is no evidence of degradation of the forests included in this catalog.

I suggest use Forest Landscape Integrity Index Map  
<https://www.forestintegrity.com/>

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Procesul de consultare ar trebui reluat după ce harta FSC Forest Degradation Dashboard este disponibilă public.

Bogdan Banica

Translation: The consultation process should resume after the FSC Forest Degradation Dashboard map is publicly available.

Since the source types are classified as "protected forest with management plan" and "protected forest without management plan" or "FSC certified forest" I can not understand why the risk evaluation is done for "all source types". I would assume there is less risk in FSC-certified forest and in a forest with management plan.

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Since the source types are classified as "protected forest with management plan" and "protected forest without management plan" or "FSC certified forest" I cannot understand why the risk evaluation is done for "all source types". I would assume there is less risk in an FSC-certified forest and in a forest with a management plan.

No input

**Total**

**43**

**For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?**

**#**

No need for mitigation measures, as I consider the risk as being negligible

8

No, mitigation measures for non-negligible indicators are not adequate

5

Yes, mitigation measures for non-negligible indicators are adequate

8

No input

22

**Total**

**43**

**What measures can you suggest to be applicable for mitigating the risk for this indicator?**

**Respondent**

**#**

Analiza amenajamentelor silvice, in care se face analiza modului de aplicare a amenajamentului anterior.

Viorel  
 Marinescu

Translation: The analysis of forest management planning, in which the way of application of the proposed works is analyzed

1

Aș sugera să ca acțiunile să nu se refere doar la partea de planificare a lucrărilor, ci și la cea de execuție. În ultimii 30 de ani diferențele dintre prevederile amenajamentelor și aplicarea acestora sunt semnificative, mai ales în ceea ce privește lucrările de îngrijire și conducere, dar și regenerările artificiale (compoziții de împădurire necorespunzătoare)

Expert/confident  
 ial

Translation: I would suggest that the actions should not only refer to the planning part of the works, but also to the execution part. In the last 30 years, the differences between the provisions of the arrangements and their application are significant, especially in terms of care and management works, but also artificial regenerations (improper afforestation compositions)

1

EC has the EU observatory on deforestation and forest degradation and the Global Forest maps for year 2020 in support to EUDR, under development.

Antonela  
 Costea

<https://forest-observatory.ec.europa.eu/forest>

<https://forest-observatory.ec.europa.eu/forest/rmap>

1

Măsurile de atenuare trebuie să ia în considerare cel puțin 3 aspecte importante care contribuie la degradarea pădurilor:  
 - lipsa de capitalizare a sectorului de exploatare forestieră, care conduce la utilizarea de utilaje și echipamente uzate fizic și moral, având un impact negativ asupra aplicării tratamentelor silviculturale

Grupul pentru  
 Dialog Forestier

1



- dispariția accelerată a unor competențe necesare pentru tehnologii prietenoase cu mediul (în special cele care folosesc energia gravitațională)
- deplasarea populației către mediul urban, ceea ce face tot mai dificilă găsirea forței de muncă necesară pentru lucrări silvice precum ajutorarea regenerării naturale, descopleșiri, degajări sau curățiri

Translation: Mitigation measures must consider at least 3 important aspects that contribute to forest degradation

- the lack of capitalization of the forestry sector, which leads to the use of physically and morally worn machinery and equipment, having a negative impact on the application of silvicultural treatments
- the accelerated disappearance of skills necessary for environmentally friendly technologies (especially those that use gravity energy)
- the movement of the population to the urban environment, which makes it more and more difficult to find the necessary workforce for forestry works such as helping natural regeneration, clearing, clearing or cleaning

No input

39

**Total general**

**43**

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
<p>„Pentru proprietarii care nu execută lucrările de regenerare a pădurilor din motive imputabile, obligația de regenerare se transmite structurii teritoriale de specialitate a autorității publice centrale care răspunde de silvicultură (adică Garda Forestieră), costul acestor lucrări fiind suportat de proprietar. După caz, creanța de la proprietar se recuperează prin executare silită” - Dificil de aplicat în practică, traseul fiind foarte sinuos. Corectă ar fi legiferarea procedurii prin care proprietarul ar fi expropriat integral de suprafața respectivă (lucru care este greu de implementat deoarece este o măsură nepopulară), pentru nerespectarea executării lucrărilor de regenerare, proprietatea fiind preluată de statul român, prin RNP Romsilva-R.A. Sunt sigur că proprietarii ar accepta fără crâcnire.</p> <p>Translation: "For owners who do not carry out the forest regeneration works for imputable reasons, the regeneration obligation is transmitted to the specialized territorial structure of the central public authority responsible for forestry (i.e. the Forest Guard), the cost of these works being borne by the owner. As the case may be, the claim from the owner is recovered through forced execution" - Difficult to apply in practice, the route being very winding. It would be correct to legislate the procedure by which the owner would be fully expropriated from the respective surface (something that is difficult to implement because it is an unpopular measure), for non-compliance with the execution of regeneration works, the property being taken over by the Romanian state, through RNP Romsilva-R.A. I'm sure the owners would accept without hesitation.</p>	Expert/ confidenti al	1
<p>1. Cred ca este necesar ca la pct. "legislatie" sa fie incluse, cel putin, cele doua acte normative mai sus citate .</p> <p>2. Cred ca la pct. "Descrierea cerintelor legale" trebuie sa fie inserate aspecte aratate mai sus la argumente.</p> <p>Translation:</p> <p>1. I think it is necessary that point "legislation" should include, at least, the two normative acts cited above</p> <p>2. I think that at point "Description of legal requirements" must be inserted aspects shown above in the arguments.</p>	Viorel Marinescu	1
<p>Consider că evaluarea unor riscuri implicit ne-neglijabile, împotriva evidențelor, va duce la slăbirea încrederii în sistemul de certificare FSC - suplimentează inutil birocrăția fără nici un efect benefic și transformă inutil în „suspect” orice operator din România.</p> <p>Translation: I believe that the evaluation of implicitly non-negligible risks, against the records, will lead to the weakening of the trust in the FSC certification system - it unnecessarily adds bureaucracy without any beneficial effect and unnecessarily turns any operator in Romania into a "suspect".</p>	Bogdan Banica	1
No input		40
<b>Total general</b>		<b>43</b>



Comments received by emails:	Respondent #
<p><b>57. There is no degradation of natural forests since 31 December 2020.</b></p> <p><i>Risc neglijabil</i></p> <p><b>Argumentare / Descrierea riscului :</b></p> <p><b>A.</b> Daca luam in considerare definitia EUDR pentru “degradarea padurilor” ca fiind reprezentata de “modificările structurale ale suprafețelor împădurite care constau în transformarea: (a) pădurilor primare sau a pădurilor regenerate în mod natural în plantații forestiere sau în alte terenuri împădurite; sau (b) pădurilor primare în păduri plantate”, sustinem ca in Romania incidenta unor astfel de situatii de “degradare a padurilor” este neglijabila (daca cumva exista). Justificam aceteste considerente prin urmatoarele:</p> <ul style="list-style-type: none"> <li>~ Regimul silvic instituit prin Codul Silvic si Normele Silvice (inca din 1984), obliga strict la pastrarea tipului natural de padure. Compozitiile de regenerare /compozitiile tel se stabilesc pe grupe ecologice in baza conditiilor stationale, si urmaresc mentinerea /refacerea compozitiilor naturale. Formulele de impadurire urmaresc strict refecerea /metinerea unor compozitii naturale.</li> <li>~ In practica silvica, situatiile prin care prin tratamentele de regenerare urmate de eventuale lucrari de impaduriri /ajutorarea regenerarii naturale sa ajunga sa fie schimbat tipul natural de padure, sunt absolut nesemnificative (daca exista eventual punctual astfel de situatii).</li> <li>~ Pepinierele silvice din Romania sunt dimensionate sa produca puieti in mod planificat pentru a fi plantati conform formulelor si schemelor de impadurire prevazute in planurile de management (in principal prin lucrari de completare a regenerarilor naturale). Deficitul de puiet pentru impadurirea altor terenuri din afara fondului forestier national este clar evidentiata in documentele care fundamenteaza investitiile din PNRR in noi pepiniere silvice.</li> <li>~ Introducerea unor specii alohtone este permisa doar pentru “inobilarea compozitiilor” in situatii in care este justifica de ratiuni privind protectiei mediului sau socio-economice (ex. introducerea in urma doboraturilor de vand in molidisuri a laricelui pe culmile vantuite pentru cresterea rezistentei arboretelor in fata factorilor abiotici daunatori) dar fara sa schimbe tipul de padure la nivelul intregului arboret.</li> <li>~ Prin regimul silvic se urmareste conducerea arboretelor catre compozitii conform tipului natural de padure. Chiar si in urma actiunii factorilor externi daunatori (biotici sau abiotici) prin regimul silvic se urmareste refacerea tipului natural de padure iar acesta reprezinta bazele amenajarii care se aplica in practica.</li> </ul> <p><b>B.</b> Dacă luăm în considerare definitia “degradarii padurilor” conform FSC-POL-01-007 V1-0 EN ca fiind “schimbarea pădurilor naturale* sau ale zonelor cu Valoare Ridicata de Conservare* care afectează <b>semnificativ și negativ</b> compoziția, structura și/sau funcția acesteia și <b>reduc capacitatea</b> ecosistemului de a furniza produse, de a susține biodiversitatea și/sau de a oferi servicii ecosistemice”, consideram ca in Romania incidenta acestor situatii incepand cu ianuarie 2021, este neglijabila sub raportul suprafetei.</p> <ul style="list-style-type: none"> <li>~ Totalul lucrarilor de regenerare acopera anual cca 25.000 ha din totalul de 7 mil. ha (ceea ce reprezinta o suprafata de 0,35%), insa prin aplicarea tratamentelor silviculturale (cu regenerare naturala cca 65% sau artificiala prin plantari 35%) nu este afectat caracterul “pădurilor naturale” (vezi definitia “paduri naturale” conform FSC-POL-01-007 V1-0 EN). In general silvicultura aplicata in Romania este una apropiata de natura (<a href="https://www.wwf.ro/paduri/padurile-multiseculare-old-growth-forests/">https://www.wwf.ro/paduri/padurile-multiseculare-old-growth-forests/</a>), un fapt asumat si de Comisia Europeana in Raportul de tara pentru 2024 (“Romania’s forestry system is generally subject to long-term planning to protect biodiversity in a sustainable way” <a href="https://economy-">https://economy-</a></li> </ul>	<p>WWF Romania</p>



