April 2024

IKEA

SMART OUTSIDE, ROTTEN INSIDE

bruno manser fonds

for the peoples of the rainforest

AGENT GREEN

Contents

Preface

IKEA is convenient. No one would doubt that. Their furniture is pretty cheap and easy to install. Their engineers, marketing and greenwashing are impeccable. One can give them that. But what is cheap for consumers and profitable for IKEA is expensive for nature. IKEA is smart outside but rotten inside.

Agent Green and the Bruno Manser Fund (BMF) have walked the forests of Romania, forests that are either owned by Ingka Investments or feed IKEA furniture suppliers. The investigation findings are of utmost concern. They leave the impression that IKEA treat forests like agricultural crops. Letting trees grow old is not in their culture. Removing entire forests in a short period of time is a matter of urgency for IKEA, the tree hunter. The entity disregards both the written laws and the unwritten ways of nature. IKEA does not practise what they preach regardless of whether it is the European Union nature directives, Romanian national legislation, or the FSC forest certification standard.

One minimum exigence imposed by the FSC standard in Romania is that old trees important for biodiversity are conserved in various forms during logging. For progressive logging, national legislation requires that at least 70% of the forest stand is regenerated before the final cut. Our investigators found that none of these requirements were met for the analysed forests, while the company certifying IKEA's forests did not take any measures. How could they when IKEA contributes to their salaries?

We also found that IKEA does not make a difference between protected areas and production forests. They perform complete removal of the forest habitat even in Natura 2000 protected areas without undergoing environmental appropriate assessments as required by EU law. This means that all families of bears, wolves, lynx, birds and other animals who live in IKEA's forests are becoming homeless. Entire flora and fauna habitats are being degraded or destroyed.

Gabriel Păun
President of Agent Green

Executive Summary

In a context of systemic corruption, poor law enforcement and logging pressure from global timber markets, Romania's forests are under massive threat of degradation and destruction.

This report shows how IKEA and the Ingka Group, its largest franchisee, fail to live up to EU policies, national legislation and even their own declared sustainability standards, as they directly contribute to that destruction. Our analysis has identified over 50 suspected breaches of EU or national law and poor forest management practices. This indicates a consistent pattern of destructive logging in forests that the furniture giant owns or sources wood from in Romania, with catastrophic consequences for nature and climate. As the world's largest individual buyer and retailer of wood and Romania's largest private forest owner (ca. 51,000 ha), IKEA seems to greatly profit from the forest situation in Romania and to extract as much wood as possible. It uses intensive logging and poor forestry practices even in protected areas such as Natura 2000 sites. Inevitably, this results in biodiversity rich forests being rapidly fragmented, degraded, or even converted into barren landscapes.

The findings presented in this report are based on field investigations and analysis of relevant documents including forest management plans (FMPs). A total of nine forest areas were analysed, of which seven are Ingka-owned and two are linked to the IKEA supply chain. In all the analysed forests we found similar patterns of intensive commercial logging, mostly clearcuts and progressive logging, leaving behind severely degraded ecosystems. We documented extreme examples of soil degradation and erosion often observed on barren landscapes with little to no natural forest regeneration. Shockingly, forest degradation occurred in all the sites we visited, including high conservation value (HCV) forests located in protected areas.

Only ca. 0.05% of Ingka's Romanian forests visited by the investigators are under strict protection. 90% are under an intensive wood production regime, despite the fact that four out of seven areas visited are overlapping with Natura 2000 protected areas. Some of these forests were strictly protected before Ingka Investments, the Ingka Group investment arm, bought them. Some of them were under low intensity logging. Everything changed over the past 10 years, since Ingka took over the ownership and management of these forests.

Six of the seven FMPs assessed by the investigators contain absolutely 0% of the forest areas under strict protection. Not even one hectare was found to be under strict protection out of almost 13,000 hectares of the six Ingka-owned areas from the counties of Iași, Buzău, Vrancea, Suceava, Neamț and Argeș. Only 9.96% of these forest areas are under low or moderate intervention regimes, amounting to 1,433 ha. **Overall, from the total of 51,335.49 ha that Ingka Investments owns in Romania (99% forest), only 1.04% are under a strict protection (non-intervention) regime and 8.25% are under partial protection.**

If we assess this situation against the EU Nature Restoration Law and the EU Biodiversity Strategy for 2030, then IKEA is extremely far from meeting these targets. The EU Biodiversity Strategy for 2030 requires EU countries to strictly protect at least 10% of their territory and partially protect at least 30% of their territory. Ingka Investments, as the largest private forest owner in Romania fails to meet these EU targets, at only 1% strict protection and 8% partial protection. **Another key EU objective is to strictly protect all remaining primary or old-growth forests in the EU (not just virgin forests in a narrow sense, as per the current National legislation), while increasing the quantity, quality and resilience of all forests in the EU.** The Nature Restoration Law is also a key policy instrument to reach the EU carbon sinks goal and make the EU climate neutral by 2050.

All in all, our analysis reveals that through a consistent pattern of destructive and allegedly illegal logging IKEA is contributing to the rapid degradation of Romania's forests, especially old-growth forests. This also contributes to compromising the achievement of EU objectives for nature protection and climate by Romania.

It should be noted that as a forest owner and administrator, Ingka Investments is directly responsible for what happens in its forests.

In light of these findings, Agent Green and the Bruno Manser Fund urge IKEA and the Ingka Group to:

- **practice what they preach, so that the "planet positive" image actually matches reality on the ground. In Romania, this means strictly and effectively controlling the conduct of their subcontractors and wood suppliers to put an end to the ongoing destructive logging and bad forestry practices;**

- **immediately halt intensive commercial logging in all owned forests that are located within or near protected areas such as Natura 2000, national and natural parks;**

- **strictly protect (T1) at least 10% of their forest property in Romania; perform only close-to-nature forestry (T2) in 20% and selective logging (T3) in the remaining 70%. This should ensure compliance with national laws, EU nature laws and the FSC standard;**

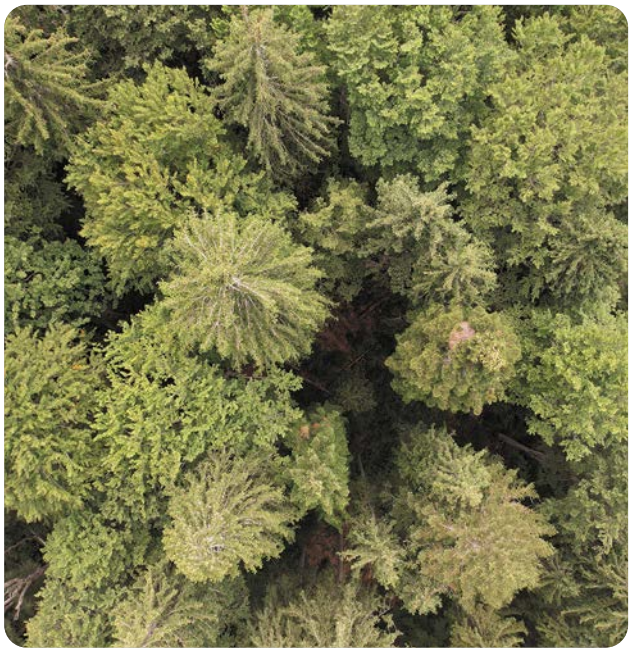
- **strictly protect the entire forest body at Ţibău, an Ingka property that overlaps with the proposed area to establish the future Bucovina Peace National Park;**

- **ensure full traceability of all wood used in IKEA products worldwide, be it massive wood or composites. Only in this way can IKEA guarantee that the wood in its products is free of deforestation and forest degradation;**

- **not accept in its supply chain any wood coming from national or natural parks;**

- **allow independent forest monitoring by civil society and investigative journalists. Involving civil society organisations and independent media in the monitoring process of its own forests (e.g. audits alongside certification bodies) would help to ensure that sustainability standards are correctly implemented and actually meet their goals.**

Finally, we call on IKEA to use its weight to help tackle deeply rooted issues such as corruption and insufficient forest monitoring, in order to change forestry for the better in Romania. **As a company with total revenues of EUR 29.1 billion and a net profit of EUR 1.6 billion in the financial year 2023, the Inter IKEA Group carries a special responsibility. It should set a clear and strong example of respecting and even going beyond legal obligations on sustainable forest management, not just on paper but in its daily practice.**



Old-growth forests in Penteleu, Buzău county. Protected according to EU law but not protected by their owner, Ingka Investments

1. Context

1.1. Deforestation in Romania

Romania's forests are under massive threat of degradation and destruction, and so are the habitats and species they harbour. According to a recent report, although most of the Carpathians have been under some form of protection since the 1990s (e.g. Natura 2000 network, national protected areas), on average only 3% of the Carpathian forests are strictly protected, e.g. from logging and new forest roads. For Romania's remaining primary and old-growth forests, this percentage of strict protection (non-intervention) is only 2.4%.[1] According to Global Forest Watch, between 2001 and 2022 Romania lost 407,000 ha of tree cover. This amounts to a 5% decrease in tree cover since 2000.[2] After the fall of the communist regime in 1989 and the EU accession in 2007, Romania's forests were gradually opened up to global timber markets. They are now under strong logging pressure from the global appetite for timber, against a backdrop of systemic corruption, complex easy-to-circumvent legislation, poor law enforcement, insufficient control capacity and hundreds of vicious logging-related attacks on people who have "dared" to bother the timber mafia in recent years.[3]

The Primofaro forest inventory (2019) identified 525,632 hectares of potential old-growth and primary forests in Romania including 480,054 hectares showing no significant signs of human use since the 1960s.[4] This study purposely includes close-to-nature forests which have been used by humans in the past but have developed again to a very high degree of naturalness and are considered worthy of protection. The identified forests include 116,589 ha of the "virgin and quasi-virgin" forests identified by the 2005 Pin Matra study (Biris and Veen 2005)[5]. As far as High Conservation Value (HCV) forests are concerned, a recent scientific study mapped HCV forests in Romania based on forest continuity since 1955, forest canopy structural and compositional complexity and anthropogenic pressures. It concluded that Romania still hosts over 700,000 ha of HCV forests.[6] However, historically, conservation efforts in Romania have focused on strictly defined "virgin" forests, while other close-to-nature forests with high biodiversity value have been over-critically checked for signs of human use and disqualified from strict protection.[7] To date, only 72,279.43 ha have been included in Romania's National Catalog of Virgin and Quasi-Virgin Forests and are strictly protected.[8]

The conservation of habitats and species is required not only under the EU Birds Directive (79/409/EEC) and Habitats Directive (92/43/EEC), transposed into Romanian legislation since 2007, but also under the

EU Biodiversity Strategy for 2030 and the upcoming EU Nature Restoration Regulation. The goal of the Biodiversity Strategy is to put Europe's biodiversity on the road to recovery by 2030 for the benefit of nature, people and climate. It is scientifically proven that old-growth mixed species forests are 70% more effective as carbon sinks than monoculture forests.[9] Under the strategy, the EU member states committed to legally protect a minimum of 30% of both Europe's land and sea by 2030, and 10% need to be strictly protected. One key objective is to strictly protect all remaining primary or old-growth forests in the EU (not just virgin forests in a narrow sense), while increasing the quantity, quality and resilience of all forests in the EU. Furthermore, the restoration law will require EU member states to restore ecosystems on at least 20% of the EU's land and sea area by 2030.

Under the EU Regulation on deforestation-free supply chains 2023/1115 (EUDR), with rules applicable as of 30 December 2024, Romania will also have the obligation to prevent companies from placing relevant products (including wood and derived products) on the EU market, unless they are: "deforestation-free"; produced in accordance with the relevant legislation of the country of production; and covered by a due diligence statement indicating no more than a negligible risk of non-compliance. Unlike the previous EU Timber Regulation (EUTR), the EUDR also targets logging that is legal in accordance with the laws of the country of production but still results in deforestation or forest degradation.[10]

Over the past years, Agent Green, EuroNatur and ClientEarth have provided the European Commission with overwhelming evidence of the destruction happening in Romania's primary and old-growth forests which are part of the Natura 2000 network of protected areas. However, the EU infringement procedures initiated by the Commission as a result of these efforts are not progressing.[11] More than 100,000 people have signed the petition urging the EU Environment Commissioner, Virginijus Sinkevičius, to refer Romania to the EU Court of Justice in order to put an end to the ongoing forest destruction.[12]

According to the successive analyses of the state of Romania's Natura 2000 sites conducted by Agent Green, EuroNatur and ClientEarth, destructive logging "with papers", i.e. with written authorisation, has even increased since 2020.[13]

It seems that the threat of new measures to halt destructive logging has sparked "panic logging", meaning extracting as much timber as possible (while still possible) and disqualifying entire forest areas from protection. The latest field investigations clearly show that the widely practised progressive logging has been extremely damaging for the analysed Natura 2000 sites because it is conducted at too short intervals, causing the forest to lose its regenerative capacity. Therefore, it often results in barren landscapes similar to cleared forest areas. Other types of commercial logging observed also contribute to forest destruction or degradation. Despite these facts, in Romania commercial logging is still allowed in Natura 2000 sites on large shares of their surface.[14] The forests that Ingka owns or sources wood from make no exception, as detailed in this report.

Romania has started designating Special Areas of Conservation (SACs) for its Natura 2000 Sites of Community Importance (SCI) in 2020. But so far, progress has been slow, leaving these protected areas without management plans and site-specific conservation objectives and measures. This is not in line with the EU Habitats Directive as well as the EU Biodiversity and Forest Strategies for 2030.

The latter state that all remaining primary and old-growth forests must be strictly protected. Under the EU Habitats Directive, impact assessments called Appropriate Assessments (AA) are mandatory for all new plans and projects (such as logging) that may adversely impact Natura 2000 sites.[15] In specific cases, projects require Strategic Environmental Assessments (SEA) and Environmental Impact Assessments (EIAs) under the EU Environmental Impact Assessment Directive (2011/92/EU as amended by 2014/52/EU).[16]

Only one of the Ingka Investments forest management plans (FMPs) in the investigated areas had an AA. Latest investigations confirm the fact that most of the management plans of forests located in Romania's Natura 2000 sites still lack AAs[17], although these legal obligations have been in place since Romania's EU accession in 2007. But even if AAs or EIAs were conducted, national provisions still consider highly damaging types of logging such as progressive logging and clearcuts to align with nature conservation objectives.[18]

Another issue is related to compensations to forest owners for revenues lost due to environmental protection constraints, e.g. in Natura 2000 sites. Monetary compensations have been foreseen by the 2008 Romanian Forest Code but they have not been systematically paid. In addition, it has been reported that the forest compensation legislation has technically disqualified some forests from being included in the National Catalogue of Virgin and Quasi-Virgin Forests, while it has financially undermined initiatives on the part of local communities to voluntarily include certain areas. This was because public authorities, such as village councils managing community forests, were not eligible for compensation.[19] At the same time, the forest restitution process which started in the 1990s fragmented forests over small areas, often under 10 ha, and created hundreds of thousands of "new" forest owners. Under the 2008 Forest Code, owners of forest areas smaller than 100 ha (who did not associate with others to request common forest management plans) were not allowed to harvest due to lack of FMP. This situation led to massive "panic logging" on top of other illegal logging happening in restituted forests. According to the scientific study of Angelova et al. 2009, 15% of the restituted forest area was deforested by 2006.[20]

1.2. IKEA's sustainability promises

The Ingka Group, based in the Netherlands, is a company licensed to operate IKEA retail operations in a number of countries worldwide. It is the largest of the 12 IKEA franchisees operating IKEA stores and other sales channels under agreements with the Inter IKEA Group based in Liechtenstein.[21] The Ingka Group has three business areas: 1) IKEA Retail consisting of 482 IKEA stores across 31 markets; 2) Ingka Centres consisting of 44 shopping centres across Europe and China; and 3) Ingka Investments created to make "responsible investments in the company's core business" (IKEA retail).[22] The IKEA Group has recently become the Ingka Group which is owned by the INGKA Foundation.[23]

IKEA has a comprehensive sustainability strategy. It claims to be people and planet positive, to become circular and climate-positive, to use regenerating resources, all while at the same time continuing to grow its business.[24] IKEA states that it ensures its wood is traceable and comes only from responsibly managed forests through a comprehensive due diligence system, including regular audits and inspections, and the FSC certification as an additional safeguard. Thus, IKEA states that "under no circumstances do we accept wood that fails to meet our critical requirements. If we discover irregularities, we take immediate action."[25] We have looked at how IKEA is putting these principles into practice in the Romanian forests. Our investigation shows a very different picture, as detailed in the next chapters.[26,27]

2. Methodology

For this investigation, we conducted a preliminary examination of a total of thirty forest sites owned by Ingka Investments or connected to IKEA's main suppliers in Romania. We narrowed the list down to nine forest areas and three connected factories and large deposits. Seven of the forests selected for analysis are Ingka-owned and two are forests linked to IKEA's supply chain. The main criteria for selection of the forest areas were: 1) the wood volumes extracted based on the forest management plans (FMPs); 2) the visibility of forest openings on satellite images; 3) the presence of protected areas; 4) the potential presence of old-growth or primary forests; 5) the forest accessibility; and 6) the risks involved in entering those forests.

