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8 May 2020

Statement in response to the recently published report by the forest expert group at the Transylvanian University of Brasov

Dear Prof. Dr. Abrudan, dear Prof. Dr. Curtu,

In the role of scientific reviewers of the PRIMOFARO study commissioned by EuroNatur Foundation and published in 2019, we make the following statement in response to the recently published report by the forest expert group at the Transylvanian University of Brasov (Grupul de Expertiză Forestieră din cadrul Universităţii Transilvania din Braşov - TUB forest expert group hereafter).

On March 17, 2020, the State Secretary of the Romanian Ministry of Environment approached the Transylvanian University Brasov (as well as Stefan cel Mare University Suceava and INCDS “Marin Dracea”) and requested an informed opinion on the ‘PRIMOFARO study’.

It is known and recognized that Romania hosts some of the largest remaining tracts of intact forests in the European Union but information on their current extent is still incomplete. The PRIMOFARO study aimed at contributing to a faster progress on the identification and protection of these. It is based upon visual analyses of high-resolution aerial images, and concludes that Romania still hosts a substantial cover - over 500,000 hectares or around 8% of Romania’s forests - of potential primary and old growth forests. PRIMOFARO provides a detailed digital map, mentions explicitly that the marked / addressed areas / polygons should be considered as perimeters with a high potential of containing such forests, and calls for further validation and verification of these polygons. It argues that these forests, if scientifically verified, deserve protection under current Romanian and EU legislation.

On April 6, 2020, the Rector and the Dean of Brasov University issued an extended report (54 p.) to the Romanian Ministry of Environment, Waters & Forests, authored by the TUB

forest expert group, to serve as an analysis of the PRIMOFARO study. This report moves strong critics to PRIMOFARO. While constructive criticism is paramount for the progress of scientific knowledge, we raise the concern that this report may not meet the scientific standards.

We note here three pivotal aspects of the conclusions provided by the TUB forest expert group as examples:

First, it is remarkable that, against common scientific practice, the authors of this report remain anonymous, nor is it possible to trace the names and field of expertise of the members of TUB forest expert group. This seriously undermines the scientific legitimation of this board. According to accessible information this group has only recently been established by the “Decision of the Board of Directors no. 73 of February 25, 2020”. But no information is provided about the nomination process of members of this board.

Second, the report includes controversial assertions, which either go against common scientific knowledge or overlook the significant uncertainties still existing. For instance, the report claims:

- (1) that Romania’s primary and old growth forests are a product of the long term forest harvesting system implemented in the country;
- (2) that Romania’s commercial forests with logging cycles of 100 years have equal ecological values to unmanaged forests, whose life cycle could last up to 600 years;
- (3) that 90% of Romanian forest cover qualifies as „natural forests“ and that all primary forests are already protected, even if the process for mapping them is still ongoing, and
- (4) that managed forests contribute more to biodiversity and climate protection than old growth forests.

The latter conclusion draws mainly on the publications from one main author E.-D Schulze¹. In the work of Schulze and co-authors, virgin and old growth forests are shown to have a 10 times smaller rate of carbon fixation. This publication is in line with other work of the same author² where he concludes that virgin and old-growth forests have a much lower biodiversity as compared with intensive managed forest. These publications however represent only one side of the debate, which is far from being settled³. Furthermore, carbon is only one of the aspects to take into account when developing sustainable forest management strategies. Considering all the developmental cycles of a forest, there is compelling evidence that the biodiversity of virgin and old growth forests is unique, outstanding and usually much higher as compared with managed forests of same character.

Third, it does not comply with the standards of good scientific practice that an expert group commissioned to analyze a scientific study neither proactively consults the authors of that

¹ SCHULZE, E.D., et al. (2020): The climate change mitigation effect of bioenergy from sustainably managed forests in Central Europe.- GCB Bioenergy 2020 (12):186–197.

² SCHULZE E.D., et al. (2014): Opinion Paper: Forest management and biodiversity.- Web Ecol.14: 3-10.

