



WWF-Romania's Position Paper on the First National Catalogue of Priority Areas for Biodiversity

1. Executive summary

WWF-Romania welcomes the publication in the Official Gazette of the first [National Catalogue of Priority Areas for Biodiversity](#) (PABs) and considers the operationalisation of the mechanism an important institutional outcome for fulfilling Romania's commitments under the EU Biodiversity Strategy for 2030.

The fundamental outcome of this stage is the simultaneous existence of the legal framework establishing the concept of Priority Areas for Biodiversity in the Law on Protected Natural Areas, the identification methodology and the first Catalogue, instruments without which the 10% strict protection target would have lacked practical implementation mechanisms.

WWF-Romania particularly appreciates the agreement of the National Forest Administration, Romsilva, to include approximately 340,000 ha of the publicly owned state forest estate in the first version of the Catalogue. This area exceeds the threshold of 10% of all state forests and represents the main component of the forest contribution to the current Catalogue, complementing the areas placed under strict protection to date.

At the same time, the publication of the first Catalogue does not conclude the process and does not unconditionally validate the methodology currently in force. WWF-Romania maintains its critical observations regarding the amendment of the Identification Methodology approved by Order No. 1,066/2026, the conduct of the public consultation, the risks associated with an application that is insufficiently grounded in science, and the need to develop a coherent, representative and functional network at national level.

The first Catalogue does not mean that the 10% target has been achieved. It means that Romania has the mechanism through which it can achieve it, provided that the designated PABs are properly implemented, the identification methodology is revised and strengthened, the methodology continues to be rigorously implemented through a transparent and participatory process and, very importantly, financial mechanisms are secured to compensate owners in order to continue the process.

2. Institutional significance of the first version of the PAB Catalogue

The operationalisation of PABs must be assessed separately from the assessment of whether the areas included in the first version are sufficient. Government Emergency

Ordinance No. 25/2026, the Identification Methodology and the National Catalogue together form the legal and operational architecture required for the designation, management and future expansion of the network.

WWF-Romania acknowledges the efforts of the Ministry of Environment, Waters and Forests and of the institutions involved in operationalising the mechanism under the milestone committed to through the National Recovery and Resilience Plan. Institutional practice shows that objectives set out in primary legislation may remain inapplicable for long periods in the absence of subsequent acts, procedures and instruments. From this perspective, missing the opportunity to establish the Catalogue would have created the risk of PABs remaining a formal objective, with no operational effects, for an indefinite period.

The adopted instruments must, however, be regarded as open to improvement. The experience of the first stage, the information resulting from the PAB forms and the analysis of GIS data must be used to clarify conservation regimes, remedy inconsistencies and substantiate subsequent designation stages.

3. Contribution of state forests and scale of the preliminary outcome

3.1. Agreement of the National Forest Administration, Romsilva

WWF-Romania appreciates the decision of the National Forest Administration, Romsilva, to express its agreement to include, from the first version of the PAB Catalogue, approximately 340,000 ha of the publicly owned state forest estate. This area exceeds 10% of all state forests and represents a direct, voluntary and substantial commitment by the public forest administrator.

As a result of inclusion in the Catalogue, more than one in ten hectares of publicly owned state forests managed by the National Forest Administration, Romsilva, is integrated into the network of protected areas dedicated primarily to biodiversity conservation. According to the assessment in the initial document, this commitment effectively doubles the area of state forests under a protection regime aimed at safeguarding biodiversity.

3.2. Share of forest ecosystems

1. Approximately 73% of the PAB area, estimated at around 0.6 million ha, consists of forests and other wooded land, totalling approximately 0.45 million ha, although these cover less than 35% of the national territory, or approximately 8.31 million ha.
2. Publicly owned state forests contribute approximately 0.34 million ha, accounting for around 55% of the total PAB area and over 70% of the wooded areas included in the Catalogue, although state forests cover less than 14% of Romania's territory, or approximately 3.1 million ha.

These data confirm the dominant role of forest ecosystems and, within this category, of state forests in the first version of the Catalogue. At the same time, the current focus on forests

requires the rigorous application, in the subsequent stages, of the principles of representativeness and proportionality among ecosystem types.