- ~ Procedura de infringement declansata impotriva Romaniei in data de 12 februarie 2020 ce face obiectul Cauzei nr. 2020 /2033, evidentiaza ca posibile habitate forestiere degradate suprafata de 20.955 ha din care s-au confirmat in urma evaluarilor pe teren o suprafata de 5.125 ha degradata care necesita lucrari de reconstructie ecologica a habitatelor forestiere (OM 1063 /14.05.2024). Aceste cifre indica un procent de maxim 0,013% din totalul fondului forestier la nivelul intregii relete de arii protejate Natura 2000 (N.B. sub pragul de 0,02%).
- ~ De asemenea trebuie tinut cont ca formele de degradare a habitatelor forestiere au survenit anterior anului 2021 in principal (i) in situatia padurilor retrocedate pentru care nu au fost asigurate servicii silvice - ca efect al taierilor necontrolate ce a urmat procesului de retrocedare haotica desfasurat ca urmare a aplicarii Legii 18 /1991, Legea 10 /2000 respectiv Legea 247 /2005; sau (ii) in situatia Valorilor Ridicate de Conservare pentru care normele silvice de amenajare nu prevedeau in mod explicit incadrarea in categorii functionale adecvate care sa permita ocrotirea valorilor in cauza (NT5 /2000).
- ~ Dupa 2021 valul efectelor retrocedarilor s-a stins, in prezent exista ocoale nominalizate care sa asigure serviciile silvice minimale pentru intreg fondul forestier national, care urmaresc inclusiv integritatea fondului forestier national. De asemenea incepand cu anul 2018 prin OM 766 si mai recent prin OM /2022, sistemul de cartare functionala a padurilor este dezvoltat astfel incat acesta reflecta toate categoriile de Valori Ridicate de Conservare. In prezent nu exista conflicte intre normele silvice si cerintele FSC care definesc un management forestier responsabil si ocrotirea Valorilor Ridicate de Conservare.
- ~ Apreciem initiativa FSC de a dezvolta instrumente inovative pentru identificarea zonelor de risc privind incidenta situatiilor de degradare a padurilor (FSC Forest Degradation Dashboard Beta). Pentru a realiza o analiza solida si pentru a putea formula un raspuns temeinic argumentat, in procesul de consultare, WWF a solicitat sa fie puse la dispozitie metodologia de lucru si rezultatele detaliate in format GIS. Avand in vedere ca pana in prezent nu am avut acces la aceste date, nu putem oferi decat o apreciere punctuala a unor zone unde am reusit sa identificam terenuri considerate ca fiind "degradation". Asadar in urma evaluarilor punctuale in zone pilot, in niciunul dintre aceste puncte nu se justifica incadrarea in zone de risc in raport cu „degradarea padurilor”. De asemenea, pentru a oferi o perspectiva obiectiva asupra starii padurilor la nivel regional, consideram util sa fie prezentat, in cadrul platformei informative, si stratul thematic ce reprezinta padurile considerate ca fiind „paduri degradate” la data de referinta 31 decembrie 2020. Daca metodologia prezinta o acuratete adecvata, aceasta harta ar putea fi utilizata si in devoltarea planurilor nationale pentru aplicarea NRL.

In concluzie consideram ca pentru padurile din Romania pentru care se instituie regimul silvic se aplica o silvicultura apropiata de natura, si prin urmare consideram ca riscul de degradare a padurilor este neglijabil (degradarea padurii nu este larg raspandita sau sistematica si se situeaza sub pragul de 0,02%).

Translation:

Negligible risk

Argumentation / Description of the risk:

A. If we take into account the EUDR definition for "forest degradation" as being represented by "structural changes in forested areas that consist in the transformation of: (a) primary forests or naturally regenerated forests into forest plantations or other wooded lands; or (b) primary forests in planted forests", we claim that in Romania the incidence of such situations



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of "forest degradation" is negligible (if it exists at all). We justify these considerations through the following:

- The forestry regime established by the Forestry Code and Forestry Norms (since 1984) strictly obliges to preserve the natural type of forest. Regeneration compositions / tel compositions are established by ecological groups based on seasonal conditions, and aim to maintain / restore natural compositions. The afforestation formulas strictly follow the restoration/maintenance of natural compositions.
- In forestry practice, the situations in which the natural type of forest is changed through the regeneration treatments followed by possible afforestation works/helping natural regeneration, are absolutely insignificant (if there are such situations).
- Forest nurseries in Romania are sized to produce saplings in a planned way to be planted according to the formulas and afforestation schemes provided in the management plans (mainly through works to complement natural regenerations). The lack of saplings for the afforestation of other lands outside the national forest fund is clearly highlighted in the documents that substantiate the PNRR investments in new forestry nurseries.
- The introduction of some non-native species is allowed only for the "ennobling of the compositions" in situations where it is justified by environmental protection or socio-economic reasons (e.g. the introduction of larch on windy ridges after felling for sale in spruce trees to increase the resistance of the stands to harmful abiotic factors) but without changing the type of forest at the level of the entire stand.
- Through the forestry regime, the direction of the stands towards compositions according to the natural type of forest is followed. Even after the action of harmful external factors (biotic or abiotic), through the forestry regime, the restoration of the natural type of forest is pursued, and this represents the basis of the arrangement that is applied in practice.

B. If we consider the definition of "forest degradation" according to FSC-POL-01-007 V1-0 EN as "the change of natural forests\* or areas of High Conservation Value\* that significantly and negatively affects the composition, structure and/or its function and reduce the capacity of the ecosystem to provide products, to support biodiversity and/or to offer ecosystem services", we consider that in Romania the incidence of these situations, starting from January 2021, is negligible under the surface ratio.

- The total regeneration works annually cover approx. 25,000 ha out of a total of 7 million. ha (which represents an area of 0.35%), but by applying silvicultural treatments (with natural regeneration approx. 65% or artificial regeneration through planting 35%) the character of "natural forests" is not affected (see the definition of "natural forests" according to FSC -POL-01-007 V1-0 EN). In general, forestry applied in Romania is close to nature (<https://wwf.ro/paduri/padurile-multiseculare-old-growth-forests/>), a fact also assumed by the European Commission in the Country Report for 2024 ("Romania's forestry system is generally subject to long-term planning to protect biodiversity in a sustainable way" [https://economy-finance.ec.europa.eu/document/download/dcac26a0-120e-4233-88b6-8c7b0d919257\\_en?filename=SWD\\_2024\\_623\\_1\\_EN\\_Romania.pdf](https://economy-finance.ec.europa.eu/document/download/dcac26a0-120e-4233-88b6-8c7b0d919257_en?filename=SWD_2024_623_1_EN_Romania.pdf) )
- The infringement procedure initiated against Romania on February 12, 2020, which is the subject of Case no. 2020 /2033, highlights as possible degraded forest habitats an area of 20,955 ha, of which a degraded area of 5,125 ha was confirmed following on-the-ground evaluations that requires ecological reconstruction works of forest habitats (OM 1063 /14.05.2024). These figures indicate a maximum percentage of 0.013% of the total forest fund at the level of the entire network of Natura 2000 protected areas (N.B. below the threshold of 0.02%).
- It should also be taken into account that the forms of degradation of forest habitats occurred before 2021 mainly (i) in the case of retroceded forests for which forestry services were not provided - as an effect of the uncontrolled cutting that followed



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the chaotic retroceding process carried out as following the application of Law 18/1991, Law 10/2000 and Law 247/2005 respectively; or (ii) in the case of High Conservation Values for which the forest management rules did not explicitly provide for the classification in appropriate functional categories that would allow the protection of the values in question (NT5 /2000).

- After 2021, the wave of retroceding effects has died down, currently there are nominated bypasses that ensure the minimum forestry services for the entire national forest fund, which also follow the integrity of the national forest fund. Also, starting with the year 2018 through OM 766 and more recently through OM /2022, the system of functional mapping of forests is developed so that it reflects all categories of High Conservation Values. Currently, there are no conflicts between forestry rules and FSC requirements that define responsible forest management and the protection of High Conservation Values.
- We appreciate the FSC initiative to develop innovative tools for identifying risk areas regarding the incidence of forest degradation situations (FSC Forest Degradation Dashboard Beta). In order to carry out a solid analysis and to be able to formulate a well-reasoned response, in the consultation process, WWF requested that the working methodology and detailed results be made available in GIS format. Considering that until now we have not had access to these data, we can only offer a specific assessment of some areas where we have managed to identify land considered as "degradation". Therefore, following point-by-point evaluations in pilot areas, in none of these points is it justified to be included in risk areas in relation to "degradation of forests". Also, in order to provide an objective perspective on the state of forests at the regional level, we consider it useful to present, within the informative platform, the thematic layer that represents the forests considered as "degraded forests" on the reference date of December 31, 2020. If the methodology shows adequate accuracy, this map could also be used in the development of national plans for the application of NRL.

In conclusion, we consider that for the forests in Romania for which the forestry regime is established, a silviculture close to nature is applied, and therefore we consider that the risk of forest degradation is negligible (forest degradation is not widespread or systematic and is below the threshold of 0.02%).

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#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is fully congruent to the argumentation that degradation of forest in Romania is not legally permitted and that there are no practices in this sense. The provided tool (FSC degradation map) raises questions about the used methodology being under development. The existing data at the national level do not point to systematic forest degradation below the threshold of 0.02%.
- ☐ The team will include all the provided arguments in the revised version of CNRA and will revise the risk assessment accordingly.