For our investigation of recent logging, we used both open data sources such as Google Earth and the Copernicus Data Space Ecosystem Browser of the EU Earth Observation Programme. Google Earth satellite imagery had limitations because some of the images were 2 to 5 years old. However, on the Copernicus browser we could find weekly updates of satellite imagery in low resolution. This became the main source of satellite imagery for our analysis. Below you can see an example of what a forest in Suceava looks like on Google Earth as compared to Copernicus. Preliminary findings from satellite image analysis were validated on the ground.

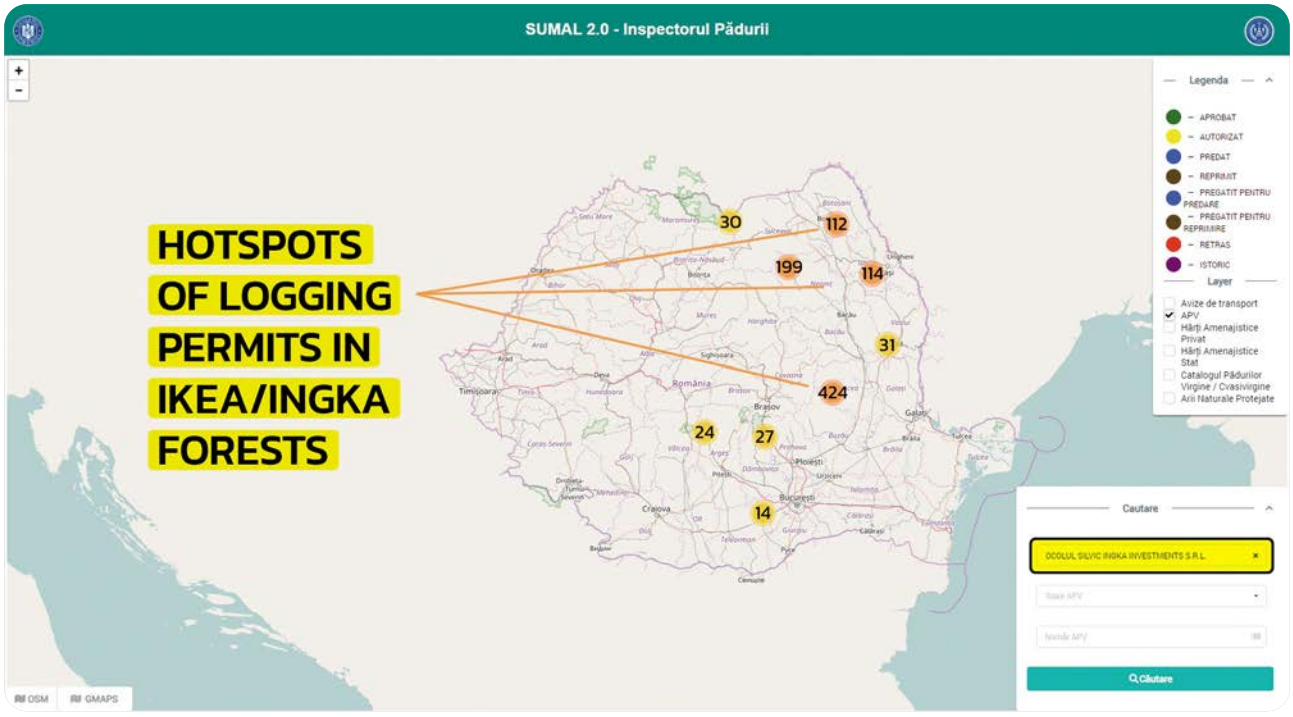
Regarding harvested wood volumes, we looked mainly at individual logging permits (APVs) issued in relation to each of the thirty forest areas. We analysed together with a forest engineer if the logging permits declared in SUMAL, the Romanian wood traceability system, matched reality on the ground. In respect to the forest stands and their management including protection regime, we detected the presence of old forests, some potentially old-growth or even primary forests, in remote areas such as the Penteleu Natura 2000 site. In addition, six out of the nine analysed forests are inside or neighbouring protected areas, mainly Natura 2000 sites.

A large number of the forest sites visited were not selected because of their inaccessibility and the security risks involved. We have not included into the analysis properties that in the past have proven both difficult to access and dangerous, for example forest areas where we have been stopped and threatened by loggers.

The forest sites considered safe were visited from April 2023 to February 2024. Field data was collected with regard to a number of indicators related to specific legal obligations (EU and national) on forest management and nature conservation. These indicators include: 1) the state of natural regeneration of logged forest areas; 2) the state of soil; and 3) the overall state of natural habitats. In particular, each location was checked for habitat degradation, natural tree regeneration after logging and any trace of bad forest management practices, such as soil erosion or damage to standing trees due to logging.

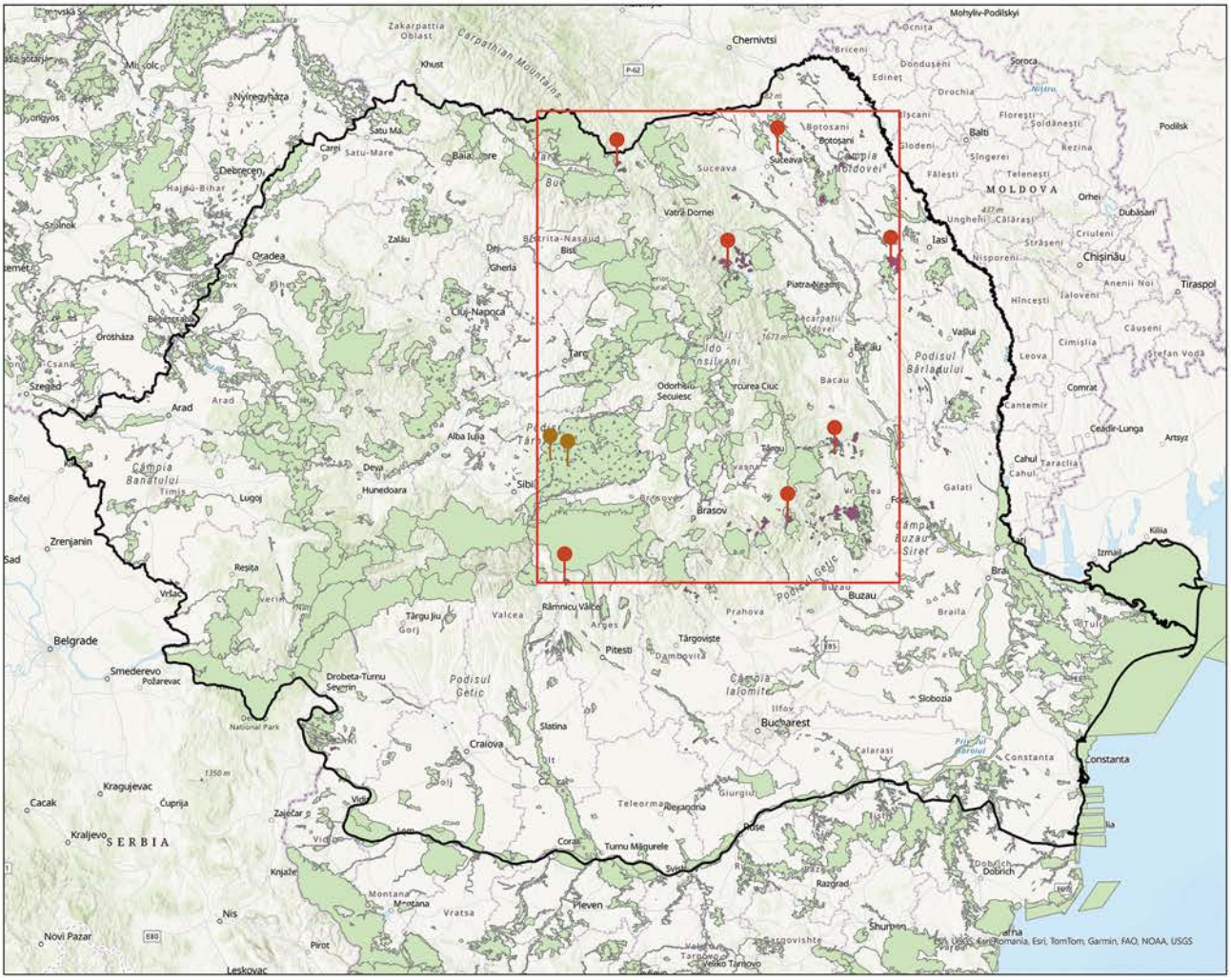
The field investigation was complemented by an analysis of the forest management plans (FMPs) of the visited forests. Key analysed aspects of the FMPs are: 1) the planned logging volumes for the period 2021-2023; 2) the logging types; 3) the tree species composition; 4) the forest functions (protection, production); 5) the forest management types according to Romanian legislation (functional types T1, T2 etc.; see Glossary).

Satellite photos of Ingka forest near Feteşti, Suceava. Google earth photo (up) and ESRI Satelite more recent photo based on Sentinel2 (down)



Map of logging permits issued to Ingka Investments in Romania. Source: SUMAL Romanian wood traceability system, Forest Inspector application

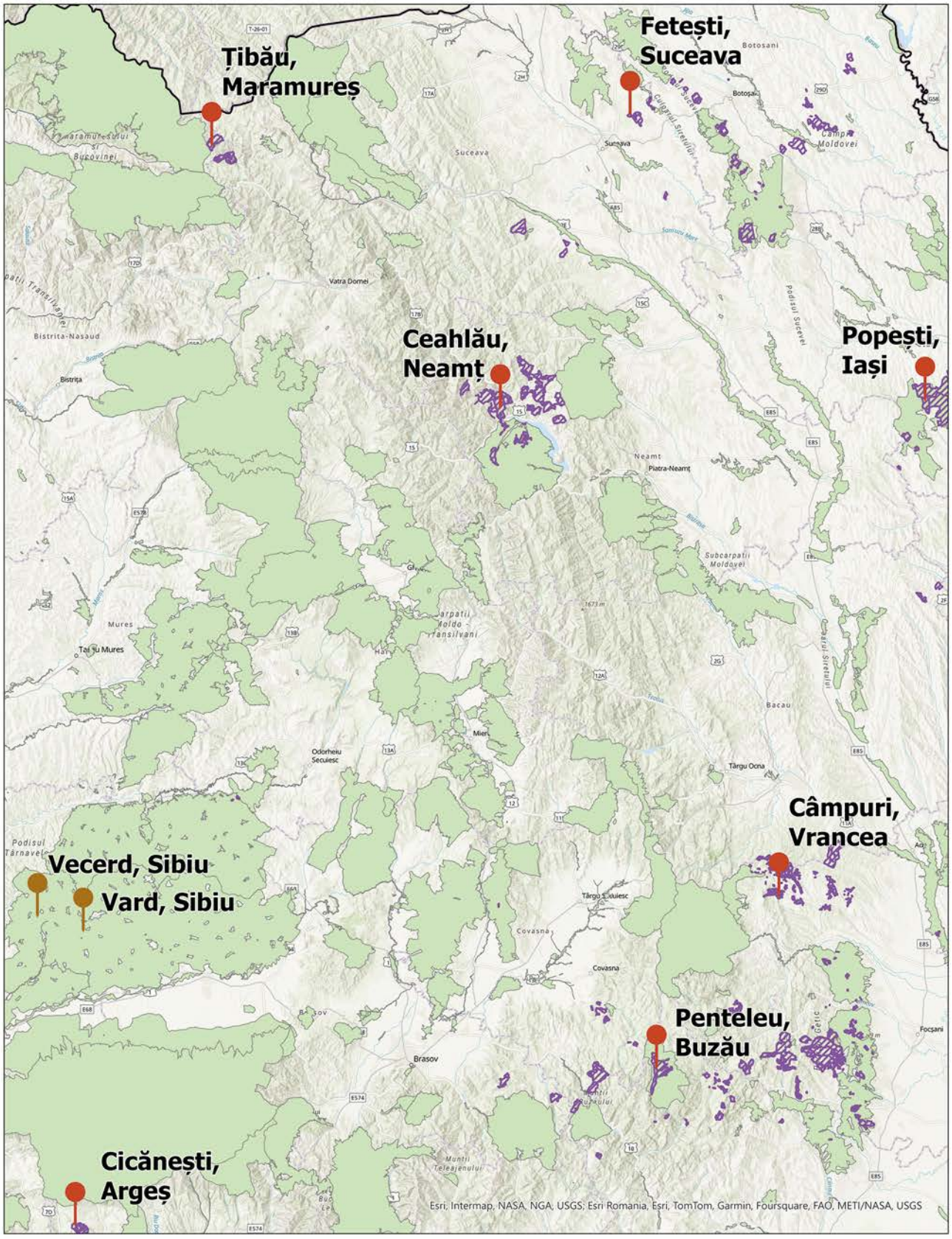
Map of analysed forest areas, Ingka-owned or Ingka-linked via IKEA supply chain



Legend

- Visited forests Ingka-linked
- Visited forests Ingka-owned
- Ingka Investments properties
- Natura 2000 protected areas
- Romania

N


Țibău, Maramureș
Fetești, Suceava
Ceahlău, Neamț
Popești, Iași
Câmpuri, Vrancea
Vecerd, Sibiu
Vard, Sibiu
Penteleu, Buzău
Cicănești, Argeș
Esri, Intermap, NASA, NGA, USGS; Esri Romania, Esri, TomTom, Garmin, Foursquare, FAO, METI/NASA, USGS

