



18.05.2020

**Attn: Prof. Dr. Pierre L. Ibisch** (Eberswalde University of Sustainable Development, Germany), **Dr. (Prof. a.D.) Hans D. Knapp** (European Beech Forest Network e.V., Germany), **Prof. Dr. Rainer Luick** (University of Rottenburg, Germany), **Dr. Francesco Maria Sabatini** (Martin-Luther University, Germany)

**Ref: Statement in response to the recently published report by the forest expert group at the Transylvanian University of Brasov** (dated May 8th, 2020)

Dear Sirs,

Thank you for the interest shown to our analysis of the PRIMOFARO report. We have read the statement you have recently submitted to us and other institutions.

***First of all***, we hope that the document is original and represents your views as reviewers and not of those who commissioned the report. We express this concern as we received an electronic but not-scanned document, where signatures were pasted-in and the author, according to the *Document Properties*, is another person who seems to be a campaigner for the NGO which published the PRIMOFARO report.

***Second***, regardless of authorship, we find that actually the statement reached the same conclusion as our analysis: that at this moment, **before being “scientifically verified”, the results of PRIMOFARO, as was published, cannot be used in decision making**. However, the fact that only after being “**scientifically verified**” these forests deserve protection (as mentioned in your statement) **is not mentioned** in the PRIMOFARO text. The text proposes direct and immediate measures (see *recommendations, page 78*) – **potential** old-growth and primary forests “***need to be protected comprehensively, applying a non-intervention approach and very extensive, close to nature forest management, only to serve immediate subsistence needs of local population***” and “**Potential old-growth and primary forests” identified by the report “on Romanian state property need to be turned into non-intervention zones. This needs to happen quickly, therefore a moratorium for logging of potential old-growth and primary forest on state property must be applied by the Romanian government.”** Obviously that is why the state authority has requested a comprehensive analysis of PRIMOFARO to see whether it is appropriate for decision making or not.





**Third**, as we consider that some of the statements in your letter are not reflecting the reality (probably due to an inaccurate translation of our analysis), we hereby provide more information and answers to the expressed concerns. Please find below our reply to these statements.

1) Talking about meeting “*the scientific standards*”, despite the fact that we did not underline this in our analysis (for the sake of academic respect), we express concerns that at present, taking into account the vast array of techniques and tools and also already existing research and experience on such topics, “*visual analyses*” as a method would provide solid and statistically grounded results in such a complex issue. Moreover, the high-resolution of the aerial images is helpful to reach good results only if provides enough detail for the scope. Actually many if not most of the errors we have identified in both the methodology and results of PRIMOFARO are linked to this issue.

2) The members of the Forestry Expertise Group of the Transilvania University of Brasov who participated in the analysis are not anonymous. Our letter to the ministry was signed by the representatives of the institutions which were asked to provide a point of view (university/faculty) – a normal and well accepted procedure in any official correspondence. The members of the group, as mentioned on the website, are “*specialists from the university's faculties, with rich national and international experience in various fields of sustainable forest management and conservation*”. In each particular case, depending on the topic and based on experience and availability, certain members of the faculties are involved in elaboration of official statements. For the sake of science and objectivity and also of freedom of speech/research, we believe that any analysis on such documents should be based on the information from the document itself and not on the people who wrote it. And, if during such analysis, objective and scientific evidence is found, the quality and conclusions of the document can be challenged. Therefore, we were expecting a scientific debate on the **errors** identified in the PRIMOFARO report by our analysis (**the base for the conclusion of our analysis**) not a statement being concerned with particular names and expertise involved in the analysis. Last but not least, we could not find a complete list of such authors on the PRIMOFARO report either. However, this did not impair our ability to carry out a thorough analysis of the report (as we analysed the report not the persons involved in it and our conclusions were on the report and not on its authors). Indeed, not knowing the authors ensures a more objective judgement and is one of the methods used in many cases in the world of science and scientific research publishing (the double-blind system implemented by many well-known international research journals) precisely for ensuring a balanced, correct and objective review process.