Indicator category: High Conservation Values

<b>Risk indicator</b>	<b>58. Concentrations of biological diversity including endemic species, and rare, threatened, or endangered species that are significant at global, regional or national levels are identified and protected, maintained or enhanced (HCV1).</b>
<b>Risk conclusion</b>	<b>Non-negligible risk</b>
<b>Source types</b>	Non-FSC certified forest areas in nature protected areas without management plans
<b>Risk threshold</b>	58. 1. HCV 1 is identified, or its occurrence is likely in the area under assessment and is threatened by management activities.
<b>Short description of risks</b>	HCV 1 is identified, or its occurrence is likely in the area under assessment and is threatened by management activities in non-certified forests located in Natura 2000 areas without a management plan
<b>Risk mitigation</b>	<ol style="list-style-type: none"> <li>1. Buy certified: sourcing from FSC certified forest mitigates the risk that HCVF1 are threatened by management activities</li> <li>2. Database verification: <ul style="list-style-type: none"> <li>- for non-FSC sources verification of the origin of APV in relation to the Natura 2000 protected areas is possible by activating the layer Nature protected areas in SUMAL 2.0 - Inspectorul Pădurii (<a href="https://inspectorulpadurii.ro/#/">https://inspectorulpadurii.ro/#/</a>)</li> <li>- the status of the management plans of Nature protected areas can be verified using the database of the governmental agency: <a href="https://ananp.gov.ro/pm-aprobrate-tabel-sinoptic/">https://ananp.gov.ro/pm-aprobrate-tabel-sinoptic/</a>. The sources from nature protected areas with a management plan are considered negligible risk if there are no evidences that the plan is not implemented properly.</li> </ul> </li> <li>3. Document verification: Conservation measures records <ul style="list-style-type: none"> <li>- for products sourced in non-FSC forest located in nature protected areas without a management plan, evidences of the implementation of general conservation measures need to be provided.</li> </ul> </li> </ol>

Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	20
No	3
Yes	20
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>
<p>Planurile de management ale AP N 2000 nu ofera date spatiale referitoare la VRC</p> <p>1. Simplul fapt ca un APV este constituit in raza unui sit N 2000 nu poate face dovada incalcarii acestui indicator . Atat timp cat punerea in valoare si exploatarea se face doar cu impunerea de conditii de catre administratorul AP , in afara padurilor certificate trebuie sa primeze Normele tehnice de amenajare a padurilor si principiile fundamentale pe care acestea sunt bazate, precum si zonarea functionala a padurilor care determina restrictii in concordanta cu aceasta. Amenajamentele silvice trec prin procesul de avizare de mediu inainte de a fi aprobate de catre Autoritatea competenta. Aceasta etapa fiind premergatoare recoltarii de produse forestiere trebuie considerat ca masurile de protectie au fost deja analizate si incorporate in amenajamentele silvice. Odata aprobate amenajamentele silvice , nu trebuie impuse masuri suplimentare decat la schimbarea conditiilor care fost luate in considerare la avizarea acestora.</p>	Organization



Translation: The management plans of AP N 2000 do not provide spatial data regarding VRC 1. The simple fact that an APV is established within the radius of a site N 2000 cannot prove the violation of this indicator.

As long as the development and exploitation is done only with the imposition of conditions by the administrator of the AP, in addition to the certified forests, they must receive the Technical Norms for forest management and the fundamental principles on which they are based, as well as the functional zoning of the forests that determine restrictions in accordance with this.

The forestry facilities go through the environmental approval process before being approved by the competent Authority. This stage being the precursor to the harvesting of forest products, it should be considered that the protection measures have already been analyzed and incorporated into the forest management. Once the forestry facilities are approved, no additional measures should be imposed except for the change of the conditions that were taken into account when approving them.

Romania scores very good in all evaluations made by global environmental organizations regarding biodiversity indexes and forest landscape integrity indexes.	Organization
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<b>Total</b>	<b>43</b>
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<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	22
No	2
Yes	19
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
<a href="https://www.forestintegrity.com/">https://www.forestintegrity.com/</a>	Organization	1
No input		
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	4
No, mitigation measures for non-negligible indicators are not adequate	1
Yes, mitigation measures for non-negligible indicators are adequate	13
No input	25
<b>Total</b>	<b>43</b>

<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent</b>	<b>#</b>
No input		
<b>Total general</b>		<b>43</b>

<b>Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).</b>	<b>Respondent</b>	<b>#</b>
No input		
<b>Total general</b>		<b>43</b>

<b>Comments received by emails:</b>	<b>Respondent</b>	<b>#</b>
<b>58. Concentrations of biological diversity including endemic species, and rare, threatened, or endangered species that are significant at global, regional or national levels are identified and protected, maintained or enhanced (HCV1).</b>	WWF Romania	



#### Argumentare / Descrierea riscului:

Exista probabilitatea ca VRC1 să fie expus la riscuri din cauza activităților de gestionare în pădurile necertificate aflate în zonele Natura 2000, care nu dispun de un plan de management sau în care planul de management al pădurii nu a respectat procedura de evaluare de mediu (vezi indicatorul 5 și măsurile de atenuare corespunzătoare).

Translation: Argumentation / Description of the risk:

VRC1 is likely to be at risk due to management activities in non-certified forests in Natura 2000 areas that do not have a management plan or where the forest management plan has not followed the environmental assessment procedure (see indicator 5 and the corresponding mitigation measures).

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator. The arguments provided by WWF will be included in the revised version of the CNRA.

<b>Risk indicator</b>	<b>59. Intact forest landscapes and large landscape-level ecosystems and ecosystem mosaics that are significant at global, regional, or national levels, and which contain viable populations of the great majority of the naturally-occurring species in natural patterns of distribution and abundance, are identified and protected, maintained or enhanced (HCV2).</b>
<b>Risk conclusion</b>	Negligible risks
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	HCVF2 was not identified as present in the national scale assessment based on the thresholds provided by the Forest Stewardship Standard for Romania <FSC-STD-ROU-01-2017>

#### Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	20
No	2
Yes	21
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
Întrucat nu există astfel de peisaje în România, indicatorul este neaplicabil nu neglijabil Translation: Since there are no such landscapes in Romania, the indicator is not applicable, not negligible	Tudor Stancioiu	1
No inputs		42
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	22
No	1
Yes	20



<b>Total</b>	<b>43</b>
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<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents #</b>
No input	43
<b>Total</b>	<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	11
No, mitigation measures for non-negligible indicators are not adequate	1
Yes, mitigation measures for non-negligible indicators are adequate	5
No input	26
<b>Total</b>	<b>43</b>

<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent #</b>
No input	43
<b>Total general</b>	<b>43</b>

<b>Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).</b>	<b>Respondent #</b>
Nu sunt necesare măsuri de atenuare, deoarece indicatorul este neaplicabil (nu neglijabil)	Tudor Stancioiu
No mitigation measures are required as the indicator is not applicable (not negligible)	1
No input	
<b>Total general</b>	<b>43</b>

#### General comments on stakeholders' feedback

- ☐ The only discussion here is if to consider this indicator as non-applicable (no HCVF2 identified in Romania) or as with negligible risks (since further identification of HCVF2 will be possible in the future)

<b>Risk indicator</b>	<b>60. Rare, threatened, or endangered ecosystems, habitats or refugia are identified and protected, maintained, or enhanced (HCV3).</b>
<b>Risk conclusion</b>	<b>Non-negligible risk</b>
<b>Source types</b>	Non-FSC certified forest areas in nature protected areas without management plans
<b>Risk threshold</b>	60. 1. HCV 3 is identified, or its occurrence is likely in the area under assessment and is threatened by management activities.
<b>Short description of risks</b>	HCV 3 is either present or likely to be present in the assessed area and is at risk due to management activities in non-certified FSC forests within Natura 2000 areas without management plans.
<b>Risk mitigation</b>	<ol style="list-style-type: none"> <li>1. Buy certified: sourcing from FSC certified forest mitigates the risk that HCVF1 are threatened by management activities</li> <li>2. Database verification: <ul style="list-style-type: none"> <li>- for non-FSC sources verification of the origin of APV in relation to the Natura 2000 protected areas is possible by activating the layer Nature protected areas in SUMAL 2.0 - Inspectorul Pădurii (<a href="https://inspectorulpadurii.ro/#/">https://inspectorulpadurii.ro/#/</a>)</li> <li>- the status of the management plans of Nature protected areas can be verified using the database of the governmental agency: <a href="https://ananp.gov.ro/pm-aprobate-tabel-sinoptic/">https://ananp.gov.ro/pm-aprobate-tabel-sinoptic/</a>. The sources from nature protected areas with a management plan are</li> </ul> </li> </ol>



	<p>considered negligible risk if there are no evidences that the plan is not implemented properly.</p> <p>3. Document verification: Conservation measures records</p> <ul style="list-style-type: none"> <li>- for products sourced in non-FSC forest located in nature protected areas without a management plan, evidences of the implementation of general conservation measures need to be provided.</li> </ul>
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## Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	19
No	3
Yes	21
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
Romania a identificat si evaluat peste 500.000 ha de paduri peste > 100 de ani ce potential pot indeplini criteriile din categoria VRC 3 incepand cu 2012. Padurile au fost identificate si incluse in Catalogul National al Padurilor Virgine si Cvasivirgine Translation: Romania has identified and evaluated over 500,000 ha of forests over > 100 years that can potentially fulfill the criteria of the VRC 3 category starting in 2012. The forests were identified and included in the National Catalog of Virgin and Quasi-Virgin Forests	Organization	1
Vezi indicator nr. 58 See indicator 58	Organization	1
No input		41
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	22
No	3
Yes	18
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	3
No, mitigation measures for non-negligible indicators are not adequate	2
Yes, mitigation measures for non-negligible indicators are adequate	15
No input	23
<b>Total</b>	<b>43</b>

<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent</b>	<b>#</b>
No input		43
<b>Total general</b>		<b>43</b>



Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
No input		43
<b>Total general</b>		<b>43</b>

Comments received by emails:	Respondent	#
<b>60. Rare, threatened, or endangered ecosystems, habitats or refugia are identified and protected, maintained, or enhanced (HCV3).</b>	WWF Romania	

Risc non-neglijabil

#### Argumentare / Descrierea riscului:

Prezența unui ecosistem inclus într-una dintre cele peste 40 de categorii și subcategorii de păduri și complexe, aflat într-o stare de conservare favorabilă, conduce la desemnarea VRC3, indiferent dacă acestea sunt sau nu incluse într-o arie protejată. Putem considera că, în ariile naturale protejate pentru care există planuri de management, aceste habitate sunt identificate și există măsuri de conservare transpuse prin amenajamentele silvice (dacă a fost urmată procedura de evaluare de mediu). În afara ariilor protejate și pentru suprafețele incluse în amenajamentele silvice pentru care nu se urmează procedura de evaluare a mediului, nu putem considera că există o procedură clară și sistematică de identificare a acestor ecosisteme. Astfel aplicarea măsurilor de conservare nu este întotdeauna o certitudine iar în consecință, pentru aceste suprafețe, riscul nu poate fi considerat neglijabil.

