

## **ANNEX 1 – complaint case number 4530**

### **Analysis of Allegations in Complaint against Ingka Investments Management SRL, Certification code: SA-FM/COC-005243**

Date received: 17 June 2021

#### **Summary of complaint:**

*Complaint raised issues relating to compliance with NFSS for Romania relating to several irregularities in the application of forestry treatments in UP III Valea Neagra-Motnau, in the forest of Valea Neagră (ua. 121a, b, c) and the forest of Dălhăuți 1 (ua 801c). One of the most worrying findings was clear cuts applied instead of progressive cuts (natural regeneration is almost completely missing). Both in the current forest arrangement plan and in the Sumal application, only progressive cuts were authorised in these plots, but we found clear cuts instead.*

Details of each point raised in the complaint and it's assessment are listed in the table below, which represents the report elaborated after the field visit and the documentation check in the office.

#### **Assessment of complaint**

The assessment of the issues raised in the complaint was carried out during 13 and 14<sup>th</sup> of July 2021.

Assessment team: 1) Audit Team Leader, MSc in Forestry, with over 30 years' experience in forest management assessment and certification, forestry business planning, biodiversity conservation and monitoring, resource evaluation, legislation, strategy and action planning and implementation and a Soil Association auditor since 2004 and 2) Auditor with 10 years of experience in forest management certification, MBA in environmental protection and quality certification ISO 9001, 14001, MSc in Conservation and Management of Natural Resources. Experience in environmental values monitoring and GIS.

#### **13.07.2021:**

- Opening meeting with participation of representatives from INGKA staff audit;
- Inspection of documents, records, including forest management plans, logging areas files etc. at the office
- Field visit in UP III, forest sub-compartment (u.a.) 801C - Dălhăuți 1

The audit team was accompanied by the complainant representatives during the day.

14.07.2021:

- field visit in UP III u.a. 121A, B and C
- Inspection of documents, records, including forest management plans, logging areas files, stakeholder consultation records; correspondence with governmental agencies; records of inspections carried out by state agencies; monitoring records etc. at the office
- Interviews with stakeholders

On 14.07.2021, the audit team was accompanied by the complainant representatives only during the sites visit.

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<b>1</b>	<b>UP III Valea Neagra-Motnau, Valea Neagră (ua. 121a, b):</b>			
a	Clearcut conducted where group shelterwood cuts " <i>taieri progresive</i> " are listed in the management plan and SUMAL application	1.3.1	The land entered into Ingka Investments Forest Assets SRL ownership in 2015 and is managed as business by Ingka Investments Management SRL. Forest management is carried out through Ocolul Silvic Ingka Investments SRL (OS Ingka). At the time of purchasing, the FMP valid for 2010-2019 was valid. The FMP requires implementation of group shelterwood - final cut). The managers decision was to support natural regeneration in 2016-2017 by sowing acorn and by removing some individuals of the existing high	- Evidence found during the audit at the office and in the field could not confirm breaches of the requirements

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			<p>regeneration of species which were not part of target composition, to favour the installation oak seedlings. In 2019, according to the 2<sup>nd</sup> section of FMP, in 121A, there was implemented sanitary felling on 2.4 ha, being extracted 6 m3 of beech and other species.</p> <p>The final cut was carried out in 2020, as per provisions in the new forest management plan issued for the period of 2020-2029.</p>	
b	Poor natural regeneration in the logging area	1.3.1	<p>The Technical Norms (7) Ord MAPP 1653/31.10.2000 stipulates the methodology of regeneration evaluation. Based on this methodology, there is an annual internal decision issued by the FMU Manager for evaluation the regeneration status. Decision 41/2.09.2020 – stipulates that field evaluation and data collection will be carried out between 2.09.2020 – 15.10.2020 by the responsible employee). Following this step, the field checklist is filled out, establishing the percentage of regeneration and the installed composition by species. For 121A and 121B, field checklist seen and in both the percentage of installed regeneration is over 70%: 121A – 70% and 121B – 72%.</p> <p>Following the complaint, OS INGKA employees established a new network of sample areas to assess the natural regeneration remained after the cut. According to the data collected the natural regeneration coverage shown that existing regeneration after the final cut is over 70% (over 80% in some cases).</p> <p>As part of the complaint assessment, during the site visit several sample plots were verified sub-compartments 121A and 121B (six in each forest sub-compartment). The sampling confirmed that the existing natural regeneration of target composition species cover more than 70% of the land.</p>	<p>The natural regeneration is in place and corresponds to FMP targets; however, the removal of almost entire high regeneration (1-2 m height) of not wanted species - mostly Carpinus, which is a strong competitor for Quercus – resulted in a visual impact; retaining part of the existing high regeneration could provide some protection of Quercus seedlings during strong heat periods in the summertime.</p> <p><b>See Obs 2021.4</b></p>