3.3. Comparison at European level

According to an immediate comparative analysis conducted across the European Union Member States for the biogeographical regions assessed, excluding the European boreal region, the area of approximately 340,000 ha represents one of the largest areas of state forest committed to date by a public forest administration as a contribution to the European target of 10% strict protection.

This comparison must be used with an explicit statement of its scope: it refers to the Member States and European biogeographical regions analysed and does not include Europe's boreal region. We will conduct a detailed analysis of the areas included in the Catalogue in the immediate period ahead.

4. Legal nature of PABs and their relationship with the European strict protection target

4.1. Overlap with existing protected natural areas (PNAs)

The overlap of a significant proportion of PABs with existing protected natural areas is compatible with the architecture of the EU Biodiversity Strategy for 2030. The 10% strict protection target forms part of the broader objective of protecting 30% of the terrestrial and marine area. Consequently, the fact that PAB areas lie within existing protected natural areas does not, in itself, diminish the relevance of the designation.

4.2. PABs do not constitute a new category of protected natural area

PABs do not, in themselves, constitute a new category of protected natural area. The Catalogue may include both areas within existing protected natural areas and areas outside them. The relevant legal and functional element is the establishment of the restrictions and conservation objectives provided for by the PAB framework for the natural values that justify the designation.

4.3. Content of the protection regime

For forests designated as PABs, the regime is generally compatible with the concept of 'strict protection' defined by the European Commission Guidelines that underpinned the process. Under the current legislative framework, interventions remain possible only when they are strictly necessary for the conservation or restoration of natural values as part of PAB management, or to eliminate causes and effects that may affect human safety, or to prevent and combat natural disasters. Interventions cannot be justified on economic grounds.

No silvicultural interventions should be possible in primary and old-growth forests. For other forest habitats, the compatibility of interventions with the PAB objective depends on their

case-specific justification by conservation needs and compliance with the conditions established for each area.

5. Active management in forest habitats

The application of active management may pose a risk to the ecological integrity and credibility of PAB implementation. Reference to active management must not be interpreted as a general authorisation to continue the management practices applied before designation and cannot serve as a basis for economically motivated interventions.

5.1. Conditions for application

3. Interventions must be carried out exclusively when they are necessary and thoroughly justified in light of the PAB conservation objectives.
4. The conditions and areas in which interventions may take place must be clearly and explicitly specified for each PAB.
5. Where distinct conservation regimes or measures are established within the same PAB, the corresponding areas must be clearly identified and delimited both on the ground and in the cartographic materials.
6. The need for interventions and the authorisation of forestry works must be subject to specific, transparent and verifiable procedures.

5.3. Monitoring

Monitoring of active management must demonstrate that any silvicultural interventions are strictly necessary to achieve specific biodiversity conservation objectives and that they do not represent the mere continuation of the management applied before designation. This distinction is all the more important because areas fulfilling multiple protection functions were prioritised in the designation process.

Thus, in the case of stands previously placed under a conservation regime to fulfil other special protection functions, for example, predominantly hydrological, soil-protection, climatic or social functions, designation as Priority Areas for Biodiversity must result in an effective change in management practices.

As their very name indicates, biodiversity conservation must be the priority objective in these areas, while active interventions must be exceptional and applied only when strictly necessary to maintain or improve the status of protected habitats or species.

Therefore, the most restrictive measures compatible with the established biodiversity conservation objectives must prevail, and permitted interventions must be clearly justified and specifically monitored, on the basis of clear and transparent procedures. Monitoring indicators must allow the effects on the natural values for which the area was designated to be assessed, rather than merely formally verifying that works have been carried out according to the type of work.

In the absence of a conservation need that justifies an intervention or its continuation, ecosystems must be left to evolve naturally, under conditions essentially undisturbed by

human activities. The immediate priority must therefore be the rigorous application of the protection regime in the PABs already designated, in the spirit of the legislation and the European Commission Guidelines.

5.2. Incorporation into forest management plans

For proper implementation, WWF-Romania recommends establishing a distinct functional category in forest management plans that reflects the special protection regime of PAB areas. The applicable forest regime must make it possible to identify the priority conservation objective unequivocally and distinguish it from production functions.