3. Results

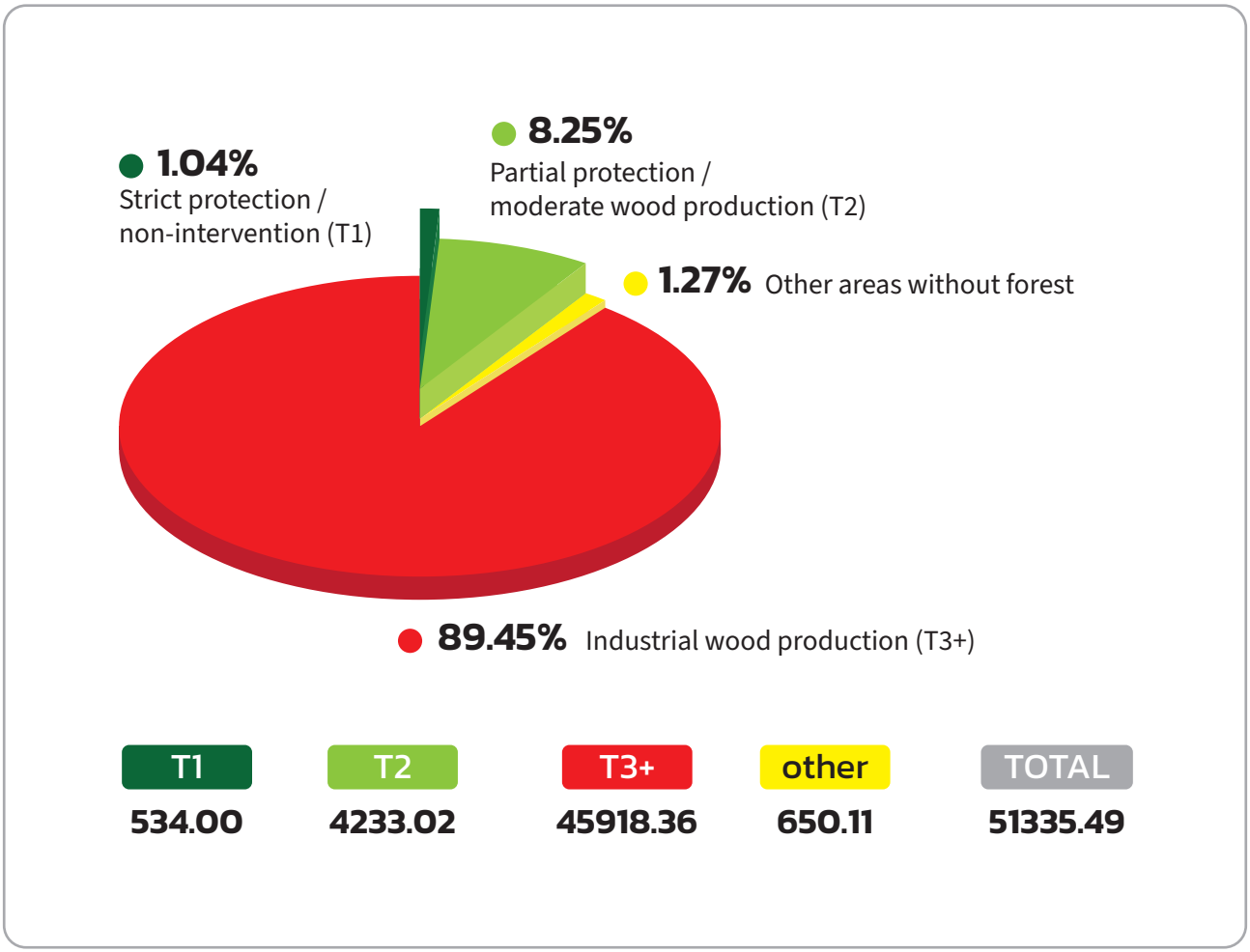
The management types, including protection regimes, of the analysed forests is presented in the following table. From a total of 14,385.38 hectares of Ingka-owned forests visited:

- **89.99% (12,945.80 ha) are under intensive logging regimes** (T3+; limited to no protection, large-scale industrial wood production allowed);
- **9.96% (1,433 ha) are under a moderate intervention regime** (T2; partial protection); and
- **only 0.05% (6.5 ha) are under a strict protection regime** (T1; no intervention).

Our analysis also covered the forest management types of all Ingka Investments properties in Romania which amount to 51,335.49 ha. From this total area, only 1.04% (534 ha) are under strict protection (functional type T1) and 8.25% (4,233.02 ha) are under partial protection (T2). The rest are managed for industrial wood production (T3, T4, T6). We have also discovered that the areas under strict and partial protection are not evenly distributed throughout the Ingka Investments properties. For example, 76% of the strictly protected area (407 ha) is located in one forest in Valea Neagră, Motnau. Without this property, the remaining 42 forest areas owned by Ingka (45,597 ha) would only average 0.28% of strict protection (T1).

With regard to the analysed forests owned by Ingka Investments in Romania, our investigation indicates at least 50 suspected violations of EU or Romanian legislation as well as poor forest management practices. They are summarised in Annex 1.

Ingka forest management in Romania



Forest management types of all Ingka Investments properties in Romania

Table 1: Management type of the analysed Ingka-owned forest areas

Analysed forest area; production unit (U.P.) according to FMPs	Total forest area (ha)	Intensive wood production (TIII+TIV+TVI) ha / %		Moderate interventions/ Partial protection (TII) ha / %		Non-intervention/ Strict protection (TI) ha / %	
1. U.P. Popești, Iași	2,923.20	2,907.90 ha	99.48%	15.30 ha	0.52%	**0 ha**	**0%**
2. U.P. Nehoiu, Buzău (Penteleu)	1,552.80	1,361.30 ha	87.67%	191.50 ha	12.33%	**0 ha**	**0%**
3. 2 U.P. Țibău, Maramureș	1,398.90	1,335.20 ha	95.45%	57.20 ha	4.09%	6.50 ha	0.46%
4. U.P. Adâncata, Suceava	432.60	432.60 ha	**100%**	**0 ha**	**0%**	**0 ha**	**0%**
5. U.P. Cicănești, Argeș	949.80	804.10 ha	84.66%	145.70 ha	15.34%	**0 ha**	**0%**
6. U.P. Ceahlău/ Dreptu, Neamț	3,388.10	2,871.70 ha	84.76%	516.40 ha	15.24%	**0 ha**	**0%**
7. U.P. Câmpuri-Panciu, Vrancea	3,739.98	3,233.00 ha	86.44%	506.98 ha	13.56%	**0 ha**	**0%**
Total size (ha)	**14,385.38**	**12,945.80**		**1,433.08**		**6.50**	
Percentage %		**89.99%**		**9.96%**		**0.05%**	
EU recommended %				30%		10%	

3.1 Ingka-owned forests

Location 1: Popești, Iași. Ingka-owned forest in Natura 2000 protected area

For the forest near Popești, Iași county, the large forest openings we saw on satellite images were confirmed on the ground. In particular, this was the case for one central location where several logging permits had been issued for parcels in close vicinity to one another. Logging on these parcels created a large opening in the forest, resembling a clearcut in places.

Large progressive logging site resembling clearcut near Popești, Iași county

Table 2: Analysis of the forest near Popești, Iași

Location name	Popești, Iași
Location GPS	47°04’31.2”N 27°15’43.9”E
Forest owner	Ingka Investments Forest Assets SRL
Forest management plan (FMP)	FMP from 2017
Old growth forest	Potentially
Protected area	Yes, two Natura 2000 sites: Pădurea Floreanu - Frumușica - Ciurea ROSPA0163, ROSCI01052
Habitats and species examples / Threatened species on IUCN Red List	Species include: Lesser spotted eagle (*Aquila pomarina*), Eurasian eagle-owl (*Bubo bubo*), hen harrier (*Circus cyaneus*, threatened), Montagu’s harrier (*Circus pygargus*, threatened).

	The appropriate assessments (AA) conducted for other forests inside the same Natura 2000 site have found many more species than described in the EU standard data form. This indicates the need for a management plan. This is one of the Natura 2000 sites where a Special Area of Conservation (SAC) has not been designated, although it has been 17 years since ROSCI01052 was created. This is in breach of the EU Habitats Directive. Ingka has been the owner of this forest since 2016. All the logging works of the past 8 years have been done in the absence of a Natura 2000 management plan and AA as required by EU legislation.
Environmental / Appropriate Assessment (AA)	**Not available at the time of site visit, in breach of EU Habitats Directive; in progress as of 2024 but not yet approved**
Logging permits	Several logging permits (APV), including: APV 2200125300050 APV 2200125300520 APV 2200125300770
Type of logging	Progressive logging
Logging active/inactive	Active in 2023
Volume of wood extracted 2021-2023	Over 3,200 m^3
Type of wood extracted	European beech (*Fagus sylvatica*) and oak (*Quercus petraea, Quercus robur*)
Suspected breaches of law and bad forest management practices	• appropriate assessment (AA) not performed before logging • number of allowed interventions was exceeded in parcel 144 (2 instead of 1) • maximum allowed wood volume to be extracted was exceeded in parcels 144 and 145A by a total of 200.50 m^3 • poor natural regeneration for oak species • biotope trees and dead wood missing • clearcut around water bodies (several ponds) • habitats and threatened species affected • breaches of SUMAL wood traceability system, e.g. several transport notices showed deficiencies such as wood loads not clearly visible and abnormal routes taken • soil degradation including erosion • damage to trees not subject to logging.

Other forest owners neighbouring the Ingka Investments property near Popești have done their appropriate assessment (AA). However, Ingka has so far failed to conduct an AA, in breach of the EU Habitats Directive, despite owning this property since 2016.

Suspected breaches of EU and national legislation

Final progressive logging was conducted here in the absence of natural regeneration of main tree species, in particular oak (*Quercus petraea, Quercus robur*), in breach of national legislation. The Romanian technical norms require that a forest parcel is regenerated to a minimum of 70% before the final stage of progressive logging is done ("tăieri de racordare", connection cuts).[28]

As a result, the legally required species composition has not been maintained here. According to national law, when a parcel has a large percentage of commercially valuable species such as oak (*Quercus petraea, Quercus robur*), the natural regeneration of these species must be promoted during the logging operation, so that the current species composition is maintained or improved. In this case, the correct procedure would have been to delay final logging until the confirmation that a new generation of oak saplings was present in a large enough percentage. This did not happen here: while the original forest had oak trees in percentage of 30-50%, the new poorly regenerated forest has less than 5% oak in its composition.

Without manual replanting of oak (*Quercus petraea, Quercus robur*) in the forest near Popești, these species will be completely replaced here by faster growing but less commercially valuable species such as hornbeam (*Carpinus betulus*) and beech (*Fagus sylvatica*). The local disappearance of oak has a negative impact not only on the economic value of wood but also on the biodiversity of this area. This is because all the species dependent or growing on oak trees, for instance vulnerable saprophytic beetles such as the Great Capricorn beetle (*Cerambyx cerdo*), will also disappear. Any negative impact on vulnerable species of European conservative interest is in breach of EU nature conservation legislation, notably the Habitats Directive.

National and EU legislation also requires that 3 to 5 large biotope trees per hectare are left standing in order to promote biodiversity. There were hundreds of large monumental trees in this forest area but they have all been cut down. We measured several tree stumps of over 1m in diameter. All the insects, fungi, mushrooms, birds, mammals and other species that were dependent on these big biotope trees have also disappeared from the logged area.

The EU Habitats Directive requires that where there are permanent water bodies in the forest such as marsh areas, ponds, streams and lakes, these ecologically sensitive areas are protected by keeping them shaded and not cutting the trees around them. However, we found several wet areas inside these forest parcels where all the surrounding trees had been cut. This type of irresponsible forest management will likely result in the permanent disappearance of these wet

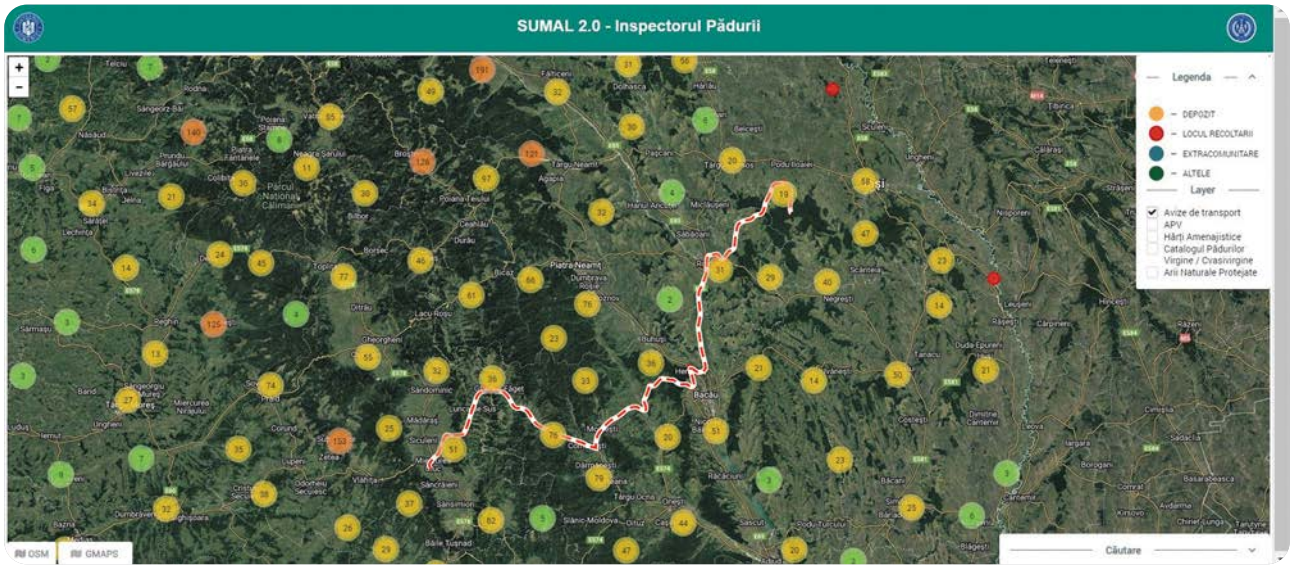
Progressive logging site with very little natural regeneration near Popești, Iași

areas through evaporation and the disappearance of all the species dependent on water, such as amphibians, insects, birds and others.

Pond with all trees around it cut down in the Ingka forest near Popeşti, Iaşi

According to SUMAL, the Romanian wood traceability system, the Frumuşica Natura 2000 forest area has over 100 logging permits issued in the last three years. This is the second biggest concentration of logging permits in Ingka properties in Romania after Ceahlău. It is shocking to see that logging in and around protected areas happens at higher intensities than in Ingka-owned forests without a protection status.

We tracked some of the oak trees (*Quercus petraea, Quercus robur*) logged in this forest. As visible in the photo below, they were going directly to the Iris Services factory in Miercurea Ciuc, which is a major supplier of furniture to IKEA.