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			<p>Most of the high natural regeneration (1-2m) of species which do not belong to the target regeneration formula (as provided in the FMPs) was removed in order to ensure conditions for regeneration of targeted species. The young seedlings of Quercus spp., Acer spp, Fraxinus spp., Fagus, Carpinus was retained in various proportions. After the operations implementation, the current composition of the regeneration is:</p> <p>121A – 6 Oak+2 Beech+ 2 Other species. According to the FMP, the target composition for this forest subcompartment is 5 Oak+3 Beech+ 2 Other species (corresponds)</p> <p>121B – 6 Oak+2 Beech+ 2 Other species. According to the FMP, the target composition for this forest subcompartment is 5 Oak+3 Beech+ 2 Other species (corresponds)</p> <p>The current species composition corresponds to the FMP provisions and the targeted composition of the future mature stand.</p>	
c	<p>Deep tractor routes, not reinstated after the end of the operation, which increase the danger of torrential erosion, collecting rainwater</p> <p>There are already areas with phenomena of erosion and soil degradation, which will be</p>	10.10.2	<p><i>Disturbance or damages to water courses*, water bodies*, soils, rare and threatened species*, habitats*, ecosystems* and landscape values* are prevented, mitigated and repaired in a timely manner*, and management activities modified to prevent further damage.</i></p> <p>Both harvesting sites mentioned in the complaint (121A and 121B) are neighboring the forest sub-compartment 121H registered as HCV 4.2a. however no HCV identified in the mentioned harvesting areas. During the evaluation of harvesting sites through Annex 20 (Anexa APV) there was wrongly mentioned that the 121A is under the area covered with HCV 4.2a and mitigation measures have been established. After</p>	<ul style="list-style-type: none"> <li>- the Organisation has taken measures to monitor and mitigate the erosion impacts along the tractor routes</li> <li>- The tracks had been levelled however due to excessive rainfall some erosion had occurred</li> <li>- the effect of climate change is likely to be more frequent sever rainfall events so this should be considered</li> </ul>

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	accentuated in the absence of trees		<p>harvesting site authorization, the hand-over document for starting the logging activities, is correcting the information, by excluding the mitigation measures, remaining valid the legal requirements for extraction of the timber and the company internal procedures. Documents inspected: Annex 20 (Annex EIA – APV) filled by chief of district Paul Dima on 24.06.2020; Annex 4 no. 4375/12.10.2020 - Hand-over document for starting the logging activities and Annex 12 EIA completing the Annex 4.</p> <p>Through Annex 13 Harvesting site inspection, carried out first on 28.10.2020, condition of soil, H&amp;S, presence and status of RTE, marginals habitats, HCVs are checked. According to the document Annex 13 no. 4583/28.10.2020 there were no breaches observed by the chief of district. The process is followed by a second harvesting site inspection, once the activities are finalized and the site is ready to be returned to the FMU. The checks are carried out according to Annex 28 to Handing-back document no. 5361/11.12.2020 showed that there were no breaches identified in relation with legal provisions, technical norms, EIA.</p> <p>In the FMP the sub-compartments 121A and 121B are included in the category 1-2L described as forest stands located on soil types highly vulnerable to erosion and landslides and with inclination of over 30 degrees and the type of felling to be implemented is included in category T IV (operations allowed, with certain restrictions).</p> <p>Field visit: The timber was extracted using skidders. The existing extraction routes were specified in the harvest documentation and on logging area sketch. No new extraction route was built; only existing extraction routes allowed.</p>	<p>during planning for activities in vulnerable areas.</p> <p>- <b>See Obs 2021.4: under 10.9.3</b></p>

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			There was evidence that the extraction routes were leveled at the end of the works. However, because of abundant rains the soil that filled the skidder wheel tracks started to be removed. The processes are under monitoring by the foresters and actions taken e.g. to prevent further removal of soil and deeper erosion, foresters built up small transverse fences, with purpose to retain the soil.	
d	The impact on the local community can be devastating because plot 121a is less than 250 m above the village of Târâtu and potential future landslides can reach the village or block the safe communal access road (less than 100 m from the plot). Deep erosion can already be seen in the field, which amplify the destructive force of the torrent.	8.2.1 10.9.1	<p><i>The environmental impacts of management activities are monitored* consistent with Annex L.</i></p> <p><i>Potential negative impacts of natural hazards* on infrastructure*, forest* resources and communities in the Management Unit* are assessed.</i></p> <p><i>NOTE: for this standard, natural disturbances include windthrow, wind and/or snow breakage, forest fires, river high floods and/or overflows, insect outbreaks etc. Evaluation will cover in each case the disturbances most common in the past within the Management Unit</i></p> <p>The village Taratu is located in lateral to the logging area. According to the measurements in the GIS system, the distance from the village to the u.a. 121A, in the closest point (first household), is of approx. 283m.</p> <p>Between the village and the logging area there is a hillside; the logging area could not be seen from the village. Timber was collected downhill, During the site visit, it could not be seen any impact on the village. During the discussions on site, the complainant expressed that the logging could impact the road to the village which is downhill. Damages were not seen during the site visit. Interview with local stakeholder did not reveal issues or concerns related to harvesting impact.</p>	- Evidence found during the audit at the office and in the field could not confirm breaches of the requirements