#### Translation: Argumentation / Description of the risk:

The presence of an ecosystem included in one of the more than 40 categories and subcategories of forests and complexes, in a favorable state of conservation, leads to the designation of VRC3, regardless of whether or not they are included in a protected area. We can consider that, in the protected natural areas for which there are management plans, these habitats are identified and there are conservation measures implemented through forestry (if the environmental assessment procedure was followed). Outside of the protected areas and for the areas included in the forestry facilities for which the environmental assessment procedure is not followed, we cannot consider that there is a clear and systematic procedure for identifying these ecosystems. Thus, the application of conservation measures is not always a certainty and consequently, for these surfaces, the risk cannot be considered negligible.

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator. The arguments provided by WWF will be included in the revised version of the CNRA.

<b>Risk indicator</b>	<b>61. Basic ecosystem services in critical situations, including the protection of water catchments and control of erosion of vulnerable soils and slopes, are identified and protected (HCV4).</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	HCV 4 is identified in correspondence with Forest Management Planning and is not threatened by management activities.



## Feedback from public consultation

Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized	#
N/A	21
No	
Yes	22
<b>Total</b>	<b>43</b>

What arguments / references / evidences can you provide for changing the risk conclusion?	Respondents	#
No inputs		43
<b>Total</b>		<b>43</b>

Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?	#
N/A	21
No	1
Yes	21
<b>Total</b>	<b>43</b>

What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?	Respondents	#
No input		43
<b>Total</b>		<b>43</b>

For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?	#
No need for mitigation measures, as I consider the risk as being negligible	12
No, mitigation measures for non-negligible indicators are not adequate	1
Yes, mitigation measures for non-negligible indicators are adequate	6
No input	24
<b>Total</b>	<b>43</b>

What measures can you suggest to be applicable for mitigating the risk for this indicator?	Respondent	#
No input		43
<b>Total general</b>		<b>43</b>

Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent	#
No input		43
<b>Total general</b>		<b>43</b>

## General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator. No actions needed.

<b>Risk indicator</b>	<b>62. Sites and resources fundamental for satisfying the basic needs of local communities or Indigenous Peoples are identified and protected (HCV5).</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	



<b>Short description of risks</b>	Resources fundamental for satisfying the basic needs of local communities are identified and provided
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**I** Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	20
No	1
Yes	22
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
No inputs		43
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	21
No	1
Yes	21
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	12
No, mitigation measures for non-negligible indicators are not adequate	1
Yes, mitigation measures for non-negligible indicators are adequate	5
No input	25
<b>Total</b>	<b>43</b>

<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent</b>	<b>#</b>
No input		43
<b>Total general</b>		<b>43</b>

<b>Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).</b>	<b>Respondent</b>	<b>#</b>
No input		43
<b>Total general</b>		<b>43</b>

<b>Comments received by emails:</b>	<b>Respondent</b>	<b>#</b>
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**62. Sites and resources fundamental for satisfying the basic needs of local communities or Indigenous Peoples are identified and protected (HCV5).**

WWF  
Romania

Risc non-neglijabil

Argumentare / Descrierea riscului:



Recunoaștem faptul că resursele pădurii, care satisfac necesitățile de bază ale comunităților locale, sunt deocamdată disponibile acestora. Însistăm însă asupra faptului că procesul se bazează mai mult pe eforturi voluntare rezultate din preocuparea personalului silvic din zonă și nu este încă o procedură legală care să susțină interesele legitime ale acestor comunități locale pe termen lung. De aceea, considerăm că, în sprijinul unei implementări clare, transparente și simplificate, cadrul legal trebuie să se dezvolte pentru a integra conceptul de „comunități dependente de pădure”, pentru a preveni limitarea accesului la resurse al acestora prin actualele proceduri administrative de valorificare a lemnului sau cesionarea dreptului de colectare a produselor accesorii ale pădurii.

#### Translation: Argumentation / Description of the risk:

We recognize that forest resources, which meet the basic needs of local communities, are currently available to them. We insist, however, that the process is based more on voluntary efforts resulting from the concern of forestry personnel in the area and is not yet a legal procedure to support the legitimate interests of these local communities in the long term. Therefore, we believe that, in support of a clear, transparent and simplified implementation, the legal framework must be developed to integrate the concept of "forest-dependent communities", to prevent the limitation of their access to resources through the current administrative procedures for the exploitation of wood or the assignment of the right to collect forest by-products.

#### General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator. Yet, WWF considers that the risk should be set as non-negligible but the proposed measures refers to the need to change the legal framework not to preventive measures possible to be implemented in the supply chain

<b>Risk indicator</b>	<b>63. Sites, resources, habitats, and landscapes of global or national cultural, archaeological, or historical significance, and/or of critical cultural, ecological, economic or religious/sacred importance for the traditional cultures of local communities or Indigenous Peoples are identified and protected (HCV6).</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	HCVF6 is identified and local communities can contribute in the stakeholder consultation processes in management planning activities

#### Feedback from public consultation

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	20
No	1
Yes	22
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
No inputs		43



<b>Total</b>	<b>43</b>
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<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	21
No	1
Yes	21
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	11
No, mitigation measures for non-negligible indicators are not adequate	1
Yes, mitigation measures for non-negligible indicators are adequate	6
No input	25
<b>Total</b>	<b>43</b>

<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent</b>	<b>#</b>
No input		43
<b>Total general</b>		<b>43</b>

<b>Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).</b>	<b>Respondent</b>	<b>#</b>
No input		43
<b>Total general</b>		<b>43</b>

General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator. No actions needed.



Indicator category: Genetically modified organisms

<b>Risk indicator</b>	<b>64. There is no commercial use of GMO.</b>
<b>Risk conclusion</b>	Negligible risk
<b>Source types</b>	all sources types
<b>Risk threshold</b>	
<b>Short description of risks</b>	There is no evidence of unauthorized use of genetically modified trees.

**Feedback from public consultation**

<b>Do you believe that the risk conclusion for this indicator (as negligible or non-negligible) is accurately categorized</b>	<b>#</b>
N/A	21
No	
Yes	22
<b>Total</b>	<b>43</b>

<b>What arguments / references / evidences can you provide for changing the risk conclusion?</b>	<b>Respondents</b>	<b>#</b>
No inputs		43
<b>Total</b>		<b>43</b>

<b>Do you consider that the sources types (risk is negligible / non-negligible for all sources types) for this indicator are correctly identified?</b>	<b>#</b>
N/A	22
No	
Yes	21
<b>Total</b>	<b>43</b>

<b>What source types can you suggest for assessing the risk for indicator and based on what arguments / evidences / references?</b>	<b>Respondents</b>	<b>#</b>
No input		43
<b>Total</b>		<b>43</b>

<b>For the non-negligible risks, the evaluation team has recommended mitigation measures. Do you consider these measures as being correctly identified?</b>	<b>#</b>
No need for mitigation measures, as I consider the risk as being negligible	13
No, mitigation measures for non-negligible indicators are not adequate	
Yes, mitigation measures for non-negligible indicators are adequate	4
No input	26
<b>Total</b>	<b>43</b>

<b>What measures can you suggest to be applicable for mitigating the risk for this indicator?</b>	<b>Respondent</b>	<b>#</b>
No input		43
<b>Total general</b>		<b>43</b>



Please add additional comments on the evaluation of this indicator (e.g. legislation used, references, description of risks, limitation of sources).	Respondent #
No input	43
<b>Total general</b>	<b>43</b>

General comments on stakeholders' feedback

- ☐ The stakeholders' opinion is generally in favor of the analysis for this indicator. No actions needed.



Do you have any additional general comments on the evaluation?	Respondent	#
Comentariile sunt de prisos. Translation: Comments are redundant.	Expert/ Confidential	1
Încercați să măsurați în grame cu cinci cifre după virgulă un proces social și biologic când în România nu avem clară nici acum situația proprietăților forestiere și proprietarii nici măcar nu sunt în măsură adecvată consultați sau consiliați. Translation: Try to measure in grams with five decimal places a social and biological process when in Romania we do not have a clear situation of forest properties even now and the owners are not even adequately consulted or advised	Doru Marinescu	1
Pt. rigoare, înainte de definitivare, cred ca trebuie realizata o verificare a tuturor citarilor de legislatie intrucat, asa cum am aratat, exista citari neadevarate Translation: For Strictly speaking, before the finalization, I think that a check should be made of all the citations of the legislation because, as I have shown, there are untrue citations	Viorel Marinescu	1
Riscul identificat la indicatorii 55 si 57 trebuie sa se incadreze in categoria "neglijabil". Altfel, credibilitatea intregului proces de evaluare a riscurilor va fi diminuata in randul utilizatorilor. Translation: The risk identified in indicators 55 and 57 must fall into the "negligible" category. Otherwise, the credibility of the entire risk assessment process will be diminished among users.	Mihai Boghean	1
Treabă bună! Bravo! Good job! Bravo!	Asociația ALIANȚĂ PENTRU PĂDURE	1
Utilizarea acestei RA nationale va ajuta operatorii in definirea propriilor DDS, functie de activitatea fiecaruia. Masurile de atenuare a riscurilor ar fi bine sa fie separate pentru activitatea de administratie silvica sau lant de custodie. Translation: The use of this national RA will help the operators in defining their own DDS, depending on the activity of each one. Risk mitigation measures should be separated for forestry administration activity or chain of custody.	Organization	1
<b>Total general</b>		



## ANNEXES

### Annex 1: List of notified stakeholders

Stakeholder group / Stakeholder name (in green proposed by national FSC representatives)