Map from SUMAL wood traceability system, Forest Inspector application, showing the route taken by transport no. BC74SGR on 28.08.2023 from the forest outside Popeşti to the Iris factory in Miercurea Ciuc

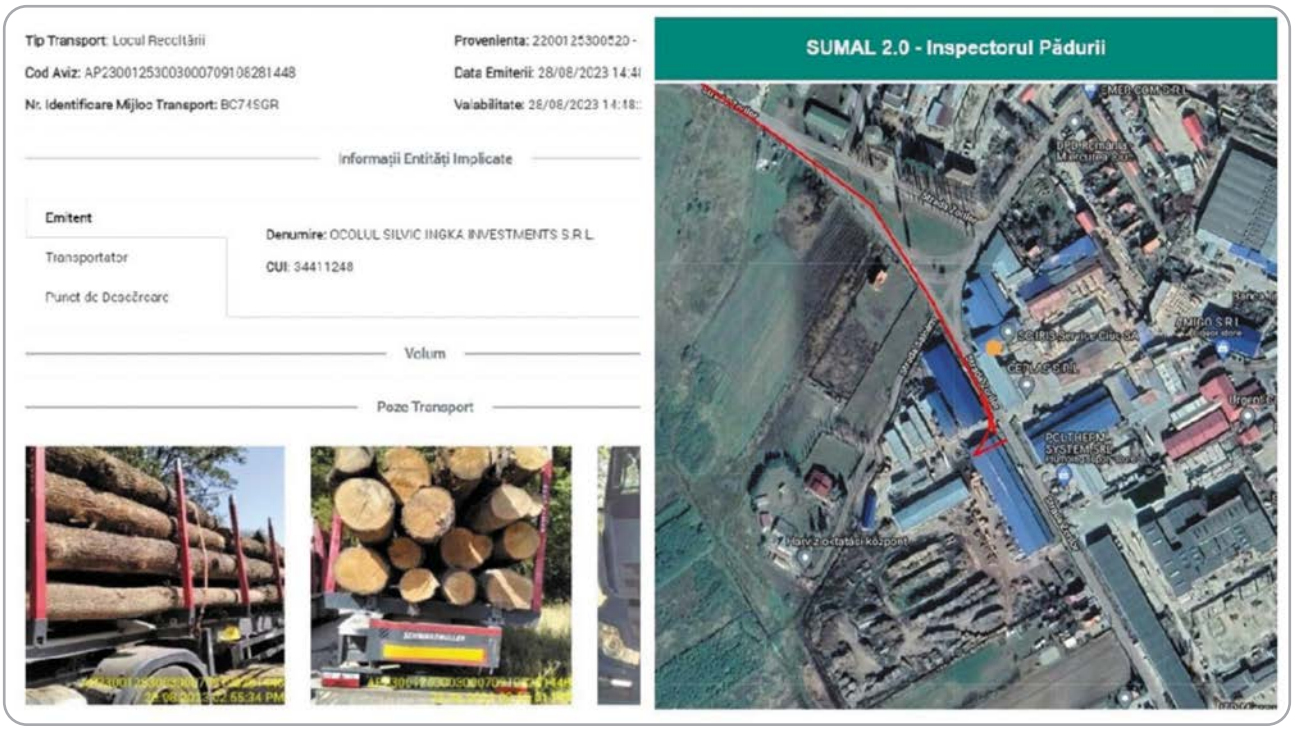


Photo from SUMAL wood traceability system, Forest Inspector application, showing the wood transported by truck no. BC74SGR on 28.08.2023 from the forest outside Popeşti to the Iris factory in Miercurea Ciuc

Iris factory in Miercurea Ciuc, is a main supplier to IKEA in Romania

Table 3: Protection regime of the forest near Popești, Iași

Forest management	Surface (ha)	Percentage of forest (%)
Intensive wood production (T4+T6)	2,907.9	99.5
Moderate interventions (T2)	15.3	0.5
Non-intervention (T1)	**0**	**0**
TOTAL	2,923.2	100%

Despite its Natura 2000 protection status, not even one hectare of this forest is strictly protected. More worryingly, 99.5% of it is under an intensive wood production regime.

Location 2: Penteleu, Buzău. Ingka-owned forest in Natura 2000 protected area

The Penteleu forest in Buzău county is a very important site because it is one of the few Ingka Investments properties with a large concentration of potentially old-growth forests (several hundred hectares). Despite their high conservation value (HCV), none of these forest areas are under a strict protection regime. What Ingka is doing instead is degrading these remaining old-growth and potentially virgin forest parcels and disqualifying them from strict protection. It does so by downgrading them in terms of average ages, making "light" interventions such as sanitary logging, and finally opening them up to commercial logging. Intensive logging in the oldest parcels is then conducted as a matter of urgency, as described by Agent Green in the 2021 report on IKEA.[29] What is different on this occasion is that only now the impact of this destructive forest management is clearly visible and shocking to see on the ground. For example, where we were expecting to see mild interventions such as "cvasigrădinărite" (close to nature forestry) as stated in the forest management plan (FMP), an intervention that is meant to increase diversity of tree ages in the forest, we found traces of clearcuts on the ground.

Ingka-owned old-growth forest in Penteleu, Buzău. Degraded forest area

Ingka-owned old-growth forest in Penteleu, Buzău. Area not yet impacted by intensive logging

Table 4: Analysis of the forest of Penteleu, Buzău

Location name	Penteleu, Buzău
Location GPS	45°37’59.9”N 26°22’07.3”E
Forest owner	Ingka Investments Forest Assets SRL
Forest management plan (FMP)	Yes, from 2017
Old growth forest	Yes, very likely
Protected area	Yes, Penteleu Natura 2000 site ROSCI0190
Habitats and species examples / Threatened species on IUCN Red List	Habitats include: *Luzulo-Fagetum* beech forests, Alluvial forests with Alnus glutinosa and F*raxinus excelsior*, *Acidophilous Picea* forests of the montane to alpine levels (Vaccinio-Piceetea), Dacian Beech forests (*Symphyto-Fagion*), Alpine rivers and their ligneous vegetation with *Myricaria germanica*, Alpine and Boreal heaths Species include: wolf (*Canis lupus*), Eurasian otter (*Lutra lutra*), Lynx (*Lynx lynx, near threatened*), brown bear (*Ursus arctos*), crested newt (*Triturus cristatus*), Montandon’s newt (*Triturus montandoni*), *Barbus petenyi, Campanula serrata, Carabus variolosus, Euplagia quadripunctaria, Rosalia alpina*

Environmental / Appropriate Assessment (AA)	**Not available at the time of site visit, in breach of EU Habitats Directive; in progress as of 2024 but not yet approved**
Logging permits	Several logging permits (APV), including: APV 2100125303000 sanitary logging APV 2200125300710 accidental logging APV 2100125302920 accidental logging APV 2100125303010 sanitary logging APV 2100125301790 “close to nature” logging APV 2200125303040 “close to nature” logging APV 2200125303200 “close to nature” logging APV 2100125300780 “close to nature” logging
Type of logging	Close to nature logging (“cvasigrădinărite”) resembling progressive logging on the ground
Logging active/inactive	Active in 2023
Volume of wood extracted 2021-2023	Over 10,000 m^3
Type of wood extracted	Beech (Fagus sylvatica), spruce (Picea abies) and fir (Pinus sylvestris)
Suspected breaches of law and bad forest management practices	• environmental assessment (AA) not performed before logging, in breach of EU Habitats Directive • falsification of average age for several parcels in forest management plan (FMP) opening them up to logging • clearcuts disguised as close to nature forestry • degradation of potentially primary and old-growth forest • severe soil erosion due to use of heavy machinery during rainy weather • damages to trees which were not subject to logging • disqualification of forest areas from inclusion into National catalogue for virgin and quasi-virgin forests.

In Penteleu, primary and old-growth forest plots had survived until the start of the current forest management plan (FMP) in 2017. As the forest owner and administrator, Ingka Investments had a legal responsibility to identify and protect these intact forest areas. Instead, the firm which drew up the FMP for Ingka appears to have deliberately chosen to degrade these areas by any means possible. This includes falsifying the average ages of some plots, so that they no longer meet the criteria for strict protection under Romanian legislation. For example:

- Parcel 11C, called “u.a.” 11C in the FMP (planning unit), was 161 years old in 2017, with a consistency (forest stand density) of 0.8 and without forestry interventions in the previous decade. This forest plot is now proposed for conservation cuts.
- Parcel 12A was 155 years old and incorrectly described in the FMP as 105 years old, with a consistency of 0.8 and minor forestry interventions in the past (sanitary logging). This plot is now proposed for conservation cuts. It is also a seed reservation.

DESCRIEREA STATIUNII SI ARBORETULUI

12 A 18.0 HA GF.1-5H,1G,5M SUP:K TS:3333 TP:1311
SOL:4101 Versant framintat, EXPOZITIE E
INC. 20 G ALTITUDINE: 1000-1150 M.
LITIERA:continua - normala TIP FLORA:Asperula-Dentaria
Natural fundamental prod. sup relativ-plurien
COMP.ACTUALA : 5 MO 2 BR 3 FA
COMP.TEL : 6 MO 2 BR 2 FA
SORT:MO Gros si f.gros,cherestea VIRSTA EXPL.
SEM.UTIL:
SUBARBORET:
DATE COMPL. Alte date complement.

POL: ERZ:
LUCRARI EXEC. 2015-T.igiena

LUCRARI PROP. T.IGIENA

EIM ARB	P R P	M. RE GE	VIR STA ANI	D CM	H M	C L P	AM ES TE	EL AG AJ	PROVE- NIENTA	VI TA LI	DENS CONS	VOLUM MC/ HA	VOLUM MC/ UA	CRES MC/ HA
MO	3	IN	155	52	34	2	I	.7	RN	N	0.24	163	2934	1.1
BR	1	IN	155	50	33	2	I	.7	RN	N	0.08	39	702	0.5
FA	3	IN	155	50	30	2	I	.7	RN	N	0.24	166	2988	0.9
MO	2	IN	105	48	30	2	I	.7	RN	N	0.16	109	1962	1.2
BR	1	IN	105	38	29	2	I	.7	RN	N	0.08	39	702	0.7
TOTAL			105			2					0.80	516	9288	4.4

12A parcel description according to forest management plan (FMP)

The 12A parcel description clearly indicates that, at the time of the FMP development in 2017, 70% of this forest parcel was aged 155 and only 30% thereof was aged 105. The dominant age element therefore should have been 155, as shown in the age box for this parcel above. Instead, the average age (visible at the bottom of the screenshot above) was lowered by 50 years to 105.

- Parcel 13A was 160 years old and very likely an old growth forest and a seed reserve, with a consistency of 0.9 and without forestry interventions in the past. It is now proposed for sanitary logging.

- Parcel 14A was 155 years old and was incorrectly described on the map as 120 years old, with a consistency of 0.9 and no forestry interventions in the past. It is now proposed for sanitary logging. Again, this was potentially an old growth forest before Ingka did the first round of sanitary logging.

DESCRIEREA STATIUNII SI ARBORETULUI

14 A 20.5 HA GF.1-1G,4J,5M SUP:J TS:3333 TP:1311
SOL:3101 Versant ondulat , EXPOZITIE E
INC. 25 G ALTITUDINE: 1050-1150 M.
LITIERA:continua - normala TIP FLORA:Asperula-Dentaria
Natural fundamental prod. sup relativ-plurien
COMP.ACTUALA : 5 MO 2 BR 3 FA
COMP.TEL : 4 MO 3 BR 3 FA
SORT:MO Gros si f.gros,cherestea VIRSTA EXPL.120 ani
SEM.UTIL: 6FA 3BR 1MO
SUBARBORET:
DATE COMPL.

POL: ERZ:
LUCRARI EXEC.

LUCRARI PROP. T.IGIENA(T.cvasigrad dec II)

EIM ARB	P R P	M. RE GE	VIR STA ANI	D CM	H M	C L P	AM ES TE	EL AG AJ	PROVE- NIENTA	VI TA LI	DENS CONS	VOLUM MC/ HA	VOLUM MC/ UA	CRES MC/ HA
MO	2	IN	155	56	37	2	I	.7	RN	N	0.18	140	2870	0.8
BR	1	IN	155	58	36	2	I	.7	RN	N	0.09	70	1435	0.6
FA	3	IN	155	52	32	2	I	.6	RN	N	0.27	210	4305	1.0
MO	3	IN	120	44	35	2	I	.7	RN	N	0.27	211	4326	1.4
BR	1	IN	120	44	34	2	I	.7	RN	N	0.09	70	1435	0.6
TOTAL			120			2					0.90	701	14371	4.4

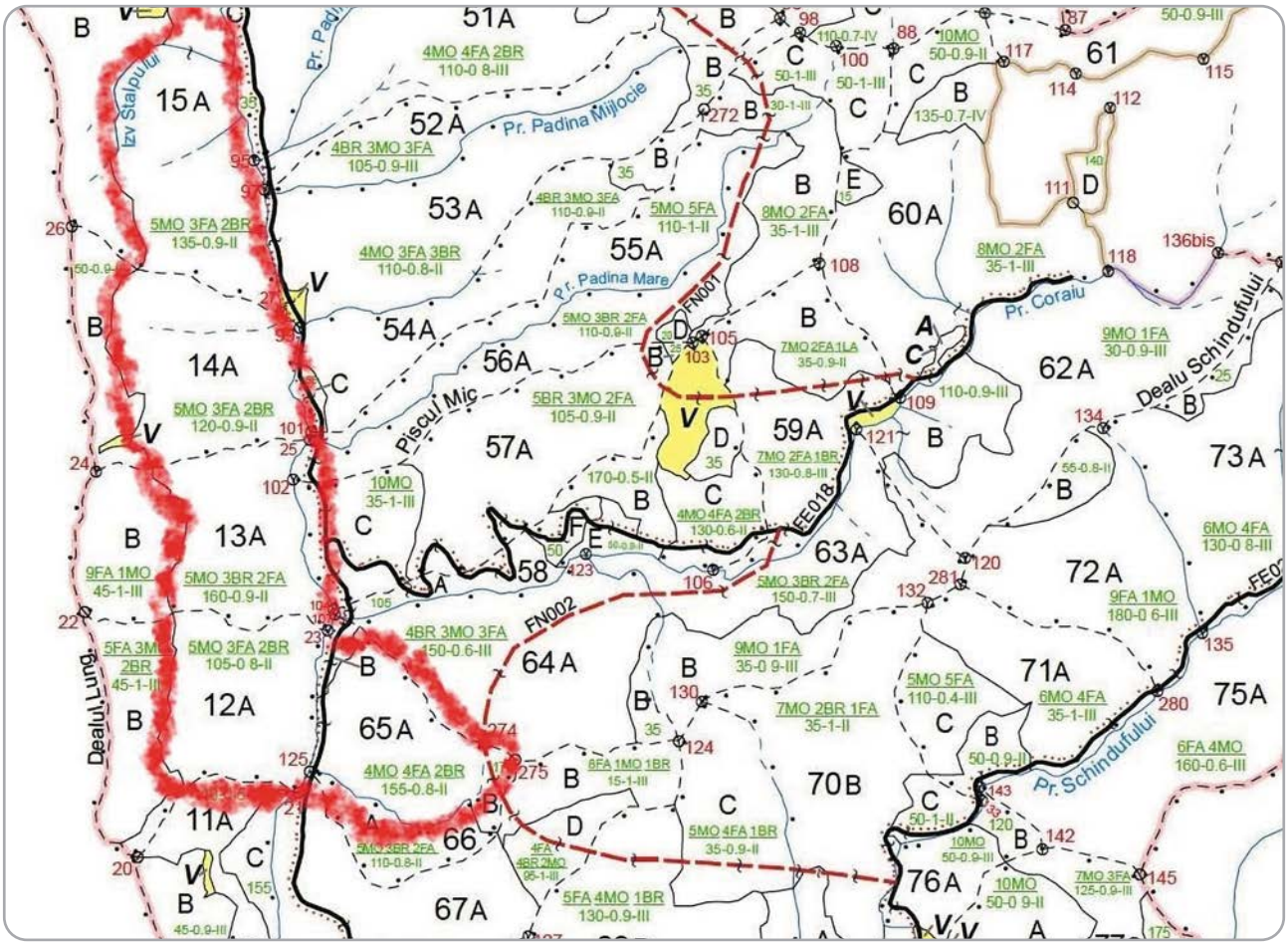
14A parcel description according to forest management plan (FMP)

The 14A parcel description clearly indicates that, in 2017, 60% of the forest parcel was 155 years old and only 40% was aged 120. Therefore, the current dominant age should have been 155 but instead the age was lowered by 35 years to 120, as visible at the bottom of the screenshot above.

- Parcel 15A had an average age of 135 years but it also had 30% of trees aged 160 years, with a consistency of 0.9 and without forestry interventions in the past. It is now proposed for sanitary logging. Again, this was a potentially old growth forest.