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e	Almost complete removal of the soil layer indicating that some trees have been removed with a crown from the plot	1.3.1	<p>The harvesting technology described in the logging authorisations is by extracting the timber in “assortments and multiples of assortments”. Reports produced by the foresters who inspected the logging area did not state breaches in this regard.</p> <p>At the time of the site visit, there was regeneration on site, of both target composition species and others. From the evidence seen at site it could not be confirmed that trees were harvested with crown.</p>	- Evidence found during the audit at the office and in the field could not confirm breaches of the requirements
f	Older cuttings, cut close to ground level, without any visible marks, where there is a suspicion that the trees were illegally extracted before the final cutting	1.3.1	<p>According to Technical Norms (4) MAPPM no. 1651/31.10.2000, under chapter 3 Marcarea si masurarea arborilor destinati exploatarii, sub-chapter 3.1 – Marcarea arborilor, clearly specifies the exception from mark application, which is required to be done with round hammermark in all type of fellings (main cuts, secondary cuts, salvage and sanitary fellings), less in few cases, as following:</p> <ul style="list-style-type: none"> <li>- Forest stands where clearcuts are implemented</li> <li>- Forest stands where final cuts are implemented</li> <li>- Forest stands where cleanings are carried out, for trees with diameter below 8 cm.</li> </ul> <p>There were carried out 4 general inspections of forest area in 2020 (Control de fond) covered by Canton 7 (from which 121 A, B, C are part of) and no issues related to illegal logging were identified. These inspections were carried out as following: Control de fond no. 983/16.03.2020, CF no. 3332/11.08.2020, CF no. 3486/24.08.2020 and CF no. 4931/20.11.2020</p> <p>Field visit: several stumps cut at the ground level were seen – some of them from the past years (including before Ingka Investments Forest Assets SRL entered into possession of the forestland, in 2016) and from the last year. The foresters expressed they could not explain the origin</p>	- Evidence found during the audit at the office and in the field could not confirm breaches of the requirements

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			<p>of the old stumps cut to the ground (which occurred before they took possession of the land). According to the foresters, the recent stumps resulted from trees which were inventoried for felling, by measuring and recording them in the standing tree inventory report issued before the logging area was approved for felling. <b>This operation was the final cut thus according to the law it is not necessary to mark the trees for extraction as all trees will be removed.</b> According to the internal procedures, only the trees for retention will be painted with “M” letter. During the works, because one stump was in the log storage place (<i>platforma primara</i>) and the other on the skidder route, they were hampering the logs extraction by skidder, thus they were cut at the ground level.</p>	
g	Very large area left covered with debris (over 25%)	1.3.1	<p>According to the regulations, in regeneration cuts, the wastes (small branches, treetops, rotten tree parts etc.) shall be gathered in piles or rows (“<i>martoane</i>”), which should not cover more than 10% of the logging area. During the site visit it was seen that branches were gathered in piles. Some of the wood wastes (branches, tops) piles were loose, thus the branches are covering a slightly larger area than normal built piles. But there was no evidence of excessive debris coverage</p>	- Evidence found during the audit at the office and in the field could not confirm breaches of the requirements
h	Traces of leaks of fuel and lubricants from machinery.	10.12.3	<p><i>Prevention measures are implemented to avoid oil and/or gas spillage due to management activities. If such spills occur, measures will be implemented to repair the damage.</i></p> <p>After each harvesting operation is finalized, the forestry field staff (chief of district), through implementation of Annex 28, paragraph 10 of Handing back Protocol, among other aspects, is checking if any accidental leaks of fuel, lubricants or any other chemicals have been</p>	- Evidence found during the audit at the office and in the field could not confirm breaches of the requirements