<b>1. Economic interests</b>
a) Forest owners and/or managers of large, medium and small forests; high-, medium-, and low-intensity managed forests;
RNP-Romsilva
AAP
ASOCIAȚIA PROPRIETARILOR ȘI ADMINISTRATORILOR DE PĂDURI DIN ESTUL TRANSILVANIEI
b) Tenure and use rights holders, including landowners;
Asociația de Proprietari Mârșani
Asociația Proprietarilor și Administratorilor de păduri din estul Transilvaniei, APAPET
Asociația Proprietarilor de Păduri, Pășuni și Terenuri Agricole din Ardeal Persoane fizice și juridice, filiala Maramureș
Asociația Proprietarilor de Păduri din România
Asociația Obștilor Vrâncene
Ingka Investments Romania
Tornator
GreenGold
Nostra Silva
Ingleby
Ocolul Silvic Abrud R.A.
Ocolul Silvic Valea Sebesului
Ocolul Silvic Sebes RA
Ocolul Silvic Sapcea Cugir RA
Ocolul Silvic Valea Pianului RA
Ocolul Silvic Horea-Apuseni RA
Ocolul silvic Codrii Zarandului
Ocolul Silvic Regal Savarsin
O.S. Papusa Rucar
O.S. Dragoslavele
O.S. Codrii Verzi
OS Lignum
OS Padurea Craiului
OS Poiana
OS Pietroasa
OS Lunca
OS Codrii Beiusului RA
OS Experimental Lechinita
OS comunal Romuli
OS Valea Sieului
Ocolul Silvic Padurile Sincii
Regia Publica locala a Padurilor Kronstadt RA
Ocolul Silvic al Orasului Rasnov RA
OS Baraolt
OS Renasterea Padurii



OS de Regim Gheorgheni
OS Municipal Baia Mare
OS Alpina Borsa RA
OS Muresul
OS Ghindari
OS Cerbu Carpatin
OS Vatava
OS M-rea Neamt
O.S. Asociatia Salcamul Ciumeşti
OS Dealul Sibiului RA
OS Jina
RPL OS Cindrel RA
OS Valea Sadului RA
OS al Orasului Talmaciu
OS Valea Frumoasei Saliste
SC OS Foria Forest SRL
OS Rasinari
OS Silva Bucovina
OS Bucovina
OS Dorna-Candreni
OS Bisericesc Ilisesti
OS Stejarul RA
OS Obarsia Lotrului-Voineasa
OS Lovistea
OS Saliste
OS Naruja
OS Tulnici
OS Privat Obstea Tulnici
OS Zabala Nereju
OS Ingka Investments
c) Forest contractors (including loggers);
ASFOR
ProLemn
Porini Log Oy
Silvania MIS Group
CERTIFICATE HOLDERS ACCORDING TO SHEET CHs-FSC (870 companies)
d) Representatives of forest workers and forest industries;
HS Timber Group
Kronospan
Egger
Kastamonu
Yildiz Entegre
APMR
Asociatia Industriei Lemnului - Prolemn
e) Certificate holders relevant for the organizations participating in the Risk Information Alliance.
Preferred by Nature



## 2. Social interests

a) NGOs involved or with an interest in social aspects of forest management and other related operations;

Fundația Adept

Asociația Alianța pentru Pădure

Asociația Adopta un Copac

Asociația EcoAssist

Fundația Pădurea de Mâine

Asociația Pădurea Copiilor

Act for Tomorrow

Asociația de Protecție a Omului și a Mediului pentru o Dezvoltare Durabilă în Lume

b) Forest workers;

Progresul Silvic

Confederația ConSilva

Furniture Producers Association

Proforest

c) International, national and local trade/labour unions;

Federația Sindicatelor SILVA

d) Representatives of local communities involved in or possessing an interest in forest management, including those relevant for HCVs 5 and 6;

ACoR

AOR

AMR

Asociația pentru dezvoltarea durabilă a comunităților locale "Romania Rurală"

Asociația Comunelor din România

e) Representatives of Indigenous Peoples and/or Traditional Peoples (if present and/or holding rights), including those relevant for HCVs 5 and 6;

f) Representatives of recreation interests;

Asociația Altitudine

Asociația HaicuBicla

Bike in time

Tasuleasa Social

g) Organizations working on gender issues.

USV/FEM4Forests

USV/FEM2Forests

## 3. Environmental interests

NGOs involved in or possessing an interest in the environmental aspects of forest management. Consultation should target the following areas of interest and expertise:

a) Biological diversity;

b) Water and soil;

c) High Conservation Values related to the environment;

d) Local communities, Indigenous Peoples, and Traditional Peoples' representatives.

WWF

Greenpeace

Federația Coaliția Natura 2000

Agent Green

ProPark

Kogayon

Conservation Carhathia



Fundația Pădurea de Mâine  
 Grupul pentru Dialog Forestier  
 Asociația pentru Conservarea Diversității Biologice  
 Pro Silva  
 Milvus  
 ViitorPlus- Asociația pentru Dezvoltare Durabilă  
 Plantam fapte Bune  
 Federația Proprietarilor de păduri și pasuni din România - Nostra Silva  
 Asociația pentru Conservarea Diversității Biologice  
 Asociația Green  
 Asociația pentru Promovarea și Dezvoltarea Turismului Gura Humorului  
 Asociația pentru Protecția Păsărilor și a Naturii (Grupul Milvus)

#### **4. FSC-accredited certification bodies active in the country;**

ACF

Soil Association

Bureau Veritas

Control Union

Det Norske Veritas Certification A

GFA Consulting Group

RINA ROMANIA

Scientific Certification Systems

SGS Romania

Tuv-Austria

#### **5. FSC Working Groups and/or Standard Development Groups;**

Stancioiu Tudor

Vlad Radu

Marinescu Viorel-Gheorghe

Mihaila Laurentiu

Moisa Constantin

Buzea Andreea Liana

Boroica Ioan

Mihai Dorina

Marius Turtica

#### **6. National and international FSC members;**

Mihai Boghean

Alexandra Popa

#### **7. Local development projects;**

#### **8. Government and enforcement agencies;**

Direcția Generală Păduri

ANANP

Sorin Banciu

GF Nationala

GF București

GF Brașov

GF Cluj

GF Focșani

GF Oradea

GF Ploiești



GF Vâlcea
GF Suceava
GF Timișoara
Ionel Andrei
<b>9. Experts, as specified in Clause 2.6 of the section ‘Process requirements for developing and revising risk assessments’;</b>
Daniel Nicolaescu
Ciprian Musca
Adrian Baban
Mihai Gasparel
Adrian Lucan
Fleseriu Ionel
Bogdan Calaras
Melu Radu
Emilian Monac
Bogdan Bănică
George Dinicu
Dan Achim
<b>10. Research institutions and universities;</b>
ASAS
Facultatea de Silvicultură și Exploatare Forestiere Brașov
Facultatea de Silvicultură Suceava
INCDS
Facultatea de Silvicultură și Cadastru USAMV CN
Facultatea de Protecția Mediului din Oradea
Facultatea de Ind. Lemnului
UNIVERSITATEA DE VEST “VASILE GOLDIS” ARAD
Forestry Expertise Group - Univ. Transilvania
Forest Design SRL
ICAS Statiunea Simeria
Atelierul de Cercetare si Experimentare-Productie Cluj i I.F.N. Cluj
ICAS Statiunea Oradea
ICAS Statiunea Pitesti
ICAS Statiunea Bistrita



## Annex 2: Input provided by email – Atitude Association

### Probleme:

În ciuda eforturilor Statului și autorităților privind reducerea tăierilor ilegale, în continuare riscul recoltării ilegale de masă lemnoasă este unul ridicat. Cauza este vânzarea lemnului estimat pe picior, în loc de măsurat în rampă după exploatare. Astfel în APV și amenajamentele silvice sunt suvestimate înălțimile și diametrele arborilor, ceea ce duce la un surplus semnificativ de masă lemnoasă pusă ilegal pe piață, nefiscalizată, care duce la evaziune fiscală. De asemenea sunt numeroase suprafețe de pădure neincluse în fondul forestier și care nu se supun regulilor de exploatare din fondul forestier, putând fi exploatare fără a fi regenerate ulterior și nu beneficiază de pază. Un alt aspect este dat de neîncadrarea corectă a arboretelor în categoriile funcționale corespunzătoare realității din teren în amenajamentele silvice, ceea ce duce la degradarea și compromiterea acestora. Spre exemplu numeroase arborete incluse în Catalogul Național al Pădurilor Virgine și Cvasivirgine erau încadrate eronat cu exploatări silvice în amenajamentele silvice, fiind oprite doar de către Gărzile Forestiere în urma unor sesizări. Nimeni nu a fost tras la răspundere pentru aceste erori grave, numeroase păduri virgine fiind pierdute definitiv în ultimii 15-20 ani și chiar în ultimii 5 ani. O pădure virgină exploatată își pierde definitiv acest statut. Pădurile seculare cu valoare ridicată de conservare sunt de asemenea încadrate la producție și eliminate definitiv cu tăieri progresive în cca 15 ani de la debutul tratamentului silvic, inclusiv în arii protejate. Un alt aspect este dat de derogări de exploatări forestiere în ariile protejate, cum ar fi parcurile naționale sau rezervațiile naturale, cadrul legal fiind permisiv, neclar și permițând abuzuri și exploatări la limita legalității. Drumurile de scos-apropiat nu sunt prevăzute de amenajamentele silvice și se fac prin tăieri accidentale/extraordinare în alte parcele care nu au prevăzute lucrări prin amenajament, ceea ce duce la un impact negativ major, impact care nu se supune evaluării adecvate în ariile protejate. Studiile de evaluare adecvată sunt realizate de către aceeași entitate juridică (INCDS) care realizează și amenajamentele silvice, ceea ce duce la un conflict de interese. Normele silvice nu sunt respectate în teren de cele mai multe firme de exploatare a masei lemnoase, ceea ce duce la prejudicii grave aduse mediului. Amenajările sunt mici, iar fenomenul este atât de extins, încât a devenit o normalitate.