3) Regarding the so-called “controversial assertions” from your letter (rather caused by a poor translation of our analysis or misinterpretation of the text), we would like to mention the following:

- Our analysis states that all forests, including the primary and old growth forests are a result of the long term **forest management system** (and **NOT harvesting** system) implemented in our country. Such a system encompasses



different levels of protection (including strict protection) for various goals (covering biodiversity as well);

- We **did not** use in our analysis the term “commercial forests” and we mentioned that usual rotation periods/logging cycles in Romania are **over** 100 years (which, together with other restrictions, produces forests very similar to old-growth). We **did not** state that such commercial forests have equal ecological values to unmanaged forests. This is rather a conclusion which can be drawn from the PRIMOFARO report as the areas with potentially untouched forests (old-growth and primary) include many such actively managed forests. But we clearly underlined the very high importance of sustainably managed forests having close-to-natural structures;
- We **did** mention that 90% of Romanian forests, due to a particular and strictly regulated management, have **close to natural compositions and structures** (citing the results of the National Forest Inventory) and not necessarily that are “natural forests”. Yet, we **did not** state that all primary forests are already protected! We indeed mentioned that the process for mapping them is still ongoing, but we underlined that there is a clear legal framework for this process which guarantees strict protection even for those forest areas proposed (but not yet approved) to be included in the National Catalogue of virgin forests. This contradicts the opinions from the PRIMOFARO report, that ongoing calls for a logging moratorium of virgin forests have not led to any effective corresponding action by the Romanian government;
- We **did not** state that managed forests contribute more to biodiversity than old-growth untouched forests. We underlined **that the mosaic containing all development stages (including the old-growth but beside this, also the other stages acquired in managed forests) is much better for biodiversity at large scales**. This is a **well-known concept** not only mentioned in a vast array of scientific literature but also proven by the biodiversity spread across entire Romania and not only in old-growth and primary forests;
- Regarding climate mitigation (and not protection as mentioned in your letter) the article we have provided is only one example and was only to show that, as you also underline in your letter, the subject is “*far from being settled*”. Therefore, sharp statements on this subject (as those from PRIMOFARO report) should be avoided. Moreover, most of the quotes from the PRIMOFARO report on these issues come from a **single** article (i.e. Watson & Evans 2018) comparing intact forests with **degraded** forests and **not with sustainably managed** forests, thus rather creating confusion to the reader.

While these were either misinterpreted or are subjects (i.e. carbon sequestration, biodiversity) that are “*far from being settled*” and thus still debatable, the important and various types of errors detected in the PRIMOFARO methodology are less debatable as they are not only proved by existing scientific literature (some examples are cited in our analysis) but also by the empirical evidence provided by the imprecise results of the



study itself. The conclusions of our analysis are based on **the errors identified** in the PRIMOFARO methodology, in the results and also on **the lack of correspondence** with the conclusions and recommendations and not on “*controversial assertions*” on certain topics still under debate in the scientific community.

4) Regarding your statement according to which our analysis “*does not comply with the standards of good scientific practice*” as we did not “*proactively*” consulted “*the authors*” and we did not request “*access to the data underlying*” the report, we would like to mention the following:

- First, the practice of review in the world of scientific research is based on the analysis of documents produced by authors. Such documents should contain enough detail and information to allow a thorough analysis and replication. Therefore, good documents (in the final, published form) do not need “*proactively*” involvement of the authors for reading, understanding and therefore carrying an analysis.

- Second, it is true that we did conduct our analysis without having access to the original data. We acknowledged this from the beginning of our analysis, stating that **such information was not available**. We also mentioned **it was not available even for the state authority** which had asked our institution for the analysis (authority which, according to the authors of PRIMOFARO, should take immediate steps based on their report). Further, as mentioned in your statement, we were indeed contacted by one of the authors of the report and **we requested access to data** in GIS format to carry out our analysis, **but such data was not provided**. Therefore, we consider that **we did request** “*access to the data underlying*” the report and your statement is not accurate. However, if you as reviewers of the report would like to convince yourself on this matter, **we are ready to make public the email correspondence on this topic**.

5) As many if not most of the **errors** we have underlined **are linked to the methodology** (and not to the precise location of polygons), we consider that the lack of access to underlying data does not at all “*undermines the validity and scope*” of our conclusions as mentioned in your statement. We underline again that our main conclusion matches one of the conclusions of the PRIMOFARO report and also the conclusion from your statement – that **PRIMOFARO polygons are just potential and must be scientifically verified further**.