Furthermore, for the proper interpretation and application of 'active management' measures, we consider it necessary to adopt specific procedures that clearly establish the situations in which interventions are justified, the manner in which their necessity is substantiated, and the review and authorisation process for forestry works. The decision must be taken within an interinstitutional, participatory and transparent framework, involving, where appropriate, depending on the nature and justification of the intervention, the administrator of the protected natural area.

6. Continuity of WWF-Romania's position and assessment of the methodological framework

WWF-Romania has consistently supported the operationalisation of PABs, but has raised [critical observations regarding the amendment of the Identification Methodology](#) approved on 29 May 2026 by Order No. 1,066/2026, as well as earlier concerns regarding the [conduct of the public consultation process](#).

Acknowledging the value of establishing the first Catalogue and maintaining the methodological criticisms are not contradictory positions. The former concerns the existence of the legal and operational mechanism and the concrete contribution of the areas already committed. The latter concerns the robustness of the instrument used to continue the designation process and the risks we have identified and drawn attention to.

In the legislative context, WWF-Romania notes that the areas committed in the first version of the Catalogue correspond to the process initiated on the basis of the [Methodology that underpinned the public consultations](#) held between February 2025 and March 2026, as also recorded in the PAB Forms. This finding supports a positive assessment of the preliminary outcome, without automatically validating the use of the methodology in its current form for future designations.

Uncritical acceptance of the effects of the current methodology would mean accepting the risks identified by WWF: [undermining close-to-nature forestry practices specific to the national context](#), discouraging the adoption of voluntary conservation measures applied in forests with production and protection functions, affecting the credibility of the designation process, and reducing social acceptance, particularly among local communities.

7. Priority conditions for continuing designations in order to consolidate and develop a functional ecological network:

7.1. Completing the Catalogue with areas omitted from the initial inventory but meeting the conditions for designation as PABs

The Catalogue must be supplemented with:

- all nature reserves and natural monuments already assigned to functional category T I;
- all forests assigned, through the forest management plans in force and endorsed by CTAS, to functional categories 1.5J, virgin forests, and 1.5O, quasi-virgin forests, which are not entered in the National Catalogue of Virgin and Quasi-Virgin Forests;
- the 100 m protective buffer zones of UNESCO sites, in accordance with the official guidelines recognised by the Ministry of Environment, Waters and Forests.

The full inclusion of these areas is necessary both for an accurate assessment of Romania's contribution to the European biodiversity objectives and for the appropriate sizing of compensation mechanisms for owners.

In this respect, the Methodology for the identification and designation of PABs must also include appropriate provisions concerning procedures for the periodic updating of the National PAB Catalogue, including the correction of boundaries where material errors exist.

7.2. Revision of the methodology on a scientific basis

The Methodology must be revised to eliminate the identified risks and, not least, to restore the predictability, credibility and [social acceptance of the process](#). It must establish clear and well-founded technical parameters for prioritising areas proposed for strict protection, so that designation does not undermine close-to-nature forestry practices and does not discourage the voluntary application of conservation measures in forests whose primary function is production.

One easily understood example illustrates the seriousness of the problem: age over 100 years cannot be made a priority designation criterion when the age of technical exploitability for the main species is most often set by regulations at 110 to 180 years, with a minimum 30-year regeneration period added. Such a lack of correlation may create a perverse incentive, which could even be regarded as covert lobbying, to lower the age of exploitability, harvest forests earlier and legalise the harvesting of much larger quantities of timber. The consequences could be dramatic for the consolidation of [close-to-nature forestry in Romania](#), an objective equally promoted by the same EU Biodiversity Strategy ('Closer-to-nature forestry', Chapter 2.2.4).

Representativeness, proportionality and connectivity

The revised Methodology must ensure the development of a **coherent, representative and functional ecological network** at national level by properly applying the principles of **representativeness** and **proportionality** among ecosystem types and strengthening ecological **connectivity**. As shown above, the current version of the Catalogue indicates a disproportionate focus on forest ecosystems. The subsequent stages must increase the

representation of insufficiently covered ecosystems with high biodiversity value, including aquatic ecosystems, riparian areas and silvopastoral landscapes, and strengthen ecological connectivity.