Together, forest parcels 11C, 12A, 13A, 14A and 15A form a common body of 86 ha and may have qualified for inclusion in the national catalogue of virgin and quasi-virgin forests (i.e. strict protection). The catalogue requires that forest parcels that have at least 10% of trees aged 150 years or older, with natural development and no signs of human activities in the past 30 years should be recognised as virgin or cvasi-virgin forests and strictly protected by their owners.

But due to downgrading through falsification of average ages for plots 12A and 14A in the forest management plan (FMP) and interventions such as sanitary logging, they no longer form a common group and independently they do not meet the minimum size of 30 ha for inclusion in the national catalogue. Nevertheless, we believe that they still fulfil the EU criteria for old-growth forests and should be strictly protected as such.



Parcels with old-growth forest forming a compact body that would have qualified for strict protection if they had not been downgraded

We have also documented how Ingka sees the final result of their forest management of old-growth forest stands. Where there used to be intact old-growth forests, Ikea has authorised so-called "close to nature" forestry which, on paper at least, is one of the most non-intrusive types of logging and similar to conservation logging. What we found instead on the ground is aggressive, commercial logging that resembles clearcuts or progressive logging, where all the mature forest stands have been removed.

For this location, on satellite images we can see new and older gaps in the vegetation, indicating multiple interventions without natural regeneration. Our suspicion here is that clearcuts and progressive logging are disguised as "close to nature" ("cvasigrădinărite") logging, and there is a very big difference between these types of logging.

Some of these degraded old-growth forest parcels that we visited in Penteleu were:

- Parcel 16A had an average age of 166 years.

Despite this age, it was cut almost to the ground. It already had a reduced consistency of only 0.2 in 2019, after which another 1100 m^3 were removed in 2021 through the logging permit (APV) 2100125301790.

- Parcel 17A had an average age of 166 years. Despite this age, it was cut almost to the ground. It already had a reduced consistency of only 0.2 in 2019, after which another 700 m^3 were removed in 2023 through the logging permit (APV) 2200125303040.

- Parcel 18B had an average age of 171 years. Despite this age, it was cut almost to the ground. It already had a reduced consistency of only 0.1 in 2017, after which another 611 m^3 were removed in 2023 through the logging permit (APV) 2200125303200.

- Parcel 19A had an average age of 166 years. It had a reduced consistency of only 0.4 in 2019, after which another 1400 m^3 were removed in 2023 through the logging permit (APV) 2100125300780.

Suspected breaches of EU and national legislation

The main issue we found in Penteleu is the degradation of potentially primary and old-growth forest stands through logging works. These are the most valuable forest habitats in the EU and they must be strictly protected. Specifically, the grouping of parcels 11C, 12A, 13A, 14A, 15A and 65A would have likely met the conditions for inclusion in the national catalogue of virgin and quasi-virgin forests, especially in terms of average age. We do not have the full history of these parcels for the past 30 years to make a precise analysis regarding catalogue inclusion. **However, according to national law, the forest owner had the obligation to identify and protect these forest parcels. Moreover, they still meet the EU criteria to be classified as old-growth forests and be put under strict protection.** The EU Commission provides the following definition: forest stands or areas consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too

Large-scale logging site in Penteleu forest incorrectly categorised as "close to nature" logging

Ground photo of so-called "close to nature" forestry resembling clearcut

limited to significantly disturb natural processes.[30] Therefore, the owner should stop all logging works which can further degrade these parcels.

We discovered that in the forest management plan (FMP), the average age was incorrectly set for parcels 12A, 14A and 65A. We suspect that this was done in order to avoid recognising a compact body larger than 20/30 ha, that would have qualified these forests for strict protection. We believe that the owner acted specifically to create the appearance of failure to meet the criteria and indicators for identifying virgin forests and semi-virgin according to OM 3397/2012.

In other forest parcels, a larger quantity of wood was removed than specified in the forest management plan (FMP):

- in parcel 16A, the allowed volume was exceeded by 262 m^3 (31%);
- in parcel 17A, the allowed volume was exceeded by 220 m^3 (45%);
- in parcel 18B, the allowed volume was exceeded by 127 m^3 (26%).

Another issue detected here is the incorrect application of "close to nature" logging. There were many gaps in the forest resembling clearcuts without natural regeneration. Therefore, the remaining forest in these areas no longer has the complex structure of a mixed mature forest.

The passage of heavy machinery during periods of precipitation left deep logging roads behind, thus soil erosion and degradation. According to national legislation, these logging roads should have been filled back at the end of the logging. This has not been done.

Moreover, we observed track marks indicating that heavy machinery moved the wood through the local stream, which is strictly forbidden by national legislation.

National and EU legislation requires that 3 to 5 large biotope trees per hectare are left standing in order to promote biodiversity. In some parcels, no biodiversity trees were left after logging.

Table 5: Protection regime of the forest of Penteleu, Buzău

Forest management	Surface (ha)	Percentage of forest (%)
Intensive wood production T3	1,361.30	87
Moderate interventions T2	191.5	13
Non-intervention T1	**0**	**0.0**
TOTAL	1,552.80	100%

Despite the exceptional conservation value and Natura 2000 protection status of this forest, not even one hectare of this forest is strictly protected. 13% are in moderate protection, where logging operations on a smaller scale are possible. 87% are under an intensive wood production regime.

Location 3: Țibău, Maramureș. Ingka-owned forest on the edge of Maramureș Natural Park

This is an ecologically sensitive forest located in Maramureş county on the edges of the Maramureş Natural Park and in close vicinity to the Munţii Maramureşului Natura 2000 sites. Here we were expecting from the forest owner and administrator, Ingka Investments, a sensible forestry approach focusing on the conservation of the area's natural heritage. Instead, we found new clearcuts which are the most destructive form of commercial logging interventions. These interventions were made in what was already a heavily degraded forest landscape.

In this area, Ingka Investments purchased forests that grow on steep, rocky slopes which were under strict or partial protection in the past. For instance, in parcel 21D, which had an average age of 126 years, no logging was registered before the Ingka takeover in 2020. According to the new Ingka forest management plans (FMP), all these ecologically fragile forests are now managed only for wood production, with no large areas under strict protection. The clear aim of the new FMP is to increase wood production, while ignoring the conservation value of these forests. Therefore, one can conclude that the takeover by Ingka Investments resulted in a considerable decrease in the level of protection of this forest area. The ecological protection functions of this forest (e.g. stabilisation of soils and preventing landslides on steep slopes) were not taken into account in the new forest management plans.

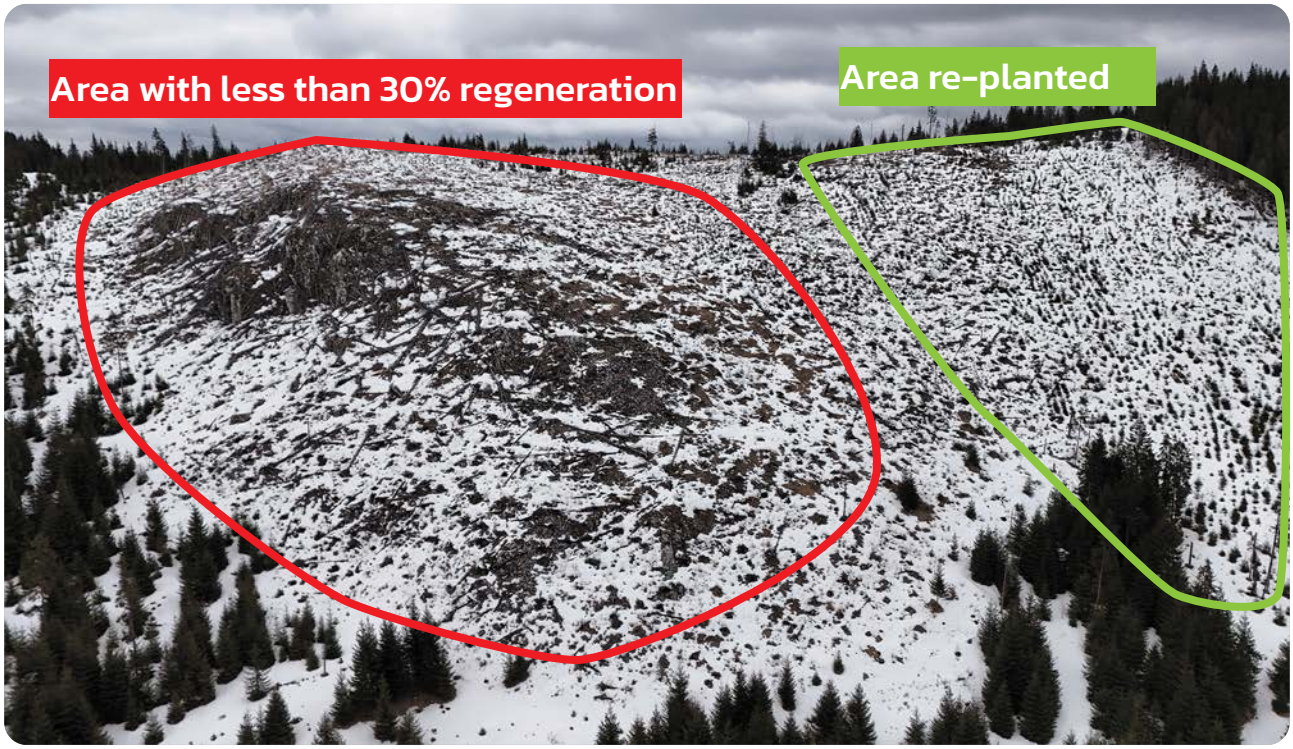
Table 6: Analysis of the forest in Țibău valley, Maramureș

Location name	Țibău, Maramureș
Location GPS	47°39'08.9"N 24°59'07.7"E
Forest owner	Ingka Investments Forest Assets SRL
Forest management plan (FMP)	FMP from 2018 FMP from 2021
Old growth forest	Unknown
Protected area	Buffer zone; on the borders of Maramureș Natural Park and Natura 2000 sites ROSPA0131 and ROSCI0124
Habitats and species examples / Threatened species on IUCN Red List	At least 31 habitats including Luzulo-Fagetum beech forests, Asperulo-Fagetum beech forests, Medio-European limestone beech forests of the *Cephalanthero-Fagion* Species include: *Cypripedium calceolus* (near threatened), *Danube Hucho hucho* (endangered)
Environmental assessment	**Not available at the time of the site visit, in breach of EU Habitats Directive; in progress as of 2024 but not yet approved**
Logging permits	Several logging permits (APVs) including: APV 2200125302110 APV 2100125302300 APV 2200125303340 APV 2100125304810

Type of logging	Clearcuts
Logging active/inactive	Active in 2023
Volume of wood extracted 2021-2023	Over 10,000 m^3
Type of wood extracted	Beech *(Fagus sylvatica)*, spruce *(Picea abies)* and fir *(Pinus sylvestris)*
Suspected breaches of law and bad forest management practices	• number of allowed interventions exceeded in parcel 21D (2 instead of 1) • logging permits not renewed 8 months after expiry in parcel 13A • progressive logging disguised as "close to nature" forestry • traces of heavy machinery passing through the stream • soil degradation caused by heavy machinery passing through during rainy periods • access paths used for timber collection were not levelled, which caused water runoff and erosion in some areas • visible ecosystem degradation • no forest restoration conducted • protection level lowered considerably since Ingka takeover, from strict or partial protection to intensive wood production • no biodiversity trees and dead wood left after logging • poor or missing forestry markings.

Ingka-owned forest in Maramureș, Țibău valley. Degraded parcels 13A, 20D, 21D

Previously cleared forest areas were purchased by Ingka in Maramureș.
No visible forest restoration has been done over the past 3-4 years



Previously reforested area (green) and more recently but ineffectively reforested area (red) by Ingka Investments in Maramureș

Some of these degraded forest areas had been replanted by the previous forest owners 5 to 10 years ago (as shown on the right, in green). However, since the takeover by Ingka in 2020, replanting has slowed significantly and upon our visit in February 2024, we found that only 25-30% of these areas had been reforested (in red).

Forests that developed on steep rocky slopes as the one above, were under full or partial protection in the past 50-60 years. But when Ingka Investments became the new owner, all of these forests were taken out of protection and introduced into commercial wood production.

Suspected breaches of EU and national legislation

The area of Țibău valley, Maramureş, includes forests that have developed on steep, rocky slopes that should have been strictly protected according to national legislation. Instead, the new forest owner, Ingka, ignored their conservation value and their current management plan only seeks wood production here. The construction of new roads and opening of new logging sites in this type of fragile ecosystem can have a significantly negative environmental impact.

In the table below, we examined the historical management of the forests recently purchased by Ingka Investments in 2020. What was shocking to see is that from 1967 to 2020, these forests continuously had areas of strict and partial protection for conservation purposes. However, under the new 2021 Ingka management plan these forests are only used for commercial wood production, a practice that was only considered acceptable here during 1953-1966. We believe that this type of forest management with no consideration for nature conservation has no place in modern forestry. Ingka seems to disagree and the protection status of these ecologically fragile forests was lowered considerably as a result of the Ingka takeover.

3.1.2.1. Evoluția bazelor de amenajare

În tabelele următoare este prezentată evoluția bazelor de amenajare, la diferite nivele, pentru întregile unități de producție din care a provenit unitatea de producție studiată (U.P. XL ȚIBĂU 2).

Tabelul 3.1.2.1.1.

Anul amenajării	Subunități de gospodărire	Regimul	Compoziția-țel	Tratamente	Ciclu
U.P. V Tibău Inferior (O.S. Cărlibaba)					
1953	Codru regulat	codru	100MO	T. rase	100
1967	Codru regulat	codru	90MO 10DR	T. rase parchete mici, T. succesive T. succesive margine de masiv	100
	Protecție absolută	codru	-	T. igienă	-
1978	Codru regulat	codru	80MO 16LA 4PI	T. rase în parchete mici T. succesive	100
	Protecție absolută	codru	-	T. igienă	-

Anul amenajării	Subunități de gospodărire	Regimul	Compoziția-țel	Tratamente	Ciclu
1988	Codru regulat – sortimente obișnuite	codru	85MO 10DR 5DT	T. rase	100
	Conservare deosebită	codru	-	Tăieri de conservare,T. igienă	-
1998	Codru regulat – sortimente obișnuite	codru	10MO	T. rase	100
	Ocrotirea integrală a naturii	codru	-	-	-
	Conservare deosebită	codru	-	Tăieri de conservare, T. igienă	-
2006	Codru regulat – sortimente obișnuite	codru	70MO 20LA 10PAM	T. progresive, T. rase	110
	Ocrotirea integrală a naturii	codru	-		-
	Conservare deosebită	codru	-	Tăieri de conservare, T. igienă	-
U.P. XL ȚIBĂU 2 (Ocolul Silvic INGKA INVESTMENTS S.R.L.)					
2021	Codru regulat – sortimente obișnuite	codru	76MO 19LA 4FA 1BR		100

INGKA

Extracts of forest management plan (FMP) information for the forest in Țibău, Maramureş

Table 7: Protection regime of the Ingka forest in Țibău, Maramureș

Forest management	Surface (ha)	Percentage of forest (%)
Intensive wood production T3+T6	1,335.2	95.4
Moderate interventions T2	57.2	4.1
Non-intervention T1	**6.5**	**0.5**
TOTAL	1,398.9	100%

Only 0.5% of this forest is strictly protected, despite its ecologically fragile status. More worryingly, 95.4% thereof is under intensive wood production.

Location 4: Fetești, Suceava. Ingka-owned forest near protected area

This location caught our interest because of the clearcuts that were authorised in mixed forests. Normally, Romanian legislation exceptionally allows clearcuts only in spruce plantations and forests considered commercially unviable or degraded. Here we suspect that clearcuts were illegally approved in mixed healthy forests in order to justify wood extraction at a much younger age than legally allowed (at 85 instead of 120 years).