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			<p>registered on the harvesting site. If such cases are identified, measures to repair the issue are required by the chief of district and the harvesting site is not accepted back until the measures have been implemented and the issue solved, rechecked again according to paragraph 11 of the same Annex.</p> <p>No leaks of fuel/lubricants were seen during the site visit</p>	
i	Non-compliant stumps in the sense that most do not have a threshold and a hinge	2.3.1	<p>Same as above. The stumps geometry is checked during the inspection of the harvesting site and results listed in the Annex 28, paragraph 4 – requesting that the technical norms for cutting have been respected. During the site visit it was seen that stumps' geometry was generally correct but there were several cases where the hinge was missing, or the back cut was almost at the same level with the notch.</p>	<p>- Managers shall ensure that Health and safety practices are developed and implemented that meet or exceed the ILO Code of Practice on Safety and Health in Forestry Works</p> <p><i>See <b>Minor CAR 2021.3</b></i></p>
j	Non-compliance with the "dead wood" measures / aging islands	10.11.3	<p><i>After harvesting, sufficient amounts of dead wood are retained to conserve environmental values* (recommendations on dead wood - Annex K).</i></p> <p>As per Annex K of the National Forestry Stewardship Standard, amongst the relevant requirements related dead wood are either:</p> <ul style="list-style-type: none"> <li>- Retaining ageing islands of trees (up to 0,1-0,2 ha) – around trees with active nest, marginal habitats or areas where extraction is difficult (priority choice where feasible);</li> <li>- a number of 1-3 dead standing or fallen trees or special trees shall be retained per each hectare</li> </ul> <p>According to the INGKA procedures, selection of the trees for retention is made at the time of the marking the trees for felling.</p> <p>As a result of the tree marking the foresters produce:</p>	<p>- Although the minimum requirements for retaining ageing islands and standing/fallen dead wood were met, the trees for retention were not specified in the logging area file (Annex 20) as per procedures specified in the INGKA FM manual.</p> <p><i>See <b>OBS 2021.2</b></i></p>

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			<ul style="list-style-type: none"> <li>- an estimation of standing timber marked for felling – “APV”. The APV shows the number of trees marked, per species, with volume per assortments, as well as general info on the logging area. Also shows how many “rotten trees” were present on site i.e.: 15 in 121A and 6 in 121B</li> <li>- A report on the marking process, which includes the environmental and social impact assessment (EIA and SIA) carried out at the time of tree marking, including recommendation for how many dead/biodiversity trees shall be retained (Annex 20 to the INGKA FM Manual).</li> </ul> <p>As provided in the logging area file for forest sub-compartment 121A, assessment of site and timber to be extracted was carried out 23.06.2020. Technological plan (“schita parchetului”) and the EIA/SIA carried out on 24.06.2020. <b>The EIA reports (Annex 20) state 1 biodiversity tree (dead wood) to be retained in 121A, while in 121B, no biodiversity trees was specified for retention.</b></p> <p>Situation in the field:</p> <ul style="list-style-type: none"> <li>- 121A (2.6 ha – resulting in minimum 3 to 8 trees to be retained): one standing biodiversity trees and several fallen dead trees seen;</li> <li>- 121B (1.8 ha resulting in minimum 2 to 6 trees to be retained): a group of young trees unmarked and uncut was kept in the upper part of the sub-compartment and an old standing oak has been preserved for biodiversity in the field</li> </ul>	
k	Failure to comply with the measures provided for biodiversity trees, only one tree was left standing, although this	6.4.3 10.11.3	<i>6.4.3 Potential impacts of management activities on rare and threatened species* and their conservation* status and habitats* are identified according to the procedure mentioned at 6.2.1. and management activities are modified to avoid negative impacts.</i>	- Evidence found during the audit at the office and in the field could not confirm breaches of the requirements

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	subplot we have many secular trees with traces of <i>Cerambyx</i> and other protected species		<p>1. <i>There are procedures to identify impact on rare and threatened species and their habitat</i></p> <p>2. <i>Proportional to the scale and intensity of the management activities, identification of rare and threatened species and their habitat has included consultation of relevant interested stakeholders and engagement of experts</i></p> <p>3. <i>Where potential impact was identified, measures to prevent this impact are established.</i></p> <p>4. <i>There is evidence that prevention measures are implemented and management activities modified when necessary.</i></p> <p>During the field visit galleries of <i>Cerambyx cerdo</i> were seen on several stumps. According to Environmental Assessment Study, developed by the company and verified by Environmental Protection Agency, a significant population of <i>Cerambyx cerdo</i> was not identified in any of the sub-compartments mentioned in the complaint. Indeed, the specie was identified in other sub-compartments where no activities have been carried out or planned to be carried out. According also to this study, “the population of <i>Cerambyx</i> is not going to be significantly impacted, considering that within the area of ROSCI0142 – “Padurea Dalhauti” the FMP does not provide for any harvesting operations, therefore no old trees, affected or partially dried will be extracted. Also, no pesticides are going to be applied in the forests of this area.” The research was carried out by SC OMNI SRL and report sent to Environmental protection Agency for verification and recommendations (9 recommendation have been received and included in the report. Document checked and registered with no. 11444/7.01.2021).</p>	