We hope that the recent completion of the [Water Cadastre](#), which covers approximately 70% of the length of registered watercourses, over 55,000 km of watercourses out of a total of approximately 78,000 km, will facilitate the priority inclusion in the PAB Catalogue of aquatic ecosystems with high ecological value, [watercourses and adjacent wetlands, together with their protective buffer zones, consisting mainly of riparian forests](#). These play an essential role in regulating watercourses, maintaining water quality and ensuring longitudinal and lateral ecological connectivity. They also provide refuge areas for terrestrial species in landscapes dominated by intensive agricultural crops and can ensure the connectivity of the protected natural area network.

However, analysis of the current PAB Catalogue shows that these **green-blue corridors** are almost non-existent. Given that waters, banks and naturally established riparian forests already benefit from legal provisions establishing a differentiated protection regime under the Water Law, their designation for strict protection would strengthen the coherent and effective implementation of conservation measures on the ground. The Water Cadastre now provides the [spatial basis](#) required to identify and delimit them, creating an exceptional opportunity to supplement the PAB Catalogue with a functional and connected network of aquatic ecosystems, wetlands and riparian forests.

Another category poorly represented in the current PAB Catalogue is that of high-conservation-value [silvopastoral mosaic landscapes](#), or agroforestry landscapes, formed by alternating grasslands, shrublands and forests, together, where applicable, with wetlands and rocky or scree habitats. These 'cultural landscapes', shaped over time through traditional uses, support remarkable biodiversity, ensure ecological connectivity and provide essential habitats for numerous species. They must be identified and protected as unitary ecological systems, because managing them in a fragmented manner, by separate land-use categories, diminishes the very conservation value conferred by their mosaic character. Land abandonment and the disappearance of traditional pastoral practices are the main threats to these semi-natural landscapes. Therefore, completion of the PAB Catalogue must also prioritise representative landscapes in this category and ensure their conservation by continuing the traditional uses that created and maintained them.

7.4. Thorough identification and mapping

On the basis of the revised methodology, the identification and mapping of potential PABs must be substantiated by field assessments and must not be limited by the form of ownership or solely by the current availability of GIS data. Given that the current designation mainly included areas for which the National Forest Administration, Romsilva, expressed its agreement, the process must be extended nationwide on the basis of scientific and ecological criteria, while also taking into account the assessment of local socioeconomic impact. Ultimately, this concerns prioritisation for a 10% target.

7.5. Adequate public consultation

The results of the identification and mapping must be subject to adequate public consultation coordinated by the responsible authorities, with the participation of owners, administrators, local communities, the scientific community and interested organisations. The consultation must provide adequate and timely access to the relevant data and reasoned responses to the observations submitted.

7.6. Predictable financial mechanisms

Continuing the process requires predictable financial compensation mechanisms for owners, administrators and communities affected by restrictions imposed in the public interest. Without such a framework, extending the designations is practically unsustainable and risks increasing social opposition.

8. Financing the subsequent stages

The future Multiannual Financial Framework of the European Union, national funding programmes and the National Nature Restoration Plan must be used as opportunities to finance the continuation of the process and the integration of PABs into a functional ecological network based on conservation, restoration and connectivity.

Financial resources must cover not only compensation for landowners, but also a just transition for local communities traditionally involved in the use and processing of natural resources, ecological monitoring, strengthening administrative capacity and participation mechanisms. Financial allocations must be correlated with the intensity of restrictions and the local socioeconomic impact.

9. Conclusions and final position

WWF-Romania considers the first PAB Catalogue an important preliminary outcome and a genuine foundation for developing the network through 2030. The operationalisation of the mechanism and the commitment of approximately 340,000 ha of state forests must be recognised as concrete progress.

At the same time, the immediate priority is to strengthen implementation in the designated areas, clarify and control active management, complete the Catalogue with omitted areas, and revise the methodology before a new, extensive stage of identification and designation.

Only after the methodology has been revised, thorough identification and mapping have been carried out, stakeholders have been adequately consulted, and compensation mechanisms have been secured as a precondition can well-founded proposals for new potential PABs and the conditions for sustainable designation be discussed.

The first Catalogue is not the end point of the 10% target, but the legal and operational infrastructure that makes achieving it possible. The credibility and sustainability of the process will depend on the quality of the rules, their implementation on the ground, the
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scientific basis for expansion, and the capacity to secure appropriate resources and social acceptance.