³ SCHULZE, E.D., et al. (2012) Large-scale bioenergy from additional harvest of forest biomass is neither sustainable nor greenhouse gas neutral. Global Change Biology Bioenergy, 4, 611-616.

study, nor requests access to the data underlying it. Rather, the expert group limited their assessments to a set of low-resolution graphical images reported in the published PRIMOFARO report to „discredit” the study as a whole. This clearly undermines the validity and scope of their conclusions. Furthermore, the report leaves the unpleasant impression to reflect personal opinions and political interests rather than robust scientific principles.

As all remote sensing analyses, the PRIMOFARO study has its limitations and errors, which were openly and self-critically discussed in the study itself. Surely, there is the need to progress further. 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. Unfortunately, the report by the TUB forest expert group contributes little on these regards.

The authors of the PRIMOFARO-study had sent an invitation for communication to the Dean of the Forest Faculty of the Transylvanian University of Brasov. Unfortunately, this offer remained unanswered. Being unable to set up communication with the University or the TUB forest expert group we decided to write this open letter.

On the occasion of this letter we would like to emphasize that there is a broad consensus amongst scientists that old growth and primary forests deserve comprehensive protection, regardless where they are located⁴. The accelerating and interacting climate and nature crises urge for bold and rapid action in this field. More than ever, 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. This debate requires the contribution of all scientists and respected scientific institutions, such as the Transylvanian University of Brasov. We all bear a great responsibility on these regards.

We are therefore troubled to see ideological and non-factual rhetoric put forward with the TUB forest expert group report. We are afraid that the Transylvanian University of Brasov might not be defending its independence against third-party interests with the needed vigor. We are also worried that the international reputation of such a renowned Institution might be harmed from this misstep, and that this may have negative consequences on the effort to unravel the entrenched conflict surrounding the delicate issue of primary and old-growth forest protection. Herewith we invite the University leadership to renew their effort to foster

⁴ IUCN proposed resolution: <https://www.iucncongress2020.org/motion/125/58738>

WATSON, J.E.M., EVANS, T., VENTER, O., WILLIAMS, B., TULLOCH, A., STEWART, C., THOMPSON, I., RAY, J.C., MURRAY, K. & SALAZAR, A. (2018) The exceptional value of intact forest ecosystems. *Nature Ecology & Evolution*, DOI: 10.1038/s41559-018-0490-x .

MACKEY, B., DELLASALA, D.A., KORMOS, C., LINDENMAYER, D., KUMPEL, N., ZIMMERMAN, B., HUGH, S., YOUNG, V., FOLEY, S., ARSENIS, K. & WATSON, J.E.M. (2015) Policy Options for the World's Primary Forests in Multilateral Environmental Agreements. *Conservation Letters*, 8: 139-147.

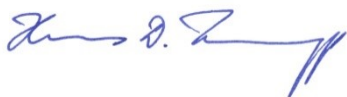
an open, evidence-based debate on the issue, and rethink its communication strategy based on the work of an expert group whose members are anonymous.

The positions of stakeholders associated to forest industry and conservation remain extremely polarized, and more than ever reaching a consensus is needed. We believe science must play a key role in unraveling this conflict. By providing reliable and sound information, scientists can inform policy makers and the public alike on the possible consequences of setting alternative goals and priorities. A transparent and fair debate on scientific findings and their interpretations is vital on these regards. These requires the full awareness of all members of the scientific community on the need to keep the different levels of the debate clearly separated – the task to provide sustainable resource and the obligation to care for biodiversity and ecosystem functioning.

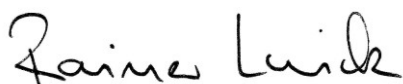
Yours sincerely,



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Dr. Hans D. Knapp, Dir. u. Prof. a.D. (former Head of the International Academy for Nature Conservation Isle of Vilm) / European Beech Forest Network e.V.



Prof. Dr. Rainer Luick, University of Rottenburg, Head of Dep of Landscape Management, Schadenweilerhof, D-72108 Rottenburg, Germany



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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 Ștefănuță, 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