=====  
=====  
Completare acte normative: OM 3397/2012, OM 2525/2016 referitoare la identificarea și protejarea pădurilor virgine și cvasivirgine  
OUG 57/2007 cu modificările și completările ulterioare, referitoare la ariile protejate

### Propuneri:

- separarea administrării silvice de exploatare
- exploatarea de către firme dedicate de prestări servicii, care să exploateze și să adune lemnul în rampă, fără comercializare
- vânzarea lemnului după ce a fost exploatat și măsurat în rampă
- interzicerea vânzării lemnului pe picior, estimat
- reforma și depolitizarea Romsilva
- identificarea și punerea sub protecție urgentă a tuturor parcelelor de pădure care îndeplinesc criteriile și indicatorii din OM 3397/2012 privind pădurile virgine și cvasivirgine
- sancțiuni pentru elaboratorii amenajamentelor silvice care încadrează eronat parcele în categorii funcționale necorespunzătoare realității din teren, la solicitarea administrației silvice (ocol, direcție silvică, composorat etc)
- interzicerea exploatării forestiere în parcurile naționale și rezervațiile naturale, a pădurilor periurbane
- acordarea de compensații pentru proprietarii de păduri pentru încadrarea în tipul funcțional T1
- achiziționarea de către Stat a suprafețelor private încadrate în tipul funcțional T1 sau schimbul de teren forestier cu proprietarul, pentru evitarea compensațiilor pe termen lung

### Probleme:



Există o politizare în administrația silvică. Șefii de ocoale și direcții silvice nu dau concurs pentru a fi numiți pe criterii de performanță, ci sunt numiți prin delegare, fiind șantajabili politic. Aceștia sunt revocați la ordine politice. Romsilva face atât administrare fond forestier, cât și exploatare forestieră - agent economic, cât și administrare parcuri naționale și naturale. În cazul acestora o entitate Romsilva solicită aviz pentru exploatare iar o altă entitate din Romsilva dă aviz pentru exploatarea în aria protejată, rezultând un conflict de interese evident. Gărzile Forestiere și de Mediu nu au suficient personal și resurse pentru controale constante în teren și verifică predominant sesizările primite. În vegetația din afara FFN fără amenajament nu este asigurată regenerarea corespunzător, mai mult sunt rase suprafețe întregi din cauza subvențiilor APIA pentru pajiști. Lipsa pazei pentru suprafețele de fond forestier mici sau cele din afara FFN duce la furt de masă lemnoasă și tăieri ilegale. Un alt mod de a tăia ilegal masă lemnoasă este prin drumurile de scos-apropiat, de unde cioatele sunt scoase cu rădăcini și nu mai pot fi identificate ulterior. Astfel versanți întregi sunt împânziți de drumuri ilegale, care nu au nicio finalitate.

#### Probleme:

- Cadastrul nu este realizat pentru multe zone din țară nici până în prezent - finalizarea urgentă, digitalizare
- sunt numeroase litigii și suprafețe contestate - clarificarea urgentă a acestora
- delimitarea clară a suprafețelor forestiere digital
- depolitizarea și reforma administrației silvice
- separarea administrației silvice de departamentul de exploatare și vânzare a materialului lemnos
- separarea administrației silvice de cea pentru arii protejate - trecerea ariilor protejate în administrare la ANANP, cu finanțare din bugetul de Stat
- numirea personalului silvic doar în urma unor concursuri, pe criterii de performanță și interzicerea numirilor prin delegări
- administrarea și paza fondului forestier din ariile protejate cu structuri dedicate doar de către rangerii și personalul ariei protejate, pentru evitarea suprapunerii cu ocolalele silvice

#### Probleme:

În APV și amenajamentele silvice sunt subestimate înălțimile și diametrele arborilor, ceea ce duce la un surplus semnificativ de masă lemnoasă pusă ilegal pe piață, nefiscalizată, care duce la evaziune fiscală. Acestea nu mai pot fi verificate ulterior, după secționarea arborilor. Se fac APV-uri pt tăieri accidentale sau extraordinare pentru drumuri de scos-apropiat în parcele care nu au prevăzute lucrări silvice prin amenajamente. La tăerile accidentale, calamități, uscări, doborâturi etc sunt extrași și arbori sănătoși, doar pentru beneficiul economic. În păduri seculare cu valoare ridicată de conservare, păduri virgine/cvasivirgine, rezervații naturale, parcuri naționale sunt autorizate recoltări de masă lemnoasă din cauza neîncadrării corecte a acestora în amenajamentele silvice, deși acestea ar fi necesar să fie excluse de la intervențiile silvice, ceea ce constituie o degradare și afectare a bunurilor celor mai valoroase ale patrimoniului natural.

#### Propuneri:

- este necesar un cadru legal clar și coerent referitor la separarea clară a pădurilor cu rol economic, social-recreativ și ecologic în amenajamentele silvice, astfel ca ultimele 2 categorii să fie excluse de la tăieri principale, iar delimitarea acestora să fie realizată clar, transparent și în urma unor consultări publice cu toți factorii interesați, la conferința a 2-a de amenajare
- sancțiuni pentru elaboratorii amenajamentelor silvice care încadrează eronat parcele în categorii funcționale necorespunzătoare realității din teren sau care prevăd lucrări silvice imposibil de realizat într-o anumită zonă fără acces, la solicitarea administrației silvice (ocol, direcție silvică, posesor etc)
- interzicerea exploatării forestiere în parcurile naționale și rezervațiile naturale, a pădurilor periurbane
- separarea administrării silvice de exploatare
- exploatarea de către firme dedicate de prestări servicii, care să exploateze și să adune lemnul în rampă, fără comercializare
- vânzarea lemnului după ce a fost exploatat și măsurat în rampă



- interzicerea vânzării lemnului pe picior, estimat

Automatic translation:

Despite the efforts of the State and the authorities regarding the reduction of illegal cutting, the risk of illegal timber harvesting is still high. The reason is the sale of timber estimated by the foot, instead of measured in the ramp after logging. Thus, in the APV and the forestry arrangements, the heights and diameters of the trees are underestimated, which leads to a significant surplus of wood mass illegally put on the market, untaxed, which leads to tax evasion. There are also numerous areas of forest not included in the forest fund and not subject to the exploitation rules of the forest fund, which can be exploited without being subsequently regenerated and do not benefit from protection. Another aspect is given by the incorrect classification of the stands in the functional categories corresponding to the reality on the ground in the forest management, which leads to their degradation and compromise. For example, numerous stands included in the National Catalog of Virgin and Quasi-Virgin Forests were mistakenly classified as forestry exploitations in the forest management, being stopped only by the Forest Guards following reports. No one has been held accountable for these serious errors, many virgin forests have been permanently lost in the last 15-20 years and even in the last 5 years.

A exploited virgin forest permanently loses this status. Secular forests with high conservation value are also included in the production and definitively eliminated with progressive cuts in about 15 years from the beginning of the forestry treatment, including in protected areas. Another aspect is given by exemptions from forest exploitation in protected areas, such as national parks or nature reserves, the legal framework being permissive, unclear and allowing abuse and exploitation at the limit of legality. The access roads are not provided by the forestry facilities and are made by accidental/extraordinary cuttings in other plots that have not provided for landscaping works, which leads to a major negative impact, an impact that is not subject to adequate assessment in the protected areas. Adequate assessment studies are carried out by the same legal entity (INCDS) that also carries out forestry management, which leads to a conflict of interest. Forestry rules are not respected in the field by most timber exploitation companies, which leads to serious damage to the environment. The fines are small, and the phenomenon is so widespread that it has become normal

Completion of normative acts: OM 3397/2012, OM 2525/2016 regarding the identification and protection of virgin and quasi-virgin forests

GEO 57/2007 with subsequent amendments and additions, regarding protected areas

Proposals:

- separation of forestry administration from exploitation
- exploitation by dedicated service companies, which exploit and collect the wood in the ramp, without commercialization
- selling the wood after it has been harvested and measured in the ramp
- banning the sale of wood by the foot, estimated
- the reform and depoliticization of Romsilva
- the identification and urgent protection of all forest plots that meet the criteria and indicators of OM 3397/2012 regarding virgin and quasi-virgin forests
- sanctions for the developers of the forestry arrangements who erroneously place parcels in functional categories that do not correspond to the reality on the ground, at the request of the forestry administration (detour, forestry directorate, composition office, etc.)
- prohibition of logging in national parks and nature reserves, peri-urban forests
- the granting of compensations to forest owners for the inclusion in the functional type T1
- the purchase by the State of the private surfaces classified in the T1 functional type or the exchange of forest land with the owner, to avoid long-term compensations

Problems:



- The cadastre is not completed for many areas in the country even up to now - urgent completion, digitization
- there are numerous disputes and contested areas - their urgent clarification
- the clear delimitation of forest areas digitally
- depoliticization and reform of forestry administration
- the separation of the forestry administration from the department of exploitation and sale of wood material
- the separation of forestry administration from that for protected areas - the transfer of protected areas to the administration of ANANP, with funding from the State budget
- the appointment of forestry staff only following competitions, based on performance criteria and the prohibition of appointments by delegation
- the management and guarding of the forest fund in the protected areas with dedicated structures only by the rangers and the staff of the protected area, in order to avoid overlap with the forest bypasses

#### Problems:

in VPA and forestry management, tree heights and diameters are underestimated, leading to a significant surplus of illegally marketed untaxed timber leading to tax evasion. These can no longer be checked later, after sectioning the trees. APVs are made for accidental or extraordinary cuttings for access roads in plots that have not provided for forestry works through landscaping. In case of accidental cuttings, calamities, droughts, fellings, etc., healthy trees are also extracted, just for the economic benefit. In centuries-old forests with high conservation value, virgin/quasi-virgin forests, nature reserves, national parks, harvesting of woody mass is authorized due to their incorrect inclusion in forestry management, although they should be excluded from forestry interventions, which constitutes a degradation and damage to the most valuable assets of the natural heritage.