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I	<p>Non-compliance with the measures ordered regarding the protection of the biodiversity of the protected natural area ROSPA0141 Vrancea Subcarpathians</p> <p>Lacking in integration of the minimum conservation measures for ROSPA0141 Vrancea Subcarpathians in the current amenajament which is not even approved by order of the Minister and has not obtained the environmental permit</p>	7.2.1 1.3.1	<p><i>The management plan* addresses the elements listed in Annex H, and is implemented.</i></p> <p>The following steps were taken in order to obtain approval for the FMPs:</p> <p>The First Conference meeting (where the ToR are discussed, together with the stakeholders) took place on 12.04.20219</p> <p>The Second Conference Meeting (where the technical solutions of the FMP are discussed with stakeholders) took place on 29.01.2020.</p> <p>On 06.04.2020 OS Ingka sent the documentation to Environmental Protection Agency (EPA) requestion Environmental Endorsement. At EPA request, a working panel was established and OS Ingka hired experts for producing the required assessments (as per SEA directive). Endorsement of the Technical Committee for Endorsement in Forestry was obtained on 16.07.2020.</p> <p>During the process several public consultations were carried out. Public notifications were posted in national and local newspapers, on the OS INGKA website and on the EPA website.</p> <p>The FMP provides information and conditions related to the protected areas within UP III i.e.:</p> <ul style="list-style-type: none"> <li>- ROSCI0026 “Padurea Cenaru”, 308.3 ha and ROSCI0142 “Padurea Dalhauti”, 103.9 ha - both strictly protected from any operations;</li> <li>- ROSPA0141 – “Subcarpații Vrancei” 803.9 ha – classified as Group I -functional category 5R– having certain restrictions in implementing the forest operations</li> <li>- ROSPA0075 – “Măgura Odobești” 53,5 ha -- classified as Group I - functional category 5R – having certain restrictions in implementing the forest operations</li> </ul>	Evidence found during the audit at the office and in the field could not confirm breaches of the requirements

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			<p>Section 8 of the FMP “Protection of forestland, conservation and enhancing of biodiversity” is providing outlines of the biodiversity aspects.</p> <p>The Environmental Endorsement necessary for approval of the Forest Management Plan is available at the office, with registration no. 2/11.06.2021. This permit was sent over to the Ministry of Environment, Waters and Forest with letter no. 2651/29.06.2021 together with the FMP and CTAS Permit no. 146/16.07.2020 requesting the issuing of the Ministry Order.</p> <p>The process is followed according to the legislation and at the time of SA Cert Complaint investigation, the company is waiting for the Minister’s Order for the FMP.</p> <p>Interviews with the public authorities’ representatives confirmed that legal requirements are respected.</p>	
2	UP III Valea Neagra-Motnau, Valea Neagră (ua. 121 c)			
a	<p>Logging continues outside the approved period, after 30.04.2021</p> <p>Nu se poate confirma</p>	1.3.1	<p><i>All activities undertaken in the Management Unit*, including harvesting of products and/or offering ecosystem services are carried out in compliance with applicable laws* and regulations and administrative requirements. Any cases of trespassing are penalized according to internal procedures and legal provisions.</i></p> <p>The logging period is stated in the forestry legislation – Order 1540/2011 updated.</p> <p>The logging area was authorised with number A210012530029 from 23.03.2021. The logging period stipulated in the authorisation is: from</p>	Evidence found during the audit at the office and in the field could not confirm breaches of the requirements

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			<p>24.03.2021 to 15.04.2021 and from 15.09.2021 to 30.11.2021 (the period from 16 April to 14 September the forest operations are halted - summer restrictions during the vegetation period).</p> <p>At the time of the audit there were no works on site. According to the logging area documentation, on 15.04.2021, the Chief ranger (Sef District) carried out an inspection on site, issuing a report (“Nota de Constatatare”) describing the status of the operations and specifying that “further harvesting of the timber, as well as gathering of the harvest wastes (branches, tops) will be resumed on 15.09.2021; by that date, the logging area is under restrictions.</p>	
b	Freshly cut trees (with green leaves), stored in the forest, with the branches still attached	10.11.2	<p><i>Harvesting practices optimize the use of merchantable timber by reducing waste (harvesting debris, stumps height, abandoned timber etc.)</i></p> <p>The logging area locate in the UP III Motnau, u.a 121C has been registered in the national database (SUMAL) with number 2100125302600. According to the forest management plan issued 2020, the type of operation planned in this forest subcompartment is group shelterwood, second cut / final cut (depending on the status of the forest regeneration within the forest sub-compartment, the type of cut may vary). The total volume of the logging area is 159.77 m3, out of which beech and hornbeam 144.68 m3. OS INGKA decided to sell the timber resulted from the logging area to the local community. The system is that OS INGKA is felling the trees, cutting them into assortments, with the local people transporting the timber. According to the forest regulations, the logging operations are halted during the vegetation season, thus the authorisation (No A210012530029 from 23.03.2021), was issued for the period of 24.03-15.04.2021 and 15.09-30.10.2021. -15.04.2021 and 15.09-30.10.2021.</p>	Evidence found during the audit at the office and in the field could not confirm breaches of the requirements