We suspect that the clearcuts were incorrectly planned and approved by the firm drawing up the ten-year forest management plan (FMP). Even the new draft Romanian Forest Code[31], currently going through Parliament, recognises the negative impact of clearcuts and aims to strictly forbid this type of forest works in all protected areas of Romania.

Suspected illegal clearcut in Ingka forest near Fetești, Suceava (parcel 37). Audited and approved as respecting FSC standard of sustainable forest management

Suspected illegal clearcuts in Ingka forest near Fetești, Suceava

Table 8: Analysis of the forest near Fetești, Suceava

Location name	Fetești, Suceava
Location GPS	47°42’44.7”N 26°20’11.7”E
Forest owner	Ingka Investments Forest Assets SRL
Forest management plan (FMP)	FMP from 2019
Old-growth forest	No
Protected area	No but near Pădurea Pătrăuți Natura 2000 site ROSCI0075
Habitats and species examples / Threatened species on IUCN Red List	In nearby Pătrăuți forest Natura 2000 site: Dacian oak & hornbeam forests. Species include: Crested newt (*Triturus cristatus*), Greater mouse-eared bat (*Myotis myotis*), Fire-bellied toad (*Bombina bombina*)
Environmental assessment	Not applicable. Not in a protected area
Logging permits	Several logging permits (APV), including: APV 2100125303680 APV 2200125301470 APV 2100125302650
Type of logging	Clearcuts

Logging active/inactive	Active in 2023
Volume of wood extracted 2021-2023	Over 5,000 m^3
Type of wood extracted	Beech (*Fagus sylvatica*), oak (*Quercus robur*), hornbeam (*Carpinus betulus*)
Suspected breaches of law and bad forest management practices	• clearcut allegedly illegally approved in mixed forest • number of interventions exceeded in one parcel • inappropriate works conducted in certain parcels; for instance, we found areas consistent with oak that should have been separated and logged with reduced intensity to allow natural regeneration. • exceeding the inventoried volume per hectare compared to the FMP planning provisions • stand consistency is higher than 0.7, a value wrongly established by the forest planner • no site preparation was carried out before planting • no soil mobilisation works were carried out in existing plantations • low growth and other problems in planted saplings due to lack of works • previous logging recorded in 2013 (sanitary logging); Ingka takeover in 2014 and start of intensive logging.

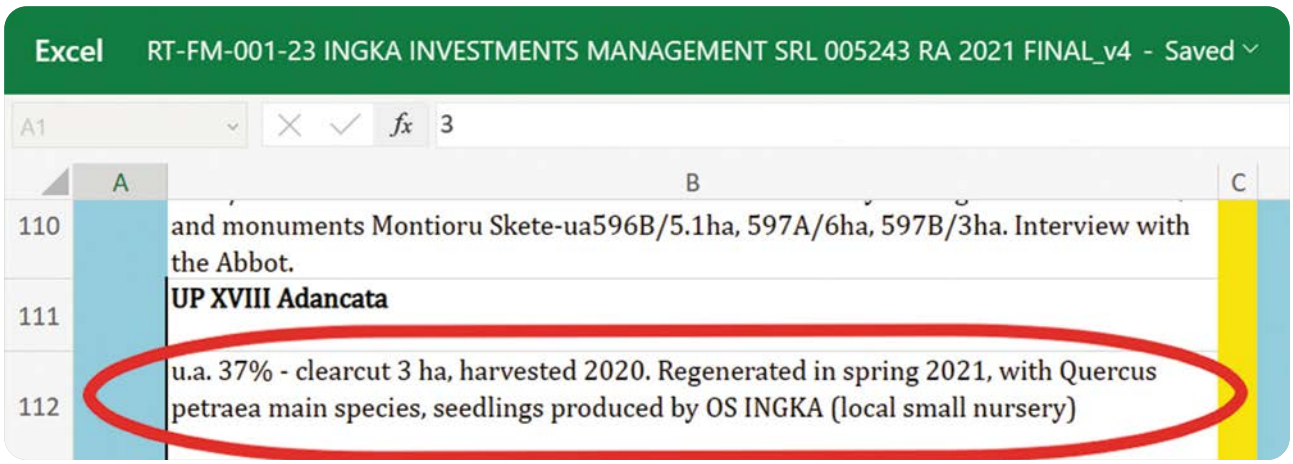
Suspected breaches of EU and national legislation

Our suspicions were confirmed on the ground, where we found a mixed healthy forest with a natural consistency of oak (*Quercus robur*), hornbeam (*Carpinus betulus*), beech (*Fagus sylvatica*), wild cherry (*Prunus avium*), maple (*Acer pseudoplatanus*) and other species. This natural mixed forest with high biodiversity value was deemed unworthy of protection by its owner. It is now in the process of being cleared to the ground and replaced by an orchard-like forest planted in straight rows with low biodiversity value, focusing only on oak and beech trees.

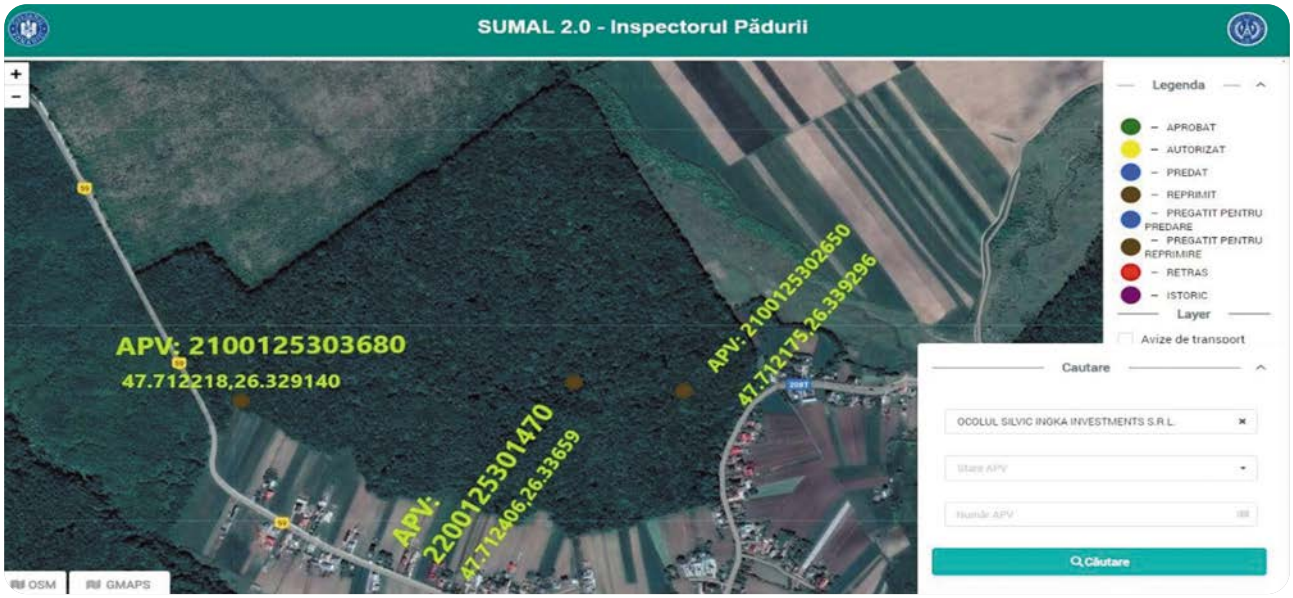
For us, it was shocking to find a healthy, biodiversity rich forest being replaced by a plantation, even if this plantation would be a native oak plantation. This was a forestry practice more common in the communist regime of the 60s and 70s, where the financial benefits of an oak monoculture were encouraged, in the absence of any environmental awareness, yet we were expecting more from a forest owner and administrator in 2023.

One of the cleared forest areas we visited (parcel 37) had been audited against the FSC-FM standard in 2021 by the Soil Association Certification. Not only did the Soil Association auditors not find any problem with this apparent illegal clearcut in mixed healthy forests but they even complimented Ingka for using home-grown oak saplings for replanting. It appears that the FSC system does not have a problem with clearcuts in healthy natural forests.

The FSC audit report from 2021 (RT-FM-001-23) is publicly available on the FSC website.[32]



Extract of FSC audit report for Ingka forest near Fetești, Suceava



Extract from SUMAL wood traceability system on logging permits issued for Ikea-forest near Fetești, Suceava

Table 9: Protection regime of the forest near Fetești, Suceava

Forest management	Surface (ha)	Percentage of forest (%)
Intensive wood production T6	432.60	100%
Moderate interventions T2	**0**	**0**
Non-intervention T1	**0**	**0**
TOTAL	432.60	100%

Not even one hectare of this forest is strictly protected. 100% is under an intensive wood production regime.

Location 5: Cicănești, Argeș. Ingka-owned forest near protected area

This is an area with old forest stands located outside a protected area. It is rapidly being cut down by its owner and administrator, Ingka Investments. There are very deep logging roads everywhere (up to 3-4 m deep) and remnants of old-growth forest towards the top of the hill.

Ingka-owned forest located in Cicănești, Argeș. Centre-right: degraded forest parcel

Ingka-owned forest located in Cicănești, Argeș. Soil erosion

Ingka-owned forest located in Cicănești, Argeș. Degraded forest parcel

Table 10: Analysis of the forest near Cicănești, Argeș

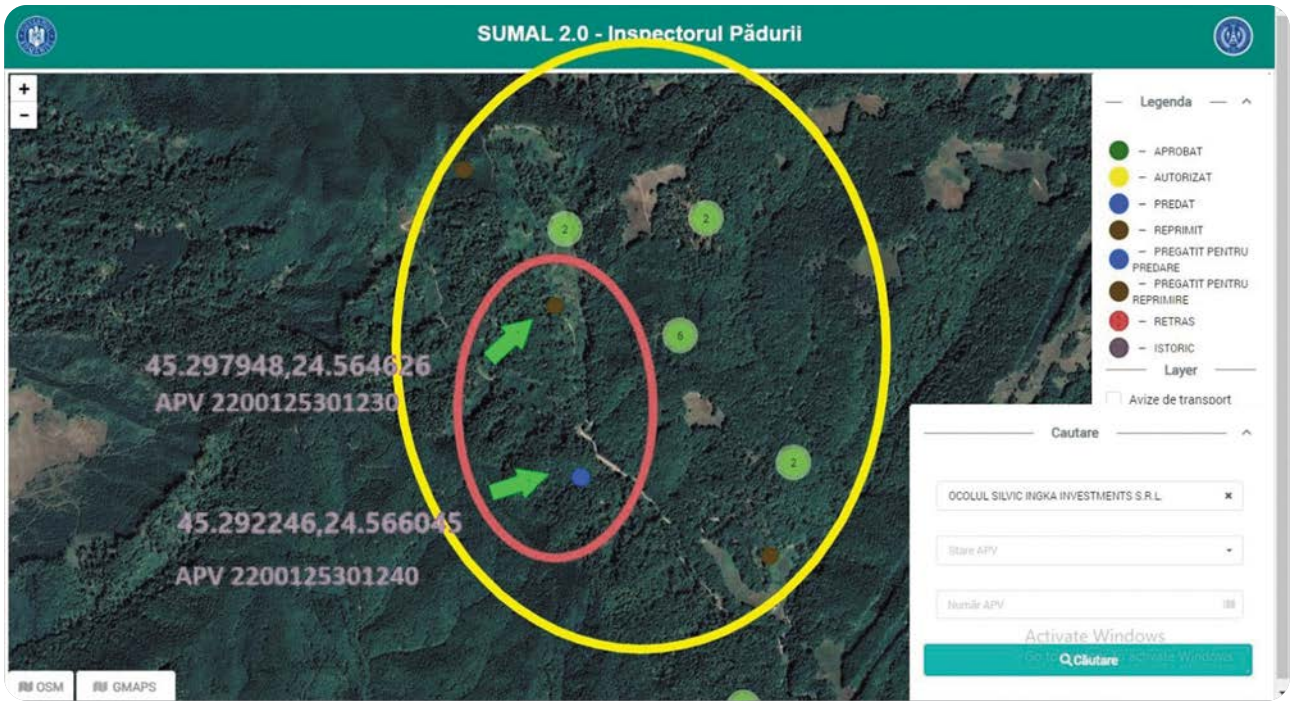
Location name	Cicănești, Argeș
Location GPS	45°17’52.6”N 24°33’52.7”E
Forest owner	Ingka Investments Forest Assets SRL
Forest management plan (FMP)	FMP from 2019
Old growth forest	Potentially
Protected area	No but near Valea Vâlsanului Natura 2000 site ROSCI0268
Habitats and species examples / Threatened species on IUCN Red List	In nearby Valea Vâlsanului Natura 2000 protected area, species include: asprete (*Romanichthys valsanicola*) **critically endangered**; stag neetle (Lucanus cervus) **near threatened**; *Cottus transsilvaniae*; marsh fritillary (*Euphydryas aurinia*)
Environmental assessment	Not applicable. Not in a protected area
Logging permits	Several logging permits (APVs) including: APV 2200125301240 APV 2000125300051 APV 2100125300150 APV 2200125301230
Type of logging	Close to nature and progressive
Logging active/inactive	Active in 2023
Volume of wood extracted 2021-2023	Over 10,000 m^3
Type of wood extracted	Beech (*Fagus sylvatica*), spruce (*Picea abies*) and fir (*Pinus sylvestris*)
Suspected breaches of law and bad forest management practices	• incorrect application of progressive logging with visible degradation of forest ecosystems • due to classification as protection forests, these forests should have been put in category of moderate or no interventions • number of interventions foreseen by FMP has been exceeded in one parcel • soil degradation caused by the use of heavy machinery in periods of heavy rainfall; severe soil erosion up to 3-4m deep • traces of machinery passing through the stream • last autumn no ARN works were observed in the field • biodiversity trees and dead wood were not preserved • poor, unmaintained or missing forestry markings • periodic pollution of the creek due to silt carried by torrents on eroded roads.

Suspected breaches of EU and national legislation

These forests are classified as protection forests for rivers and streams in mountain areas that feed natural lakes and reservoirs (category 1.1.c T4). Because of their classification as protection forests they should have been placed in a category that requires much more moderate logging or no logging, such as 1.5.p T2, old, old-growth and natural forests of special value. However, in the FMP they were intentionally introduced into a commercial exploitation category where logging takes place in the same way as in forests without protection functions. This is in breach with a number of national provisions including the instructions approved by OM 1540/2011 and the technical rules regarding the choice and application of treatments.

In this area, the private forest management unit ("ocol silvic") of Ingka posted, starting with 2021, a number of 22 logging permits (APVs), of which 17 are from logging conducted in old, potentially old-growth forest stands, where the extracted volume exceeds 15,300 m^3. The volume included in only four logging permits was 6,430 m^3 (2,784 trees). In parcel 119A, the management plan only allowed for two interventions per decade, but at least three have been made already, as visible in the Forest inspector application. Parcel 116A had 40% of its forest stand aged 170 years on average and parcel 119A had 40% of its trees aged 160 on average.

On the field, soil erosion and degradation were observed. This is the result of heavy machinery that worked during rainy weather, in breach of national legislation. No levelling was done at the time of the investigation, again in breach of national legislation. Apart from this, not enough dead trees (1-2%) and biodiversity trees (1-3/ha) have been left standing. All in all, intensive mechanised logging in forest areas which should have been at least partly protected are now leading to the overexploitation, degradation and possibly destruction of these forests.



