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To: The Romanian Government
In the attention of: Prime Minister Nicolae-Ionel CIUCĂ
For the knowledge of: Mr. Adrian-Ionuț CHESNOIU, Minister of Agriculture and Rural Development
Mr Barna TÁNCZOS, Minister for the Environment, Water and Forests
Subject: Coordination of Government activity to ensure coherence in the cross - sectoral approach to forest policies and the allocation of financial resources

Dear Prime Minister,

You hold, through the constitutional role of leader of the executive authority, the special attribute of great importance to coordinate the activity of the members of Government, which must be exercised including aligning environmental and climate policies with agricultural and agricultural policies rural development, to reflect the significant interest in forests and conservation biodiversity at international and European level.

The Council of the European Union (EU) has recently adopted¹ the Union's Forest Strategy for 2030, Member States, through their representatives, the Ministers of Agriculture, welcoming the publication of the Strategy², agreed the use of financial support under the common agricultural policy to help forests mitigate climate change. At the same time, the European Parliament through a grounded resolution³ including the fact that forestry measures and interventions should contribute to implementation of EU Forestry Strategy for 2030, adopted⁴ a proposal for a regulation laying down rules on support for strategic plans to be developed by Member States in the framework of common agricultural policy (CAP strategic plans) and funded by the European Guarantee Fund (EAGF) and the European Agricultural Fund for Rural Development (EAFRD).

The New Common Agricultural Policy includes a series of policy reforms to support the transition to agriculture and sustainable forestry in the European Union, as well as for the achievement of the objectives set by The European Green Pact (Green Deal), pursuing a just and inclusive transition for all.

¹ <https://www.consilium.europa.eu/ro/press/press-releases/2021/11/15/council-adopts-conclusions-on-the-new-eu-forest-strategy-for-2030/> (November 15, 2021)

² https://eur-lex.europa.eu/resource.html?uri=cellar:0d918e07-e610-11eb-a1a5-01aa75ed71a1.0018.02/DOC_1&format=PDF

³ https://www.europarl.europa.eu/doceo/document/TA-9-2021-11-23-TOC_RO.html (November 23, 2021)

⁴ https://www.europarl.europa.eu/doceo/document/TA-9-2021-0456_RO.pdf

The European Court of Auditors also emphasized in its report⁵ on the financing of forests in the fact that “EU financial support for forestry is provided mainly through the European Agricultural Fund for Rural Development (EAFRD)). Expenditure on forestry measures represents, in practice, 3% of the total rural development expenditures. (...) Rural development measures for the forest sector have a limited impact on forest biodiversity and resilience to climate change, partly due to the modest level of spending on forests and of the deficiencies that exist at the level of the design of the measures. (...) The Court concluded that the common system EU monitoring program does not measure the effects of forestry measures on biodiversity and a climate change”.

In this context, **WWF Romania expresses its concern and draws attention⁶ to the way in which Romania, as a member of the European Union, intends to meet the targets set in the EU Biodiversity Strategy for 2030⁷ and The EU Forest Strategy for 2030, with an obligation not to miss the chance again achieving these objectives through the National Strategic Plan of the CAP for Romania (PNS PAC)⁸ for the period 2023-2027**, given that Romania currently has the necessary leverage to overcome chronic problems found in forests with regard to illegal logging, superior logging, protection of virgin forests, protection of habitats and species.

We remind you that the phenomenon of illegal logging that threatens Romania's forests has been introduced among the vulnerabilities to national security⁹, the national forest fund regardless of ownership constituting an asset of national interest¹⁰, and combating this phenomenon (N.B. whose effectiveness depends on an integrated approach aimed at addressing the cases), being in the attention of the Supreme Defense Council of the country of which you are vice-president.

