



Nr. 390 / 07.12.2021

To: Ministry of Environment Water and Forests
In the attention of: Mr. Secretary of State George Mierliță
For the knowledge of: Mr. Florin Achim - Technical Development Director, INCDS-MD
Regarding: “The study for the elaboration of the methodology and calculation of Natura 2000 payments in the forest areas in protected natural areas, according to the restrictions in the management plans”, elaborated by "Marin Drăcea" National Forestry Research and Development Institute

Dear Secretary of State,

WWF Romania is actively involved in the efforts of sustainable management of forests and protected areas of community interest, and through our projects we have promoted and supported with consistently the particularly important role that compensatory payments play in achieving these conservation objectives in Natura 2000 sites and the protection of high conservation values sheltered by forest ecosystems.

In the current context, represented by the urgency of elaborating the National Strategic Plan PAC an important role goes to “The study for the elaboration of the methodology and the calculation of the Natura 2000 payments from the forest areas from protected natural areas, according to the restrictions from the management plans” made by the National Forestry Research and Development Institute "Marin Drăcea", whose beneficiary is the Ministry for Environment Waters and Forests Given that on the conclusions and recommendations of this Study is it is possible to build forest-related measures under the National Strategic Plan, we consider it is particularly important that, prior to the final receipt of this Study, the Ministry should organize a consultation with stakeholders / affected parties. Through this approach, the Ministry would ensure that they all aspects of income loss and costs supported by forest owners / administrators were taken into account.

Given the involvement of our organization in the development process coordinated by INCDS - MD,

We enclose WWF Romania's proposals on this topic. As far as you consider of interest organizing such a debate, please provide us with the date and contact details for the event.

Regards,

Radu Vlad
WWF Romania Forestry Program Manager

WWF Romania's proposals submitted to the National Institute for Research and Development in Forestry Marin - Dracea by the address No. 490 / 16.09.2021

1. The management of the stands must be done through special conservation works

WWF Romania proposals:

WWF has developed a study on the calculation of the owner's income loss for trees exempted from any kind of intervention in the **Solidaron** project.

(https://wwfeu.awsassets.panda.org/downloads/metodologie_v2_final_1.pdf). In this regard, we propose taking into account the solutions identified in this project, which aimed to improve the calculation formula from OM 625/2006 (currently repealed).

This calculation solution shall also take into account the status of the trees for which restrictions are imposed, thus respecting the provisions of the Forestry Code (art. 25, paragraph 3) regarding the quantification of the wood volume unharvested.

At the same time, we draw attention to the loss of revenue / additional administrative costs generated by the restrictions imposed in the application of forestry operations in terms of intensity and / or periodicity works.

2. Returning to natural habitat types by removing inappropriate stands in terms of vegetation status and species composition.

WWF Romania proposals:

In this regard, we propose quantifying of direct costs related to the adoption of forestry operations specific for stands replacement / restoration works (differentiated for different types of habitats), respectively the quantification of the income losses calculated for the entire production cycle having considered the different productivity of the stands.

We also consider that not only the return to the natural types of forest habitats represents an effort but, in many cases, even preserving the fundamental natural type of forest can be a unquantified loss to the forest owner. Promoting the fundamental natural type of forest is based on environmental considerations without quantifying the economic aspects.

3. Maintaining a quantity of 5% dead wood / ha

WWF Romania proposals:

Dead wood has a special value from the perspective of biodiversity but, according to the owner this is an irrecoverable loss, at least in terms of wood quality.

It is very important to define the concept of "dead wood". From a conservation perspective biodiversity is internationally recognized that "dead wood" does not include only lifeless trees or parts of trees, and the definition of this concept should not be limited to the dimensional component.

"Dead wood" also means "biodiversity trees", veteran trees (ie trees that are still alive with holes, rot, cracks, etc.).

Also, in the management and quantification of "dead wood" it is extremely important to have a forest landscape approach (PU, production unit, basin, protected area), and NOT at unit level / exploitation site, possibly surface unit (m² or ha). In this regard, we consider it particularly important to develop a methodology for monitoring dead wood at "forest landscape" level. A

scientific methodology that could be considered in this meaning is the one proposed by USV within the RESFOR project.

A particularly important component (even if it cannot be included in the concept of "dead wood"), with an important role in the functionality of the forest and the maintenance of its productivity, is represented by the peaks, the branches and exploitation residues (biomass that remains in the forest most often in the form of pile of debris but which are included in the APV the act of enhancement), which is a loss for the owner and a gain for biodiversity. We propose to further develop a methodology for quantifying these costs - we see an increase of demand for biomass in the future, which will make the harvesting of peaks, branches and exploitation debris also became profitable.

4. Restriction on the use of prophylactic means of pest control and chemical treatment in or within 100 m (200 m) around species-friendly habitats

WWF Romania proposals:

We would like to inform you that in terms of the management and use of chemicals, there are a number of provisions in the FSC certification standards (which we consider to be good practice measures). That is why we consider it necessary to make calculations, both for the scenario in which no chemicals are used, as well as for the one in which substances accepted in the rules of good practices are used. In this regard, the costs for risk assessments should also be included, respectively homologation of these chemicals in forestry in Romania.