#### Proposals:

- a clear and coherent legal framework is necessary regarding the clear separation of forests with an economic, social-recreational and ecological role in forestry, so that the last 2 categories are excluded from main cutting, and their delimitation is carried out clearly and transparently and following public consultations with all stakeholders, at the 2nd planning conference
- sanctions for developers of forestry plans who erroneously place parcels in functional categories that do not correspond to the reality on the ground or that provide for forestry works that are impossible to carry out in a certain area without access, at the request of the forestry administration (detour, forestry directorate, composition office, etc.)
- prohibition of logging in national parks and nature reserves, peri-urban forests
- separation of forestry administration from exploitation
- exploitation by dedicated service companies, which exploit and collect the wood in the ramp, without commercialization
- selling the wood after it has been harvested and measured in the ramp
- banning the sale of wood by the foot, estimated

#### General comments:

- The feedback provided is relevant from some indicators and were addressed in non-negligible indicators e.g. i10, i11, i12, i13, i19, i20, i21, i34, i35, i54, i58, i60
- The proposed mitigation measures are nevertheless aiming at legal changes and do not address mitigation measures for the companies operating in the supply chain



### Annex 3: National forest guard position on indicators 55-57



MINISTERUL MEDIULUI  
APELOR ȘI PĂDURILOR

GARDA FORESTIERĂ  
NAȚIONALĂ

**CABINET INSPECTOR GENERAL**

Nr. 6057/14.11.2024

**Către:** UNIVERSITATEA TRANSILVANIA BRAȘOV  
Facultatea de Silvicultură și Exploatare Forestiere

**În atenția:** Domnului Prodecan Florin Hălăliștean

**Referitor:** Solicitarea dumneavoastră nr.289/05.11.2024, referitoare la revizuirea Evaluării centralizate și naționale FSC a riscurilor pentru România în aprovizionarea cu lemn

Stimate domnule prodecan,

Urmare a solicitării dumneavoastră nr.289/2024, referitoare la revizuirea Evaluării centralizate și naționale FSC a riscurilor pentru România în aprovizionarea cu lemn, vă comunicăm că în toate cele trei cazuri specificate, nu există date și dovezi privind schimbarea categoriei de folosință forestieră în folosință agricolă, încălcarea legislației privind defrișarea terenurilor forestiere și conversia acestora în exploatare agricole, respectiv încălcarea legislației privind regenerarea pădurilor naturale care să ducă la degradarea acestora.

Cu stimă,

**p. INSPECTOR GENERAL**

Eugen GIOANCĂ



Translation: Regarding the FSC Risk Assessment on wood supplying we don't have data and evidences on changing the land use category from forestry to agricultural use, on deforestation and conversion to agricultural use or breaking the law of regeneration of natural forests that can conduct to degradation.

Calea Plevnei, nr. 139, sector 6, București  
e-mail: [cabinet\\_inspectoraeneral@gfn.gov.ro](mailto:cabinet_inspectoraeneral@gfn.gov.ro)  
website: [gfn.gov.ro](http://gfn.gov.ro)

Pagină 1 din 1



## Annex 4: RNP-Romsilva position on indicators 54-57



Contează pentru viitor!

REGIA NAȚIONALĂ A PĂDURILOR - ROMSILVA

Str. Petricani, Nr. 9A, Sector 2, București; Cod poștal 023841

ONRC: J40/450/1991; CUI: RO1590120

Telefon: 0040/ 021/ 317.10.05; Fax: 0040/ 021/ 316.84.28;

E-mail: office@rnp.rosilva.ro; Pagina web: www.rosilva.ro

Nr. 14266 /MDS/ 15 11 2024

**Facultatea de Silvicultură și Exploatare Forestiere Brașov**

**Grupul de lucru pentru Evaluarea FSC a riscurilor la nivel național**

**În atenția Dlui Florin HĂLĂLIȘAN – Prodecan**

**Referitor la:** comentarii/observații indicatori 54, 55 și 57 din evaluarea de riscuri FSC la nivel național

### **Indicatorul 54 – Due Dilligence**

Existența și actualizarea/upgradarea permanentă a sistemului SUMAL, cu perspectivele de îmbunătățire conform versiunii 3.0 (imagini satelitare, camere de supraveghere, tehnologie Lidar, funcționalitate în sistem offline, sisteme de monitorizare suplimentare pentru mijloacele de transport, măsurarea automată a volumului de lemn din mijlocul de transport etc) asigură un sprijin real pentru toți operatorii în vederea dezvoltării unui sistem propriu DDS, care să elimine sau diminueze riscurile introducerii pentru prima dată pe piața internă a lemnului recoltat ilegal sau a produselor derivate rezultate din acesta. În plus, nominalizarea Gărzii Forestiere Naționale ca și autoritate competentă pentru punerea în aplicare a regulamentului EUDR (HG nr. 1029/2024), planificarea unor mecanisme eficiente de control intern sau extern (metodologie de control, cu prioritizarea controalelor în zonele expuse la risc), dublată de reglementarea unor măsuri drastice de sancționare a activităților ilegale, instruirile periodice ale angajaților, monitorizarea permanentă a modului în care sunt emise documentele de vânzare sau însoțire a materialului lemnos etc asigură un cadrul de reglementare suficient care poate demonstra preocupările continue pentru adaptarea la noile cerințe europene din domeniul silvicultură și exploatare forestiere. În plus, la nivel de țară, au fost adoptate o serie întreagă de acțiuni care să soluționeze chestiunea infringementului pe păduri: revizuirea amenajamentelor silvice din prisma procedurii referitoare la evaluarea de mediu a acestora, elaborarea studiilor de evaluare adecvată și a rapoartelor de mediu, identificarea speciilor și habitatelor vulnerabile din Siturile Natura 2000, respectiv corelarea operațiunilor forestiere (tratamente, lucrări de îngrijiri etc) cu măsurile de conservare a acestor specii și habitate vulnerabile, adoptarea unor măsuri concrete de refacere a habitatelor forestiere deteriorate (O.M. nr. 1063/2024), migrarea către SUMAL 3.0 etc. Toate aceste aspecte demonstrează progresul real făcut de România în ultimii ani în ceea ce privește domeniul referitor la păduri, scăderea continuă a volumului lemnului tăiat ilegal în România fiind doar unul din rezultatele acestor preocupări. În majoritatea cazurilor, acuzațiile referitoare la tăierile ilegale din România, apărute în mass media și preluate ulterior și în diferite publicații internaționale, se dovedesc, în urma unor controale efectuate în teren, ca fiind nefondate și nereale, aducând grave prejudicii de imagine sectorului forestier. Cifrele oficiale furnizate de instituțiile statului (Garda Forestieră, INS, RNP etc) demonstrează că



tăierile ilegale din România sunt la un nivel mult inferior față de cel adus în spațiu public de diverse entități private, cu diverse interese mai mult sau mai puțin cunoscute.

La nivelul RNP-Romsilva, există implementat deja, de foarte mult timp, un sistem eficient Due Dilligence, care se actualizează/revizuieste permanent, corelat cu schimbările legislative și cu potențialele riscuri ce pot fi identificate pe parcursul implementării lui. Totodată volumul tăierilor ilegale în ultimii 10 ani, stabilit în urma controalelor efectuate în teren, demonstrează un trend descendent - de la un volum de cca 57 mii mc în anul 2014 la cca 23 mii în anul 2023, în fondul forestier proprietate publică a statului. Aceeași tendință se manifestă și în suprafețele de pădure aparținând altor deținători (primării, biserici, persoane juridice, persoane fizice), care au încheiate contracte de administrare sau prestări servicii cu RNP Romsilva pentru acele suprafețe (de la cca 28 mii mc cubi tăiați ilegal în anul 2014, la cca 14 mii mc tăiați ilegal în anul 2023).

Având în vedere cele precizate anterior, ne menținem punctul de vedere emis în cadrul Grupului de lucru - cel referitor la încadrarea ca risc **neglijabil** al indicatorului legat de sistemul Due Dilligence.

#### **Indicatorul 55 – Conversie din pădure naturală în agricultură, după 31 decembrie 2020**

Conversia pădurilor în terenuri cu altă destinație (agricultură) este un aspect total nesemnificativ și irelevant în România, prin Codul Silvic fiind interzisă reducerea suprafeței fondului forestier, cu câteva excepții, agricultura nefiind însă una dintre aceste excepții. În mod concret, la nivelul RNP-Romsilva, în perioada 2021-2024 nu a avut loc nicio astfel de conversie a suprafețelor de pădure în terenuri agricole, majoritatea situațiilor în care au fost înregistrate „conversii” (scoateri definitive din fondul forestier național) fiind reprezentate de realizarea/construcția unor proiecte de infrastructură, adesea declarate de interes național și de utilitate publică (ex. autostrăzi, drumuri naționale, aducțiuni de apă, rețele de electricitate, construcția unor pârtii de ski, realizarea unor obiective turistice, construcția unor obiective de interes social - cimitire etc). În unele situații, în funcție de obiectivul investiției, pentru terenurile scoase definitiv din fondul forestier au fost oferite în compensare terenuri cu alte destinații, care au fost ulterior împădurite, fără a fi diminuată astfel suprafața de fond forestier național. În orice caz, suprafața cumulată a unor astfel de terenuri scoase definitiv din fondul forestier național este extrem de redusă (cca 80 ha în anul 2021, cca 104 ha în anul 2022, cca 90 ha în anul 2023 și cca 52 ha în anul 2024) comparativ cu suprafața totală a fondului forestier național (cca. 6,7 milioane ha, din care cca 3,1 milioane ha reprezintă fond forestier proprietate publică a statului), nefiind astfel creat niciun impact asupra pădurilor.

Din aceste motive, consideram că pentru acest indicator riscul trebuie menținut la nivelul **neglijabil**, indiferent de politicile și procedurile FSC referitoare la conversie, care solicită desemnarea implicită a acestui indicator la nivelul neneglijabil.

#### **Indicatorul 57 – Degradarea pădurilor primare după 31 decembrie 2020**

Sistemul silvicultural românesc se bazează pe promovarea tipului fundamental de pădure, pe asigurarea unei diversități de specii autohtone adaptate condițiilor staționale, pe asigurarea unei stări de sănătate și vitalitate corespunzătoare a arboretelor, pe prevenirea degradării pădurilor ca urmare a acțiunilor destabilizatoare a unor factori biotici sau abiotici. Ținta acestor obiective este tocmai obținerea unor arborete cât mai apropiate de starea lor naturală, accentul fiind pus în special pe regenerarea naturală, cu specii autohtone, în detrimentul regenerării artificiale care ocupă o pondere redusă din totalul suprafețelor regenerate anual. Tratamentele silvice, lucrările de îngrijire (degajări, curățiri, rărituri), tăierile de conservare, de igienă sau extragerea masei lemnoase afectate de diversi dăunători (produse accidentale) aplicate de peste 100 de ani în România au exact rolul de a preveni degradarea pădurilor. Constituirea fondului de conservare și regenerare a pădurilor (inclusiv pentru proprietarii privați) este o obligație legală menită să asigure regenerarea suprafețelor parcurse cu tăieri sau pentru ajutorarea regenerărilor naturale deja instalate. Chiar și în cazul în care proprietarii nu realizează lucrările de regenerare a pădurii din motive imputabile lor, există prevederi legale ca aceste lucrări să fie executate forțat, putându-se ajunge chiar la executarea silită din acest motiv.