We, therefore, address the Government of Romania and you in particular as we consider that **a strong political decision is needed at the highest level** to support the protection of forests and improving climatic conditions. This requires proactive solutions to support them financial support from European funds can only be found in the PNS CAP. Basically, the fate of the forests for the next ten years and the objectives assumed by Romania through the Green Deal are now conditioned by **allocation of financial resources under PNS for environmental and climate measures for forests.**

European Commission’s Recommendations to Member States on PNS CAP 2023-2027 encourage the proper consideration of forests, paying particular attention to the following

⁵ EU funding for biodiversity and climate change in EU forests: positive results, but Limited (2021):https://www.eca.europa.eu/Lists/ECADocuments/SR21_21/SR_Forestry_RO.pdf

⁶ <https://wwf.ro/paduri/scrisoare-deschisa-catre-guvernul-romaniei/>

⁷ https://eur-lex.europa.eu/resource.html?uri=cellar:a3c806a6-9ab3-11ea-9d2d-01aa75ed71a1.0023.02/DOC_1&format=PDF

⁸ <https://www.madr.ro/planul-national-strategic-pac-post-2020.html>

⁹ „The following constitute threats to the national security of Romania: (...) m) any actions or inactions that (...) have the effect of endangering, illegally managing, degrading or destroying natural resources, forest funds, hunting and fisheries, water and other such resources, as well as the monopolization or blocking of access to them, with national or regional consequences” according to art. 3 of Law no. 51/1991 on the national security of Romania, republished (as a modified in 2016)

¹⁰ According to art. 3 para. (1) of Law no. 46/2008 Forest Code, republished

measures related to forests, which have strong synergies with the EU's climate and biodiversity goals:

- strengthening forest protection - strict protection of at least 10% of natural habitats for
- implementation of the EU Biodiversity Strategy for 2030;
- forest area growth, ecological reconstruction of degraded forest lands, and optimizing the role of carbon storage;
- building the resilience of forests to climate change and improving socio-economic development of rural areas;
- the adoption of best practices for the management of environmentally and forest-friendly forests.

However, in the PNS proposal CAP 2023-2027, **for forests is provided to be allocated less than 0.38% of the total budget of PNS, an absolutely insignificant contribution in relation to the priorities which are required for the fulfillment of the objectives assumed** by the Green Deal and the transformation into reality of the reforms undertaken by Romania for the sustainable management of forests and protected natural areas.

It should be noted that **biodiversity data and studies are not taken into account and the real financing needs for forests**, an example in this sense being [*"The study for the elaboration methodology and calculation of Natura 2000 payments in forested areas of protected natural areas, according to the restrictions in the management plans"*](#) carried out by the National Research Institute in Forestry Development - "Marin Drăcea" whose beneficiary is the Ministry of Environment, Waters and Forests.

Therefore, having regard to at least the following:

- the targets assumed for the CAP:
- 40% of the CAP budget will need to be climate relevant and strongly support the commitment
- to dedicate 10% of the EU budget to biodiversity targets by the end period of the EU's multiannual financial framework,
- at least 35% of the funds will be allocated to measures to support climate, biodiversity, environment and animal welfare,
- the objectives assumed by Romania as an EU member state through the EU Forest Strategy for 2030, respectively the EU Biodiversity Strategy for 2030,
- the contribution of forests to long-term carbon sequestration and storage, the relevance for biodiversity conservation and the importance of ecosystem services for sustainable development of local communities, especially in rural areas,
- the need to support the reforms undertaken by the Government of Romania through the National Plan of Recovery and Resilience and measures assumed for forests through the Government Program 2021-2024 (including: protection of high conservation value forests and
- the establishment of a compensation system granted to forest owners in naturally protected areas, combating illegal logging, supporting non-invasive technologies and equipment
- and the reform of the way of capitalizing on wood),

Considering your role, we ask:

1. to ensure better cooperation between the Ministry of Agriculture and Rural Development and the Ministry of Environment, Waters and Forests, as well as with the relevant subordinate institutions, for safeguarding the achievement of the objectives of European strategies in the field of biodiversity and forestry;
2. public debates with the effective involvement of all stakeholders for the elaboration of the PNS so that all legitimate interests, including those of the communities, dependent on these natural resources, are taken into account to ensure a fair green transition for local communities;
3. the allocation of at least 10% of the total PNS budget for environmental and climate measures for forests reflecting the contribution of forests in these areas.

We are confident that you will facilitate a firm political decision to secure the necessary funding for forests within the PNS (NSS), in order to meet the climate and environment objectives, and the fulfillment of the objectives assumed by Romania at European and international level.

Respectfully,

Orieta Hulea,
Director of WWF Romania