6) Regarding your opinion that our “*report leaves the unpleasant impression to reflect personal opinions and political interests rather than robust scientific principles*”, we consider it just a subjective impression of yours. In the scientific world (but not only there), the result of the analysis **must** represent the opinion of the authors (and not of others), but this does not mean the opinion is subjective. We consider **we have provided enough evidence to scientifically sustain our opinions and conclusions**. Moreover, these opinions are not only based on the scientific analysis of the methodology and results but also based on decades-long experience in forest management, policy and conservation **in the context of Romania** (something which seems to **completely lack in the case to the authors of the PRIMOFARO report**). In terms of “*political interests*”, as the conclusions and recommendations of PRIMOFARO

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are **completely disconnected** from its methodology and results (i.e. are not grounded at all in the results and do not take into account the errors affecting them), in our opinion **they look more like a political agenda** than real science. While this might be normal for NGOs like the one which commissioned the report, we consider it should be not for scientific researchers and universities.

7) We agree that *“only through high-quality analysis (with state-of-the-art data, including aerial and satellite images), sound statistical approaches and ground-based validation (field surveys) a proper survey (inventory) of Romanian primary forests can ever be accomplished”*. Indeed, based on these grounds, our analysis showed that **results of PRIMOFARO are not appropriate for making decisions at this stage (as they were released)**. However, it is not clear why you were expecting that our analysis must contribute to improving the inventory of Romanian primary forests. Although underlying the errors which affect the methodology and results is one step to improve the work, **our task was strictly to provide an analysis** (upon the state authority request) **on PRIMOFARO report** in the form it was published and not to improve its results (that remains the task of authors, if they are willing to, or to other future efforts on this topic).

8) **We agree** (regardless whether is a broad consensus or not) that very rare ecosystems such as primary forests, *“deserve comprehensive protection, regardless where they are located”*. However, **we cannot agree** with protection of actively managed forests misinterpreted as untouched and classified as primary and especially as old-growth.

9) Last but not least, **we agree** that *“the positions of stakeholders associated to forest industry and conservation remain extremely polarized, and more than ever reaching a consensus is needed”*, but consensus requires equitable involvement of the different stakeholders. This is another reason why PRIMOFARO **should not be implemented and used** for decision making without a thorough and critical analysis including also social and economic aspects as well. Moreover, the role of universities becomes even more important as they work across the entire spectrum, but universities do not represent exclusively neither one of the extremes. **Our analysis was not against conservation of valuable forests. It was pro conservation but on solid scientific and pragmatic grounds.**

Taking into account all those mentioned above, we believe this information should be helpful to you and all the other persons to whom you have sent your letter, for a correct assessment of our analysis of PRIMOFARO report provided to the Romanian Ministry of Environment, Waters and Forests. Moreover, as the errors we have detected in the report and mentioned in our analysis are not challenged by your statement, strengthens even more the **same overall conclusion** (of PRIMOFARO reviewers and also of our university) – **that the PRIMOFARO report cannot be used at this stage for any decision making** as it represents a very initial step towards identifying the primary and **true** old-growth forests in Romania.



We agree that “*the scientific world should devote its energies to inform open and transparent discussions about ways to more effectively identify and protect the ecologically mature forests of Romania and to foster sustainable and close to nature forestry able to reconcile human needs and biodiversity protection*”. We wish the authors of PRIMOFARO would have thought of this at the beginning of their study. The great experience on local forest management, policy and conservation available in research, education and forest administration entities in Romania, would certainly help avoid many errors and erroneous interpretations and therefore would ensure much better results. We are open to discuss further the results and methodology used in PRIMOFARO report, especially if you find that its errors mentioned by our analysis are not affecting the outcome of the report.

Sincerely yours,



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Rector  
Transilvania University of Braşov

Prof. Dr. Alexandru Lucian Curtu  
Dean  
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This letter is sent as copy to:

- Mr. Klaus Iohannis, President of Romania
- Mr. Costel Alexe, Minister of the Environment, Waters and Forests Romania
- Mr. Daniel Calleja Crespo, Director-General European Commission
- Mr. Humberto Delgado Rosa, Director DG Environment; European Commission
- Mr. Virginijus Sinkevičius, Commissioner to the European Union
- Mr. Michal Wietzik, Member European Parliament
- Mr. Nicolae Ştefănuţă, Member European Parliament
- Mr. Martin Hojsík, Member European Parliament
- Mr. Martin Häusling, Member European Parliament
- Mr. Luc Bas, Director European Regional Office, IUCN
- Mr. Gabriel Schwaderer, Executive Director EuroNatur Foundation
- Mr. Gabriel Paun, President Agent Green