Nu avem cunoștință despre niciun fenomen de degradare a pădurilor primare în ultimii ani în România, ba mai mult, odată cu apariția Catalogului Național al Pădurilor Virgine și Cvasivirgine



toate arboretele care îndeplineau condițiile/criteriile specificate în legislație, au fost introduse în zona de non-intervenție (protecție strictă), fiind interzisă prin lege exploatarea masei lemnoase în astfel de suprafețe.

Ca urmare, considerăm că și acest indicator trebuie menținut la nivelul de **risc neglijabil**. Nu înțelegem și nu avem cunoștință despre metodologia și informațiile care au fost utilizate la elaborarea de către FSC a instrumentului numit FSC Forest Degradation Dashboard (conform căruia multe regiuni din România depășesc pragul de degradare de 0,02%), însă considerăm că trebuie analizat cu mare atenție acest instrument, întrucât există temeri justificate referitoare la includerea unor suprafețe supuse tratamentelor silvice aflate în desfășurare (tăieri de produse principale), lucrărilor de îngrijire (produse secundare), lucrărilor de conservare, tăierilor de igienă sau de extragere a produselor accidentale etc. în categoria pădurilor degradate, lucru care îl considerăm total inacceptabil. Foarte probabil trebuie revizuit acest instrument elaborat de FSC ci nu nivelul de risc pentru acest indicator valabil pentru România (în sensul modificării lui de la nivelul neglijabil la neneglijabil).

**DIRECTOR GENERAL,**

**Marius – Dan SÎIULESCU**





## **Translation of Address from National Forest Administration RNP-Romsilva (Annex 4)**

### **Specific Comments to Indicators 54, 55, 57.**

#### **Indicator 54 - Due Diligence**

The existence and permanent updating/upgrading of the SUMAL system, with the prospect of upgrading to version 3.0 (satellite images, surveillance cameras, Lidar technology, offline functionality, additional monitoring systems for means of transport, automatic measurement of the volume of timber in the means of transport, etc.) provides real support for all operators to develop their own DDS system, which eliminates or reduces the risks of illegally harvested timber or derived products thereof being introduced for the first time on the domestic market. In addition, the nomination of the National Forest Guard as the competent authority for the implementation of the EUDR Regulation (GD no. 1029/2024), the planning of efficient internal or external control mechanisms (control methodology, with prioritization of controls in areas at risk), coupled with the regulation of drastic measures to sanction illegal activities, regular training of employees, permanent monitoring of the way in which the documents for sale or accompanying timber are issued, etc. ensure a sufficient regulatory framework that can demonstrate the continuous concerns for adaptation to the new European requirements in the field of forestry and logging. In addition, at national level, a whole series of actions have been taken to address the issue of forest encroachment: revision of forest management plans in the light of the procedure for their environmental assessment, preparation of appropriate assessment studies and environmental reports, identification of vulnerable species and habitats in Natura 2000 sites, and the linking of forestry operations (treatments, maintenance works, etc.) with measures to conserve these vulnerable species and habitats, adoption of concrete measures to restore damaged forest habitats (O. M. no. 1063/2024), migration towards SUMAL 3.0, etc. All these aspects demonstrate the real progress made by Romania in recent years in the field of forests, the continuous decrease in the volume of illegally felled timber in Romania being only one of the results of these concerns. In most cases, the allegations of illegal logging in Romania, which have appeared in the media and subsequently picked up by various international publications, have, following on-the-spot checks, been shown to be unfounded and untrue, causing serious damage to the forestry sector's image. Official figures provided by state institutions (Forest Guard, INS, NFA, etc.) show that illegal logging in Romania is at a much lower level than that brought into the public domain by various private entities with various more or less well-known interests.

An effective Due Diligence system has been in place at NFA-Romsilva for a very long time, which is constantly being updated/reviewed in line with legislative changes and potential risks that may be identified during its implementation. At the same time, the volume of illegal logging over the last 10 years, as established by field checks, shows a downward trend - from a volume of about 57 thousand cubic meters in 2014 to about 23 thousand cubic meters in 2023, in the state-owned forest stock. The same trend is also evident in the forest areas belonging to other owners (municipalities, churches, legal entities, individuals), which have concluded management or service contracts with NFA Romsilva for those areas (from about 28 thousand cubic cubic cubic meters illegally cut in 2014 to about 14 thousand cubic cubic meters illegally cut in 2023).

**In view of the foregoing, we maintain the point of view expressed in the Working Group - the one regarding the classification as negligible risk of the indicator related to the Due Diligence system.**

#### **Indicatorul 55 – Conversie din pădure naturală în agricultură, după 31 decembrie 2020**

Conversia pădurilor în terenuri cu altă destinație (agricultură) este un aspect total nesemnificativ și irelevant în România, prin Codul Silvic fiind interzisă reducerea suprafeței fondului forestier, cu câteva



excepții, agricultura nefiind însă una dintre aceste excepții. În mod concret, la nivelul RNP- Romsilva, în perioada 2021-2024 nu a avut loc nicio astfel de conversie a suprafețelor de pădure în terenuri agricole, majoritatea situațiilor în care au fost înregistrate „conversii” (scoateri definitive din fondul forestier național) fiind reprezentate de realizarea/construcția unor proiecte de infrastructură, adesea declarate de interes național și de utilitate publică (ex. autostrăzi, drumuri naționale, aducțiuni de apă, rețele de electricitate, construcția unor pârtii de ski, realizarea unor obiective turistice, construcția unor obiective de interes social - cimitire etc). În unele situații, în funcție de obiectivul investiției, pentru terenurile scoase definitiv din fondul forestier au fost oferite în compensare terenuri cu alte destinații, care au fost ulterior împădurite, fără a fi diminuată astfel suprafața de fond forestier național. În orice caz, suprafața cumulată a unor astfel de terenuri scoase definitiv din fondul forestier național este extrem de redusă (cca 80 ha în anul 2021, cca 104 ha în anul 2022, cca 90 ha în anul 2023 și cca 52 ha în anul 2024) comparativ cu suprafața totală a fondului forestier național (cca. 6,7 milioane ha, din care cca 3,1 milioane ha reprezintă fond forestier proprietate publică a statului), nefiind astfel creat niciun impact asupra pădurilor.

Din aceste motive, consideram că pentru acest indicator riscul trebuie menținut la nivelul **neglijabil**, indiferent de politicile și procedurile FSC referitoare la conversie, care solicită desemnarea implicită a acestui indicator la nivelul **neneglijabil**.

#### **Indicator 55 - Conversion from natural forest to agriculture after December 31, 2020**

The conversion of forests to land for other purposes (agriculture) is a totally insignificant and irrelevant issue in Romania, as the Forest Code prohibits the reduction of the forest area, with a few exceptions, but agriculture is not one of these exceptions. In concrete terms, at RNP-Romsilva level, in the 2021-2024 period, no such conversion of forest areas into agricultural land took place, most of the situations in which "conversions" (definitive removals from the national forest fund) were recorded being represented by the realization/construction of infrastructure projects, often declared of national interest and public utility (e.g. In some cases, depending on the purpose of the investment, the land permanently removed from the forest has been compensated by land for other purposes, which has subsequently been afforested, without reducing the area of national forest. In any case, the cumulative area of such land permanently removed from the national forest fund is extremely small (about 80 ha in 2021, about 104 ha in 2022, about 90 ha in 2023 and about 52 ha in 2024) compared to the total area of the national forest fund (about. 6.7 million ha, of which approx. 3.1 million ha is state-owned public forest land), thus creating no impact on forests.

**For these reasons, we consider that the risk for this indicator should be maintained at negligible, regardless of FSC policies and procedures on conversion, which require implicit designation of this indicator at non-negligible.**

#### **Indicator 57 - Degradation of primary forests after December 31, 2020**

The Romanian silvicultural system is based on the promotion of the fundamental forest type, on ensuring a diversity of autochthonous species adapted to seasonal conditions, on ensuring a state of health and appropriate vitality of stands, on preventing forest degradation as a result of destabilizing actions of biotic or abiotic factors. The aim of these objectives is precisely to obtain stands as close as possible to their natural state, with particular emphasis on natural regeneration with native species, to the detriment of artificial regeneration, which accounts for a small proportion of the total area regenerated each year. Silvicultural treatments, care work (clearing, pruning, thinning, thinning), conservation felling, hygienic felling or the extraction of wood affected by various pests (accidental products), which have been applied for over 100 years in Romania, are precisely designed to prevent forest degradation. The establishment of a forest conservation and regeneration fund (including for private owners) is a legal obligation designed to ensure the regeneration of areas that have been felled or to support natural regeneration already in place. Even in cases where owners fail to carry out forest



regeneration work for reasons for which they are responsible, there are legal provisions for forcing them to carry out the work, which can even lead to forced execution.

We are not aware of any degradation of primary forests in recent years in Romania, moreover, with the advent of the National Catalog of Virgin and Quasi-virgin Forests, all stands that met the conditions/criteria specified in the legislation were placed in the non-intervention zone (strict protection), being prohibited by law the exploitation of timber in such areas.

**As a result, we consider that this indicator should also be kept at negligible risk. We do not understand and have no knowledge of the methodology and information used by the FSC to draw up the FSC Forest Degradation Dashboard (according to which many regions in Romania exceed the degradation threshold of 0.02%), but we believe that this tool should be carefully analyzed, as there are justified concerns about the inclusion of areas subject to ongoing forestry treatments (felling of primary products), care works (secondary products), conservation works, hygienic felling or extraction of incidental products, etc. in the category of degraded forests, which we consider to be totally unacceptable. It is highly likely that this FSC tool needs to be revised, but not the risk level for this indicator for Romania (from negligible to non-negligible).**