



February 6th, 2023

To: The Ministry of Environment, Water and Forests

In attention of:

For the record:

Concerning: consultation on the Government Decision Draft for the approval of the substantiation note on the necessity and appropriateness of incurring investment expenditure related to the project "*Increased capacity for forest surveillance, control and monitoring by means of an integrated information system*"

Following the publication on January 25th, 2023 in public consultation of the Government Decision Draft for the approval of the substantiation note on the necessity and appropriateness of incurring investment expenditure related to the project "*Increased capacity for forest surveillance, control and monitoring by means of an integrated information system*", being within the legal deadline for consultation, we transmit below the opinions and proposals of WWF Romania regarding the draft legislative act subject to consultation.

- (1) In line with the provisions of the Government Programme 2021-2024, the use of the latest technologies is demanded to develop [modern digital timber volume measurement tools](#)¹, so as to provide an adequate response to the current challenges in the forest sector. We draw attention to the fact that current control procedures and tools do NOT allow for an expeditious measurement of transported volumes, i.e. the elimination of the subjectivity of the human factor, which undermines the efficiency of the control system carried out on the ground right in the area of the first introduction of timber on the market. The development of such an application (AI/IT) would also have a positive impact on increasing the competitiveness of the national forestry sector by reducing the costs of timber measurement and data operation in SUMAL.
- (2) The development of a tool for expedient digital measurement of the volume of wood mass is also essential for the practical implementation of the provisions of the [National Forest Strategy \(NFS30\)](#). Relevant in this respect are the provisions of DSA2 and DSA13, indicator of achievement "*Expert control is supported by methods and tools for monitoring the quantities of wood transported and the uniqueness of transports, to combat non-compliant practices*"².
- (3) We also draw attention to the fact that the investments related to the project "*Increased capacity for forest surveillance, control and monitoring by means of an integrated information system*" should be able to support the resolution of the [main current problems](#)³ of the integrated IT system for tracking timber traceability (SUMAL) as part of the control system. In this respect, we refer in particular to the following [shortcomings repeatedly highlighted](#)⁴: (i) it cannot support an automated and expeditious verification of data/pictures

¹ https://gov.ro/fisiere/programe_fisiere/Program_de_Guvernare_2021%E2%80%942024.pdf

² <https://www.strategieforestiera.ro/process/snp30>

³ <https://cdn.wwf.ro/uploads/2022/05/24163913/WWF-Raport-monitorizare-video-in-padure.pdf>

⁴ <https://cdn.wwf.ro/uploads/2023/01/18112328/Prezentare-Amprenta-Digitala.pdf>

recorded in SUMAL 2.0, (ii) it cannot prevent the fraud of records in terms of declared quantity/quality (i.e. "over-loading" as the main modus operandi in relation to the placing on the market of timber harvested in violation of the applicable legislation) and (iii) it is not sized to automatically generate alerts that are subsequently followed up as a matter of priority in a control planning that follows a transparent risk approach.

- (4) We reiterate in this regard the necessity/appropriateness to develop an AI/IT solution that (i) can automatically encrypt the uniqueness of each timber shipment (e.g. based on a set of standardized collected photos), (ii) automatically generate an "electronic seal" of the transported timber materials, together with (iii) expeditious determination of volumes (with a reasonable tolerance and eliminating human subjectivity). In the hope that such applications can be developed with the help of these investments, we forward as an example the concept of a "transport [fingerprint](#)"⁵ supported by WWF Romania.
- (5) We deem it appropriate and necessary to make use of these funds also for the *establishment and operation of the National Forest Register* (digitization part), as provided for in the NPS30 (DSA9), precisely in order to increase the capacity of supervision, control and monitoring of forests at national level.

In view of the need for judicious use of RRNP funds, we reiterate the need to increase the transparency of the decision-making process in order to design and develop viable solutions aimed at increasing the capacity for forest control and monitoring, in line with the provisions of NFSO30/ National Forest Strategy Outline (N.B. the transposition of these provisions is to be achieved through the revision of the Forest Code and subsequent legislation by the end of Q2 /2023). We also take this opportunity to state our willingness to be involved with expertise as far as the authority will proceed to a greater openness and involvement of stakeholders in the entire process.

Sincerely,

WWF Romania