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			<p>On 15.04.2021, the Chief ranger (sef district) inspected the logging area and issued a report (“Act de constatare”) which describe the status of the logging area and the progress of the works. It was stated that, at the time of the inspection:</p> <ul style="list-style-type: none"> <li>- approx. 10 m3 of timber is felled but not yet extracted.</li> <li>- the logging area was not cleaned up of timber wastes (branches); this would be done starting 15 of September, when the works will resume;</li> <li>- there is one hanged tree which shall be removed, in presence of the forest guard, in the next period of time.</li> </ul> <p>At the time of the field visit to assess the complaint, there was no activity on site. Some felled trees and part of trees were seen on site; according to the records inspected and to the interviewed foresters, the timber will be removed after 15.09.2021 (when the restrictions end and works will resume).</p>	
c	Thorned trees: cut at the base and leave on the leg, without being felled, an imminent danger of causing injury, as can be seen in the photo attached above	2.3.1	<p><i>Health and safety practices are developed and implemented that meet or exceed the ILO Code of Practice on Safety and Health in Forestry Work.</i></p> <p>The presence of an entangled tree was recorded in the field inspection report from 15.04.2021, with recommendation to be removed in the next period.</p> <p><b>At the time of the complaint site visit, entangled tree was observed on site.</b></p>	<ul style="list-style-type: none"> <li>- Managers shall ensure that Health and safety practices are developed and implemented that meet or exceed the ILO Code of Practice on Safety and Health in Forestry Works</li> <li>- <i>See Minor CAR 2021.3:</i></li> </ul>
d	Unauthorized tractor roads, not visibly marked (with the letter T)	1.3.1, 2.3.1	During the site visit it was observed that the tractor roads are marked with “T” in the field. In one spot tracks of wheels were seen, without erosion	<ul style="list-style-type: none"> <li>- Evidence found during the audit at the office and in the field could not</li> </ul>

	<b>Allegation ( from CA-GEN-19a ed to SA completed on17/6/21)</b>	<b>FSC standard reference for FSC National Forest Stewardship Standard of Romania ( FSC-STD-ROU-01-2017 EN)</b>	<b>Finding from SA complaint investigation</b>	<b>SA Conclusion</b>
				confirm breaches of the requirements
e	Tractor roads on slopes with a slope greater than 25 degrees; where the removal of the wood should be done with funiculars / other cable installations.	1.3.1, 2.3.1	No roads having slope over 25 degrees seen in the sub-compartments listed by the complainant. This is also confirmed with the stakeholders during the interviews. Measurement of one tractor road was done during the audit, the slope was 15 degrees.	Evidence found during the audit at the office and in the field could not confirm breaches of the requirements
f	Stream blocked completely by exit roads	6.7.4	<i>Permanent water courses are not blocked by the Organization except for situations authorized by the competent authority.</i> In the sites visited, there are no permanent water courses. For the small streams, the logging companies have implemented protection measures, by installing wooden bridge which was partly removed by a seasonal spring water flow. According to foresters, the bridge will be rebuilt when works will resume on site (September 2021). Branches/parts of assortments were seen on the banks of the non-permanent course; part of the small wood bridge, which was not removed by water flow is in place; according to foresters it will be rebuilt at the end of the restriction period, before resuming the harvest on site.	Evidence found during the audit at the office and in the field could not confirm breaches of the requirements
g	Tree deposits in the forest, not in the primary platform	10.11.2	The timber is sold to the local population after tree felling and cutting into assortments from the stump place (" <i>doborat si fasonat la cioata</i> "). OS Ingka felled the trees and cut them into assortments at the place; then the local people transported them from that place. This is reducing the costs of the timber, as the people are collecting it from the stump directly with their own means (e.g. horse carts). Several parts of trees	Evidence found during the audit at the office and in the field could not confirm breaches of the requirements