Extract from SUMAL wood traceability system on logging permits issued for Ingka forest near Cicănești, Argeș

Table 11: Protection regime of the forest near Cicănești, Argeș

Forest management	Surface (ha)	Percentage of forest (%)
Intensive wood production T4	804,10	84.66
Moderate interventions T2	145,70	15.34
Non-intervention T1	**0**	**0**
TOTAL	949,80	100%

Not even one hectare of this forest is strictly protected. Only 15.34% is under a moderate protection regime. 84.66% of this forest is under an intensive wood production regime.

Location 6: Ceahlău, Neamț. Ingka-owned forest near Ceahlău National Park

The Ceahlău area is the biggest hotspot of logging permits authorised for Ingka-owned forests. According to the SUMAL wood traceability system, 176 logging permits have been issued for this forest over the past 2-3 years. It was a large area to analyse and required several days to scout.

Parts of this forest area are in close vicinity to the Ceahlău National Park and Ceahlău Massif Natura 2000 sites ROSCI0024 and ROSPA0129. This is also a potential hotspot for old-growth forests. However, most of these forests have been degraded by various logging works over the past 10-20 years. Therefore, we were not able to confirm intact old-growth forests on the ground. Even so, they remain high conservation value (HCV), high biodiversity forests.

We also looked at logging sites further away from the national park and found an area severely degraded by logging outside Bistricioara, from where we present the data below. This was a very difficult location to access because of a road barrier and video cameras.

Degraded forest parcel in the forest near Ceahlău, Neamț

Logs of hundreds years old trees by the forest road near Ceahlău, Neamț

Table 12: Analysis of the forest near Ceahlău, Neamț

Location name	Bistricioara, Ceahlău
Location GPS	47°04'38.2"N 25°54'23.7"E
Forest owner	Ingka Investments Forest Assets SRL
Forest management plan (FMP)	FMP from 2020
Old growth forest	Potentially
Protected area	No, but near Ceahlău National Park and Ceahlău Massif Natura 2000 sites ROSCI0024 and ROSPA0129
Habitats and species examples / Threatened species on IUCN Red List	Habitats include: Tilio-Acerion forests of slopes, screes and ravines, Alluvial forests with Alnus glutinosa and Fraxinus excelsior (*Alno-Padion, Alnion incanae, Salicion albae*), Acidophilous Picea forests of the montane to alpine levels (*Vaccinio-Piceetea*), Alpine Larix decidua and/or Pinus cembra forests, Dacian Beech forests (*Symphyto-Fagion*) Species include: Tengmalm's owl (*Aegolius funereus*) **depleted** EU population, kingfisher (*Alcedo atthis*) **vulnerable**, swift (*Apus apus*) **near threatened** EU population
Environmental / Appropriate Assessment (AA)	**Yes, we found an AA from 2021. However, the assessment was done one year after the start of the FMP, not before, as per EU requirements.**
Logging permits	Several logging permits (APV), including: APV 2200125303180 APV 2000125300381 APV 2100125304510
Type of logging	Close to nature and progressive
Logging active/inactive	Active in 2023
Volume of wood extracted 2021-2023	Over 5,000 m^3
Type of wood extracted	Beech (*Fagus sylvatica*), spruce (*Picea abies*) and fir (*Pinus sylvestris*)
Suspected breaches of law and bad forest management practices	• close to nature and progressive logging resulted in forest degradation • forest stands of 170 years average age opened up to logging • local stream degraded by logging operations • severe soil degradation and erosion (3-4 metres deep forest road) caused by the use of heavy machinery in periods of rainfall; roads not levelled at the end of logging works • soil degradation exacerbated by excessive tractor roads inside forest area • damage to trees not subject to logging.

Suspected breaches of EU and national legislation

Main findings here included severe soil degradation present everywhere in these parcels, caused by the passage of heavy machinery during periods of precipitation. We also found an excessive number of tractor roads inside these parcels that accentuates soil degradation.

At the end of logging works, the access roads used for wood collection were not levelled and some of these eroded roads were 3-4 metres deep, destabilising whole slopes.

Although these forests have been assigned water protection functions, this protection was not visible on the ground; instead we found the local stream blocked by mud and abandoned vegetation, which has the potential to pollute the hydrographic network downstream.

The local stream (with permanent water flow) at the base of the plots was used as an access road for the removal of wood, strongly degrading this fragile habitat. Moreover, the natural bed was adjusted with an excavator and partially blocked by an artificial dam next to the primary platform area.

Numerous trees were damaged in the logging areas and in the vicinity of wood evacuation routes.

Soil erosion on the forest road in Ingka forest near Ceahlău, Neamț

Degraded forest parcel in the forest near Ceahlău, Neamț

Tip Transport: Locul Recoltării

Provenienta: 2200125303180 - P2325_UP31_ua549_Duruitori

Cod Aviz: AP230053480014033514100313 22

Data Emiterii: 03/10/2023 13:22:41

Nr. Identificare Mijloc Transport: NT02ANM

Valabilitate: 03/10/2023 13:22:41 - 03/10/2023 19:22:41

Informații Entități Implicate

Emitent

Transportator

Punct de Descărcare

Denumire: SC PAVIFOREST SRL

CUI: 26055808

Poze Transport

Extract from logging permit for forest near Ceahlău, Neamț, from wood traceability system

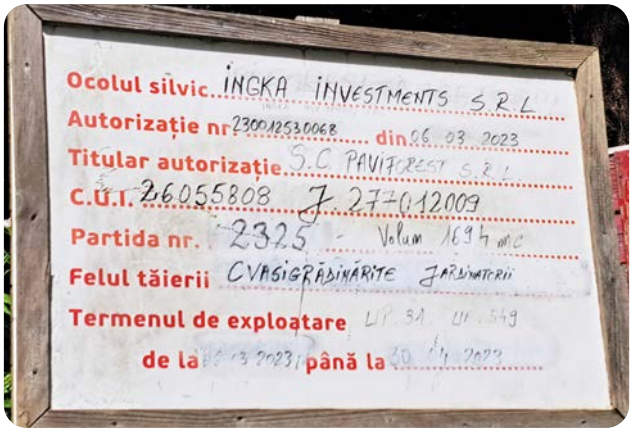
DESCRIEREA STATIUNII SI ARBORETULUI

549 33.9 HA GF.1-1C, SUP:J TS:3333 TP:1311
SOL:3101 Versant ondulat , EXPOZITIE E
INC. 27 G ALTITUDINE: 700-1050 M.
LITIERA:continua - normala TIP FLORA:Asperula-Dentaria
Natural fundamental prod. sup relativ-plurien
COMP.ACTUALA : 7 BR 2 FA 1 MD
COMP.TEL : 4 BR 3 FA 3 MD
SORT:BR Mijlociu,celuloza,constr. VIRSTA EXPL.120 ani
SEM.UTIL: 5BR 4FA 1MD
SUBARBORET:
DATE COMPL. Alte date complement.

POL: ERZ:
LUCRARI EXEC. 2014-T.produse accidentale
2018-T.produse accidentale
LUCRARI PROP. T.CVASIGRADINARITE(jard)
INGRIJIREA SEMINTISULUI

ELM ARB	P R P	M. RE GE	VIR STA ANI	D CM	H M	C L P	AM ES TE	EL AG AJ	PROVE- NIENTA	VI TA LI	DENS CONS	VOLUM MC/ HA	VOLUM MC/ UA	CRES MC/ HA
BR	5	IN	170	56	36	2		.7	RN	N	0.30	282	9560	1.8
BR	2	IN	100	42	30	2	M	.7	RN	N	0.12	113	3831	1.1
FA	1	IN	170	60	34	2	M	.7	RN	N	0.06	62	2102	0.2
FA	1	IN	100	38	29	2	M	.7	RN	N	0.06	60	2034	0.5
MD	1	IN	170	58	37	2	M	.7	RN	N	0.06	64	2170	0.2
TOTAL			170			2					0.60	581	19697	3.8

Extract from the forest management plan (FMP) for the forest near Ceahlău, Neamț, showing how old, valuable forests, aged 170 years on average, are now being degraded by commercial logging approved by Ingka Investments. These types of potentially old growth forests are extremely rare at European level and they should be strictly protected, not destroyed.



Logging panel of Ingka Investments forest near Ceahlău, Neamț

Table 13: Protection regime of the forest near Ceahlău, Neamț

Forest management	Surface (ha)	Percentage of forest (%)
Intensive wood production T3+T4	2,871.70	84.76
Moderate interventions T2	516.40	15.24
Overlap with National Park and Natura 2000 sites, but not fully protected	**837.10**	**24.40**
Non-intervention T1	**0**	**0**
TOTAL	3388.10	100%

Not even one hectare of this forest is strictly protected, although it partially overlaps (24%) with a national park and two Natura 2000 protected areas. Only 15.24% is in a moderate protection regime and 84.76% of this forest is in an intensive wood production regime, including most of the forests from the overlap with Natura 2000 sites.

Location 7: Câmpuri, Vrancea. Ingka-owned forest. Partly Natura 2000 site

We visited this area after having detected large-scale logging areas on satellite images. We were able to confirm recent logging on the ground but on a smaller scale than expected. Also this logging site was partially regenerated meaning that in places the forest looks healthy.

Access to this location was difficult because of muddy roads. We had to walk a few kilometres to reach this location and due to the terrain we only saw a part of this forest.

Table 14: Analysis of the forest near Câmpuri, Vrancea

Location name	Câmpuri, Vrancea
Location GPS	46°00'13.0"N 26°45'39.1"E
Forest owner	Ingka Investments Forest Assets SRL
Forest management plan (FMP)	FMP from 2021
Old growth forest	Yes
Protected area	Partially overlap (3.92%) with Soveja Natura 2000 site ROSCI0395, but not in the area we visited
Habitats and species examples / Threatened species on IUCN Red List	Habitats include: Luzulo-Fagetum beech forests, Asperulo-Fagetum beech forests, Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)*, Dacian Beech forests (*Symphyto-Fagion*), Alpine and Boreal heaths, Degraded raised bogs still capable of natural regeneration Species include the brown bear (*Ursus arctos*), *Rosalia alpina*, greater mouse-eared bat (*Myotis myotis*)

Environmental / Appropriate Assessment (AA)	**Not available at the time of the site visit**
Logging permits	APV 2100125304540 APV 2200125302990
Type of logging	Progressive and conservation logging
Logging active/inactive	Active in 2023
Volume of wood extracted 2021-2023	Over 2,500 m^3
Type of wood extracted	Beech (*Fagus sylvatica*), spruce (*Picea abies*) and fir (*Pinus sylvestris*)
Suspected breaches of law and bad forest management practices	• conditions of exploitation specific to the protected natural area Soveja Natura 2000 site not respected • parcel 8F was downgraded by choosing the lower average age for the whole parcel • no biodiversity trees and dead wood were preserved • severe soil degradation caused by the use of heavy machinery in periods of rainfall; roads not levelled at the end of logging works • soil degradation exacerbated by excessive tractor roads inside forest area • soil degradation slowing down species regeneration • damage to trees not subject to logging.

Degraded forest parcel in the forest near Câmpuri, Vrancea

Degraded forest parcel in the forest near Câmpuri, Vrancea

Degraded forest parcel in the forest near Câmpuri, Vrancea

Degraded forest parcel in the forest near Câmpuri, Vrancea

Stump of hundreds years old tree in the forest near Câmpuri, Vrancea

INGKA INVESTMENTS FOREST ASSETS ***U.P. V CÂMPURI-PANCIU***

8 F 14.94 HA GF: 1 - 2L SUP: A TS: 5242 TP: 4214
SOL: 3101 Versant mijlociu ondulat EXPOZITIE: NE
INC: 22 G ALTITUDINE: 350 - 500 M
LITIERA: intrerupta-subtire TIP FLORA: Asperula-Asarum
Natural fundamental prod. mij. relativ-echien
COMP.ACTUALA: 10 FA
COMP.TEL: 8FA 2 DT
SORT: FA Gros si mijl.,cherestea VARSTA EXPL.: 110 ani

SEM.UTIL: 8FA 2 DT 10 ani 0.9S mixt
SUBARBORET:
DATE COMPL.: Alunecare slaba Alte date complement.

POL: ERZ:
LUCRARI EXEC.: 2016-T.progresive(punere lumina)
2019-T.progresive(insam,p lum)
LUCRARI PROP.: T.PROGRESIVE(racordare)IMPAD
INGRIJIREA SEMINTISULUI

ELM ARB	PRP	MRE GE	VARSTA ANI	DM CM	HM M	CLP	AMES TEC	ELAG AJ	PROVENIENTA	VITALI	DENS CONS	VOLUM MC/HA	VOLUM MC/UA	CRES MC/HA
FA	3	IN	165	56	24	3	M	.6	RN	N	0.09	32	478	0.2
FA	7	IN	135	46	24	3		.6	RN	N	0.21	74	1106	0.7
TOTAL			135			3					0.3	106	1584	0.9

Extract from forest management plan (FMP) for the forest near Câmpuri, Vrancea

Suspected breaches of EU and national legislation

Our findings here included severe soil degradation present on the edges of these parcels, caused by the passage of heavy machinery during periods of precipitation. We also found an excessive number of tractor roads inside these parcels that accentuates soil degradation.

At the end of logging works, the access roads used for wood collection were not levelled and some of these eroded roads were 1-2 metres deep, destabilising whole slopes.

Species regeneration is slow in parts of forest parcels where the soil was heavily damaged by machinery and logging roads. In addition, numerous trees were damaged in the logging areas and in the vicinity of wood evacuation routes.

Table 15: Protection regime of the forest near Câmpuri, Vrancea

Forest management	Surface (ha)	Percentage of forest (%)
Intensive wood production T3+T4+T6	3,233.00	86.44
Moderate interventions T2	506.98	13.56
Overlap with Natura 2000 sites but not protected	**146.52**	**3.92**
Non-intervention T1	**0**	**0**
TOTAL	3,739.98	100%

Not even one hectare of this forest is strictly protected, although it partially overlaps (3.92%) with Natura 2000 sites. Only 13.56% are in a moderate protection regime (T2) and 86.44% of this forest is in an intensive wood production regime (T3 , T4, T6).