5. Declaring quiet areas around nests and limiting / controlling forestry activities during the nesting period for the protection of some species;

WWF Romania proposals:

We assume first of all the establishment of unitary areas at national level for different species. In the RESFOR project, dead wood is defined as the total volume of trees or parts of trees standing or felled, with a diameter of ≥ 7 cm (including the bark, at the thin end - the minimum diameter is still under debate) and a minimum length of 1.0 m. From a broader perspective of the biodiversity contribution of dead wood, it can be:

- veteran trees;
- live trees with, cracks, holes, dead or rotten parts
- live trees, lanceolate or dead, considered special in terms of species, shape or size
- operating residues left on site after harvesting, standing or on the ground, in a process of decomposition and having diameters greater than 7 cm and lengths exceeding 1 m (this class also includes rotten branches)

Assessments should include direct costs related to field delimitation of areas, mapping and materialization on maps / sketch of the exploitation site, APV (act of enhancement) Annex, training / information of economic agents on the occasion of handing over the exploitation site, additional monitoring of the objectives to be preserved on the occasion of operational controls and the readmission of exploitation sites.

The (indirect) costs of fragmentation should also be taken into account and the increase intensity of forestry operations, given that in most cases, long-term harvesting of timber is not prohibited. In this sense, a cost modeling through operating projects that take into account different

intensities of application of forestry operations / extraction volumes would be useful. Additional expenditure should also be considered for additional trips for tree marking and the preparation of new acts of enhancement (APVs), together with costs of organizing auctions, handing over the exploitation site, organizing the operating site, resumption of exploitation of the exploitation site etc.

The costs of imposing period and operating restrictions should also be estimated (e.g. nesting periods, breeding grounds, etc.). The same volume of work done in a much shorter time and in more difficult conditions means additional mobilization of resources for certain periods of time - all this organization of the work front means higher unit costs. Last but not least, the economic losses generated should take into account the substantial change in cash flow in the forestry administration budget.

IMPORTANT: Failure to intervene in a timely manner by restricting forestry interventions (extraction of trees with broken tops, felled, insect attacks, trunk injuries caused by wildlife, etc.) even for short periods (6-12 months) inevitably lead to depreciation of wood quality and consequently the value of the wood decreases. By this methodology these costs will have to be taken into account, costs which result from the depreciation of the quality of "timber stocks", as real estate of the owners and not just the costs of restricting the possibility. (eg a felled tree if extracted in due time it does not get to depreciate further nor the quality of the resulting wood; but if we intervene after 6-12 months, the whole amount can be considered as firewood, and later it is possible it is no longer justified to be harvested economically wise).

Note: The proposals specified for this measure should be considered, as appropriate, for the other situations.

6. Maintaining a mosaic forest structure, by preserving clusters of 3-5 old trees - over 80 years old;

WWF Romania proposals:

Analysis at a landscape level of the mosaic structure. Trees in the aging islands are trees of superior quality to dead wood. Aging islands can influence design and maintenance of forestry infrastructure and even transport routes. Estimation of administrative costs, identification and materialization in the field as well as mapping and monitoring of the aging islands thus considered.

7. Prohibition on the construction of new forest roads and new exploitation roads in the site or parts thereof;

WWF Romania proposals:

Increasing the distances for tractor roads for harvested timber and the need for action to reduce the impact on the environment (crossing bridges, restrooms, leveling of tractor roads, etc.). Increasing the inevitable damage caused by logging without adequate infrastructure also leads to a deterioration in the quality of the timber and in consequently the value of the remaining timber stocks decreases. Increasing operating costs by investing in environmentally friendly equipment - cableway

8. The equivalent value of the loss of income generated by the environmental procedures imposed at the elaboration the management plan (forest management) and the performance of forest management specific works.

WWF Romania proposals:

The costs for the full environmental assessment procedure and the mandatory procedures imposed on carrying out specific works for forest management.

Mapping in STEREO70 the forest areas that are the subject of the decennial forest planning and their transposition into GIS.

Monitoring of required conservation measures. In accordance with the law, obligations the owner of the forest planning regarding the environmental component is not limited only to the approval phase.

These are manifested later by monitoring the implementation of forest management reports.

The monitoring reports also include the observation of the conservation status of protected species and habitats, in the case of forest planning that may affect Natura 2000 sites.

It is important that the report also captures the technical adaptations that are required for conservation measures, beyond the specifications found in the task book. Consequently, do not develop proposals related only to the current legislative framework, but also in relation to the best technical solutions that are considered to be imposed.

About WWF (World Wide Fund for Nature)

Founded in 1961, WWF is one of the world's leading international project organizations for nature conservation in over 100 countries. WWF's global mission is to stop environmental degradation and build a future in which people live in harmony with nature. More details at: www.wwf.ro