	<b>Allegation ( from CA-GEN-19a ed to SA completed on 17/6/21)</b>	<b>FSC standard reference for FSC National Forest Stewardship Standard of Romania ( FSC-STD-ROU-01-2017 EN)</b>	<b>Finding from SA complaint investigation</b>	<b>SA Conclusion</b>
			(e.g. stems) were not removed from the logging area due to beginning of restriction period; however, according to records inspected, and the interviewed foresters, the material will be evacuated at the end of restriction period, when the works will resume (after 15.09.2021)	
h	Potentially illegal use of two forest marking hammers, both square and round in the same location	1.3.1	The rectangular hammermark was used for marking the limits of the logging area (this is used when harvesting is carried out on parts of forest subcompartment thus the limits of the logging area differ from the forest sub-compartments limits). The round hammermark was used for marking the trees which shall be extracted. This is in conformance with the legal requirements and was confirmed during the interview with the state authority representative.	Evidence found during the audit at the office and in the field could not confirm breaches of the requirements
i	Damage to marginal trees is frequently observed in the forest, along tractor roads	10.11.4	<i>Harvesting practices avoid damage to standing residual trees, regeneration and environmental values.</i>  There were few trees damaged along the extraction routes. They were retained by INGA as “sacrifice trees”, being damaged in the past by harvest activities. See annex K category 5 to the FSC National Forest Stewardship Standard of Romania – such trees should be at least 1-3 per hectare.	Evidence found during the audit at the office and in the field could not confirm breaches of the requirements
k	Deep tractor routes, not brought to the initial stage after the end of the operation, which increase the danger of erosion, collecting rainwater	10.10.2	During the site visit it was observed erosion along the tractor routes. At the moment of the site visit, the erosion was not deep. As per forestry regulations, at the end of the works the extraction routes shall be levelled. According to the foresters this will be done at the end of the works on site – autumn 2021.	Evidence found during the audit at the office and in the field could not confirm breaches of the requirements

	<b>Allegation ( from CA-GEN-19a ed to SA completed on 17/6/21)</b>	<b>FSC standard reference for FSC National Forest Stewardship Standard of Romania ( FSC-STD-ROU-01-2017 EN)</b>	<b>Finding from SA complaint investigation</b>	<b>SA Conclusion</b>
I	Timber, branches and other debris were abandoned in the creek bed, which is also an area exposed to floods	6.7.9	<p><i>Where natural watercourses, water bodies*, riparian zones* and their connectivity*, water quantity or water quality have been damaged by activities on land and water by The Organization*, previous managers or contractors, restoration activities* are implemented.</i></p> <p>There is no permanent watercourse in the area. Branches and other debris were seen on the banks of the non-permanent course. A wooden bridge was placed during the works; it was partly removed by a seasonal spring water flow. According to the foresters, the bridge will be rebuilt when the works will resume after 15.09.2021</p>	Evidence found during the audit at the office and in the field could not confirm breaches of the requirements
<b>3</b>	<b>Dălhăuți 1 (ua 801c)</b>			
a	The final progressive connection cuttings removed most of the secular trees, including those that supported the slope above the creek and prevented landslides from spreading, as seen in the attached photo.	8.2.1	<p><i>The environmental impacts of management activities are monitored* consistent with Annex L.</i></p> <p>Documentation inspection shows that the operation was carried out based on the FMP provisions (group shelterwood, final cut - logging area No1742002). Considering this is the final cut, the mature trees were removed. Plenty of natural regeneration, from small seedlings to 2-3 m high trees was left on site.</p> <p>In the area of the forest subcompartment there is a non-permanent water course. At the lower part of the forest subcompartment there is a slope with natural erosion created by the water course during the rainy periods.</p> <p>The erosion is natural and will probably continue as the temporary water is digging the basis of the slope.</p> <p>Several trees were cut at the edge of the erosion slope, leaving the stumps visible. According to the foresters, the trees were inclined and in danger to further determine sliding due to their weight.</p>	Evidence found during the audit at the office and in the field could not confirm breaches of the requirements

	<b>Allegation ( from CA-GEN-19a ed to SA completed on17/6/21)</b>	<b>FSC standard reference for FSC National Forest Stewardship Standard of Romania ( FSC-STD-ROU-01-2017 EN)</b>	<b>Finding from SA complaint investigation</b>	<b>SA Conclusion</b>
b	The stream at the base of the plot has dried up almost completely, being affected in several locations of blockages, excavations and wood material	6.7.9	<p><i>Where natural watercourses, water bodies*, riparian zones* and their connectivity*, water quantity or water quality have been damaged by activities on land and water by The Organization*, previous managers or contractors, restoration activities* are implemented.</i></p> <p>As specified, there is no permanent watercourse in the forest subcompartment. Apparently, the water is infiltrating the soil. During the site visit no wooden material was seen in the watercourse bed. In one area a small puddle was seen, with a snake inside (probably Natrix spp).</p>	Evidence found during the audit at the office and in the field could not confirm breaches of the requirements
c	We have identified a new extraction route, made this year, which descends from subplot 801c into the creek and uses it as an appropriate exploitation / removal road to the communal road	6.7.2	<p><i>Crossing of permanent water courses is allowed in places previously established and marked in the field and on maps.</i></p> <p>During the site visit it was observed that the extraction routes are marked on the field. No new route was approved in the harvest documentation related to the logging area.</p> <p>During the site visit it was observed a route which was not marked in the field – from what it could be seen an old extraction route – which, according to the complaint was used for extracting logs. At the time of the site visit, it was seen that vegetation (herbaceous plants) growth on the extraction route; no deep erosion seen.</p>	Evidence found during the audit at the office and in the field could not confirm breaches of the requirements
d	Deep tractor roads, not brought to the initial stage after the end of the operation, which increase the danger of torrential erosion, collecting rainwater	10.10.2	<p><i>Disturbance or damages to water courses*, water bodies*, soils, rare and threatened species*, habitats*, ecosystems* and landscape values* are prevented, mitigated and repaired in a timely manner*, and management activities modified to prevent further damage.</i></p> <p>According to the forest regulations, the extraction routes shall be levelled at the end of the works. According to the inspection records</p>	<ul style="list-style-type: none"> <li>- the Organisation has taken measures to monitor and mitigate the erosion impacts along the tractor routes</li> <li>- The tracks had been levelled however due to excessive rainfall some erosion had occurred</li> </ul>

	Allegation ( from CA-GEN-19a ed to SA completed on 17/6/21)	FSC standard reference for FSC National Forest Stewardship Standard of Romania ( FSC-STD-ROU-01-2017 EN)	Finding from SA complaint investigation	SA Conclusion
	There are already areas with phenomena of erosion or soil degradation, which will be accentuated in the absence of trees		produced at the end of the works (“Proces verbal”) from 15.03.2021, the extraction routes and the temporary landing place were levelled at the end of the works, this was confirmed during the site visit. However, in the upper part of the logging erosion was seen on short distances in several areas – most probably because of the water flow resulting from excessive, well above average rainfall, from this spring - leaving visible the tracks of the machinery’s wheels. As specified above, the foresters are monitoring the status of the site; internal procedure are developed to address such aspects; evidence e.g. from 121A shows that foresters reacted in case of erosion in progress by placing transversal fences on tracks.	<ul style="list-style-type: none"> <li>- However, considering the effect of climate change is likely to be more frequent severe rainfall events so this should be considered during planning for activities in vulnerable areas.</li> <li>- See <b>Obs 2021.4: under 10.9.3</b></li> </ul>
e	Lack of integration of the minimum conservation measures for ROSPA0141 Vrancea Subcarpathians in the current arrangement which is not even approved by order of the Minister and has not obtained the environmental permit	7.2.1 1.3.1	<p>As specified above, the FMP provides information and conditions related to the protected areas within UP III i.e.:</p> <ul style="list-style-type: none"> <li>- ROSCI0026 “Padurea Cenaru”, 308.3 ha and ROSCI0142 “Padurea Dalhauti”, 103.9 ha - both strictly protected from any operations;</li> <li>- ROSPA0141 – “Subcarpații Vrancei” 803.9 ha – classified as Group I -functional category 5R– having certain restrictions in implementing the forest operations</li> <li>- ROSPA0075 – “Măgura Odobești” 53,5 ha - – classified as Group I - functional category 5R – having certain restrictions in implementing the forest operations</li> </ul> <p>Section 8 of the FMP “Protection of forestland, conservation and enhancing of biodiversity” is providing outlines of the biodiversity aspects.</p> <p>Inspections carried out by the state authorities (National Agency for Natural Protected Areas) did not reveal breaches of the NATURA 2000 site objectives by the forest operations implemented.</p>	Evidence found during the audit at the office and in the field could not confirm breaches of the requirements

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f	Negative impact on the ecotourism potential of the area: the road at the base of subplot 801c is a tourist route that passes through two Natura 2000 sites and leads to Dălhăuti Monastery. Tourists who travel this route see a desolate landscape with stumps, landslides and debris from 801c	8.2.2	<p><i>The social impacts of management activities are monitored* consistent with Annex L.</i></p> <p>The logging area is aside from the road. At the time of the site visit the works ended several months ago; no negative impact could be seen on the road. Interview was held with the Dalhăuti Monastery's representative which states that they did not consider that the forest operations carried out by OS INGKA are negatively impacting the tourism or the landscape in the monastery area.</p>	Evidence found during the audit at the office and in the field could not confirm breaches of the requirements