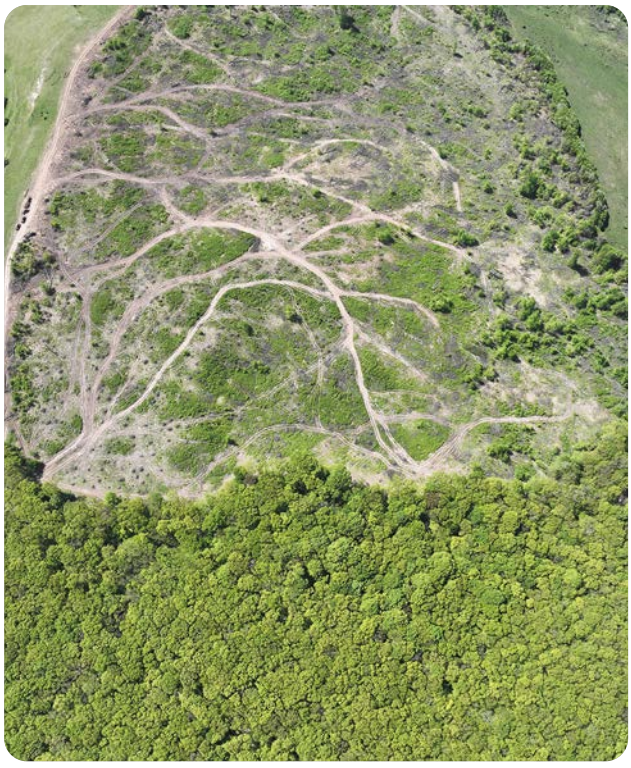
3.2 Ikea supply forests, not owned by Ingka

Location 8: Vecerd, Sibiu. Forest linked to IKEA supply chain. Natura 2000 site

This is a public forest managed by Romsilva, the National Forest Administrator. The company logging in this forest is Silva Group SRL. Silva Group's main wood depot is located in Tălmaciu, south of Sibiu city. Most of the registered wood shipments entering this facility are oak (round wood) coming directly from the forest. Approximately 70% of this wood comes from Natura 2000 protected areas located in the hilly area to the northeast. The Aviva factory producing furniture for IKEA is a major recipient of full oak logs from this facility. As of 2005-2010, Aviva was "Europe's largest producer of solid oak kitchen worktops" and the "world's 1st high volume factory dedicated to engineered kitchen worktops." Aviva produces solid oak kitchen worktops, kitchen islands and tables for IKEA.[33]

This forest is part of the Podişul Hârtibaciului Natura 2000 site which is home to threatened species included on the IUCN Red List. They should be protected according to EU and national legislation.[34]

Cleared forest area near Vecerd, Sibiu. Forest feeding IKEA supply chain



Cleared forest area near Vecerd, Sibiu.
Forest feeding IKEA supply chain

Deep capillarity of soil caused by drought after forest area was cleared near Vecerd, Sibiu

Table 16: Analysis of the forest near Vecerd, Sibiu

Location name	Vecerd, Sibiu
Location GPS	45°58'14.8"N 24°26'28.1"E
Forest owner	Romanian state; public forest managed by Romsilva
Forest management plan (FMP)	FMP from 2014
Old growth forest	No
Protected area	Yes, Podişul Hârtibaciului Natura 2000 site ROSPA0099
Habitats and species examples / Threatened species on IUCN Red List	At least ten threatened European bird species: corncrake (*Crex crex*), lesser spotted eagle (*Aquila pomarina*), European honey-buzzard (*Pernis apivorus*), Ural owl (*Strix uralensis*), European nightjar (*Caprimulgus europaeus*), middle spotted woodpecker (*Dendrocopos medius*), Syrian woodpecker (*Dendrocopos syriacus*), grey-faced woodpecker (*Picus canus*), woodlark (*Lullula arborea*), red-backed shrike (*Lanius collurio*)
Environmental / Appropriate Assessment (AA)	**Not available at the time of the site visit, in breach of EU Habitats Directive**
Logging permits	APV 2200069100960
Type of logging	Progressive
Logging active/inactive	Active in 2023
Volume of wood extracted 2021-2023	5,373 m^3
Type of wood extracted	Mostly oak (*Quercus petraea, Quercus robur*)
Suspected breaches of law and bad forest management practices	• appropriate assessment (AA) not performed before logging • conditions of exploitation specific to the protected natural area ROSPA0099 Podişul Hârtibaciului were not respected • visible degradation of habitats and endangerment of species • progressive logging was incorrectly applied because it did not result in natural regeneration at the required values; the result has the appearance of a clearcut on the ground • soil erosion and deterioration caused by the use of heavy machinery in periods of rainfall • logging permit APV 2200069101240 was reopened in SUMAL five months after the expiry of the authorised exploitation period • no biodiversity trees and dead wood were left after logging • non-compliant transport notices issued from logging sites • no RNA works in the second half of past year observed • damaged trees adjacent to logging sites and evacuation routes • access paths used to collect wood have not been levelled • poor landscape markings, missing silvicultural markings.

Location 9: Vard, Sibiu. Forest linked to IKEA supply chain. Natura 2000 site

The progressive logging conducted in this old forest stand looks like a clearcut on the ground. The way this forest "treatment" was implemented here resulted in a large forest area being cleared to the ground, with considerable impacts on habitats and species and little chance of natural regeneration.

This forest, just as the location in Vecerd, is also part of the Podişul Hârtibaciului Natura 2000 site which is home to threatened species included on the IUCN Red List. They should be protected according to the EU Birds Directive and national legislation.[35] This location was also partially logged by SILVA GRUP SRL (APV 2100069100470), a main supplier to the Aviva factory which makes final products for Ikea.

Cleared forest area near Vard, Sibiu. This forest is part of Podişul Hârtibaciului Natura 2000 protected area harbouring threatened species

Ground view of cleared forest area near Vard, Sibiu. Natura 2000 protected area

Table 17: Analysis of the forest near Vard, Sibiu

Location name	Vard, Sibiu
Location GPS	45°56'22.9"N 24°35'04.5"E
Forest owner	Romanian state; public forest managed by Romsilva
Forest management plan (FMP)	FMP from 2014
Old growth forest	Yes
Protected area	Yes, Podişul Hârtibaciului Natura 2000 site ROSPA0099
Habitats and species examples / Threatened species on IUCN Red List	**Threatened European bird species:** corncrake (*Crex crex*), lesser spotted eagle (*Aquila pomarina*), European honey-buzzard (*Pernis apivorus*), Ural owl (*Strix uralensis*), European nightjar (*Caprimulgus europaeus*), middle spotted woodpecker (*Dendrocopos medius*), Syrian woodpecker (D*endrocopos syriacus*), grey-faced woodpecker (*Picus canus*), woodlark (*Lullula arborea*), red-backed shrike (*Lanius collurio*); Lapwing (*Vanellus vanellus*) **vulnerable** IUCN, *threatened* EU population status; Wood Sandpiper (*Tringa glareola*) **depleted** EU population status
Environmental / Appropriate Assessment (AA)	**Not available at the time of the site visit, in breach of EU Habitats Directive**
Logging permits	APV 2200069101240 APV 2100069100470 APV 2100069101790
Type of logging	Progressive
Logging active/inactive	Active in 2023
Volume of wood extracted 2021-2023	5,450 m^3
Type of wood extracted	Beech (*Fagus sylvatica*), spruce (*Picea abies*) and fir (*Pinus sylvestris*)
Suspected breaches of law and bad forest management practices	• appropriate assessment (AA) not performed before logging • incorrect application of progressive logging; on the ground it looks like a forest that has been clearcut • failed natural regeneration after progressive logging • habitats and species are seriously affected • no dead wood and biodiversity trees left after logging • conditions of exploitation specific to the Natura 2000 protected area were not respected; the main goal pursued was the extraction of high quality wood.

Ground view of cleared forest area near Vard, Sibiu. Natura 2000 protected area

Various wood deposits owned or associated with Ikea supply chains

Ingka-owned deposit in Iaşi county. Low grade wood from nearby Ingka forests comes here after which it gets distributed to various local markets and sold as firewood

Iris factory in Miercurea Ciuc producing for Ikea (SC IRIS Service Ciuc SA). We tracked a few wood shipments (mostly oak) from the Ingka forests in Iaşi county coming directly to this factory

Silva deposit in Talmaciu (SILVA GRUP SRL). Connected to oak forests such as Vecerd and supplying Aviva factory which makes final products for Ikea

4. Confronting IKEA

In May 2023, the Bruno Manser Fonds (BMF) and Agent Green sent a letter of concern to the Chief Executive Officer (CEO) of the Ingka Group and the CEO and Chief Sustainability Officer (CSO) of IKEA Switzerland (Annex 2). In this letter, we explained our concerns over the destructive logging and bad forest management practices[36] Agent Green had documented in one of Ingka Investments' own forests in the Penteleu massif, Buzău county, Romania. This forest area still includes vast parcels which can be characterised as high conservation value (HCV) with average tree ages of up to 180 years, and it overlaps with a Natura 2000 protected area. In response to our letter, the Ingka Group Press Office made the following statements:

- *"At Ingka Investments, our main priority as forest owners is to ensure responsible forest management of all our properties to protect the forest, environment, and biodiversity for many generations to come. We do this by taking a long-term approach that respects the law, sets a high standard, and remains transparent.*

- *Under no circumstances do we allow irresponsible or illegal forestry practices. This has been confirmed by multiple third-party assessments. Soil Association Certification Ltd. on behalf of the FSC® (FSC-C131270), for example, conducted an assessment in response to the 2021 allegations by Agent Green. This assessment, where Agent Green representatives accompanied the assessors to the field, found no evidence of wrongdoing. In addition to this, an audit of the Soil Association's assessment was conducted by ASI, verifying the findings by the Soil Association.*

- *As to the more recent claims by Agent Green and Bruno Manser Fonds, Ingka Investments always harvest less than the forests have naturally grown. The total amount of wood harvested on the Penteleu site from 2016-2022 was 42% of the natural growth, and less than half of what was permitted.*

- *Our Forest Management Plans have been assessed with regards to any potential environmental impact and approved by the relevant authorities. Once the plans have been approved, we also notify the Natura 2000 site administrators and invite them to join us in our field works and provide feedback and specific measures, which is then incorporated into the activities we implement in the field. In further complying with the Natura 2000 conservation values, we are consulting with a multi-disciplinary experts team, consisting of biologists, ornithologists, mammal experts and more, to periodically monitor the impact of our activities and seek to implement mitigation measures.*

- *We would like to emphasise that Ingka Investments does not own any property with virgin or quasi-virgin forest in any of the countries where we own forestland, including Romania. This has been verified independently by environmental NGOs, the Ministry of Forestry, and scientific surveys on our property. We also have zero tolerance to deforestation. We ensure proper regeneration of all the plots where we conduct harvesting.*

- *We always follow the national regulations and legal requirements wherever Ingka Investments manages forests, including all EU directives. In addition, we go beyond legal obligations, meeting the requirements needed for FSC certification and initiating regular audits by independent authorities. Our Forest Management Plans and other documents are publicly available, and each year we personally invite more than 1500 national authorities, NGOs, and other stakeholders to comment.*

- *We apply responsible and strict management measures that will preserve and even increase the quality of the forest, environment, and biodiversity over time. We want to preserve this equilibrium, as we think this is the way that leads us to a sustainable use of resources in the long term.*

- *We work diligently and transparently on a daily basis to take responsibility for people and the planet. Our commitment to become a circular and climate positive business by 2030 remains."*

In the following we address each of the arguments used in the response to our letter.

Certification

Recent analyses have shown that forest certification systems as market-based mechanisms which have consistently failed to achieve their goals. It seems that the audits conducted by certification bodies are simply not effective or sufficient to ensure that sustainability on paper matches the situation on the ground. This applies in particular to corruption-rife and high-risk countries such as Romania. This is linked to conflicts of interest and lack of effectiveness of independent assurance services. For instance, certification bodies are paid by the very companies whose compliance with the standards they need to verify.

A recent cross-border investigation led by the International Consortium of Investigative Journalists (ICIJ) found that auditors and certification firms validate products linked to deforestation "with alarming frequency" due to largely unregulated environmental auditing and other issues. The analysis identified 48 auditing firms that had verified practices of companies in the forest products industry and had declared them as sustainable, although these companies had committed law violations such as logging in indigenous forestland and protected reserves, using false permits and importing illegally harvested timber. [37]

Particularly the FSC audits of Ingka-owned forests in Romania appear to be very superficial considering the size and distribution of IKEA forests: over 50,000 ha in 43 different areas. For example, in 2021 audits in Ingka forests in Romania lasted only 5 days, in which the FSC team needed to conduct meetings, interviews, inspection of complex documentation, office audit, field trips to the forests, recording of findings, etc. Given that the 74 plots audited in 2021 were distributed over 7 counties of Romania (BZ, VN, MM, SV, IS, AB, VS), we deduce that the time allocated was completely insufficient to visit all the forest locations and we consider that the FSC checks were based mainly on office records and not on forests visits for all locations.[38] In one example, the FSC auditors reported auditing 3 large forest areas in 3 different counties in just one day (on 5.11.2021) in Vrancea, Suceava and Maramureș. We calculated that just the travelling time in between these locations would have taken the whole day, making it extremely unlikely that the auditors had time to also see forest locations. Instead the auditors declared that in one day they visited approximately 20 forest parcels, conducted several interviews, checked office papers and travelled around 9 hours in between these locations.

Natural growth

The company may harvest less wood than the annual natural forest growth, however this indicator does not provide any information on the state of the forests that have been subject to logging, be they Ingka-owned or just feeding the Ikea supply chain. Our investigation findings clearly show that many of these forests have been severely degraded or even cleared over large areas as a result of the intensive commercial logging and unsustainable forest practices of the logging companies. In Ingka Investments' forests, these are its subcontractors and the company is fully responsible for their actions. As the forest owner and administrator, Ingka Investments has a legal responsibility to ensure that forest habitats are protected and that any damage to vegetation or soils are prevented or restored at the end of the logging. This was not the case in many of the locations visited, where we identified habitat degradation caused by logging that was not restored at the end of the logging period.

Forest Management Plans (FMPs)

FMPs in Romania generally prioritise logging over nature conservation, they do not take into account forests' protective roles and ecosystem services, and are often flawed as they underestimate the quantity, quality and other features of trees standing in the forest (e.g. tree species, number of trees, quality class, diameter, height).[39] As a result, logging permits based on these FMPs contain highly underestimated timber data and the primary beneficiary (e.g. economic operator, forest owner, forest manager) owns quantities and qualities far higher than those declared in the official documents. The surplus is often logged and transported illegally using various 'methods of theft' as documented and described in the Agent Green report from October 2022. [40]

Leaving aside these widespread issues in Romania,

the present investigation reveals a series of errors in the FMPs of the examined forest areas. According to Romanian legislation, Ingka Investments, as a forest owner and administrator, had the obligation to report these errors to the competent authorities. Instead, it kept silent and maybe even used some of them in its favour, in order to maximise the volume of wood harvested from its own forests. Furthermore, it needs to be noted that although in Romania FMPs are drawn up by specialised firms, forest owners do participate in this process and have the power to impose their own forest management objectives. They are the owners of the FMPs they implement, and if these plans contain errors, they must notice and report them - if not at the reception of the forest management plans, then at the latest at the moment of their implementation.

Virgin or quasi-virgin forests

Ingka Investments claim that they do not own any property with "virgin or quasi-virgin forest" as defined by Romanian legislation. According to our analysis, some of their forests, such as the one in the Penteleu Natura 2000 site, do contain pockets of primary and old-growth forests which are now degraded by logging. So far, Ingka has failed to identify and protect these forests. Moreover, Ingka does own (and sources wood from) forests located in natural protected areas such as Natura 2000 sites, some of which may still be old-growth forests. These forest stands still exhibit high biodiversity value, their habitats still harbour rare or endangered species, and therefore some of these forests should be strictly protected and, only where necessary, logged in a sustainable close-to-nature manner.

To determine whether Ingka Investments still owns any old-growth forests in Romania, one could conduct an analysis of all old-growth parcels on their property, especially those that have had no or only minor interventions over the past 30 years, which is an indicator of potential primary forests. It also needs to be mentioned that none of the visited forest areas which overlapped with Natura 2000 sites were declared as Natura 2000 by Ingka Investments, neither on the on-site information panels, nor in any other way.

Legality

In Romania "simply" respecting national legislation is clearly not enough to ensure forest protection. This is due to the problematic law enforcement but also because certain provisions are not aligned with EU conservation goals. For example, recent analyses revealed that most of the management plans of forests located in Romania's Natura 2000 sites still lacked environmental assessments called Appropriate Assessments (AAs), although these assessments are mandatory under EU law and are used, among other things, to evaluate the impact of logging operations on protected habitats and species. But even if AAs were conducted, national provisions still consider highly damaging types of logging such as progressive logging to align with nature conservation objectives.

Moreover, under the EU Regulation on deforestation-free supply chains 2023/1115 (EUDR), Romania has the obligation to prevent companies from placing relevant products (including wood and derived products) on the EU market, unless they are: 'deforestation-free'; produced in accordance with the relevant legislation of the country of production; and covered by a due diligence statement indicating no more than a negligible risk of non-compliance. Unlike the previous EU Timber Regulation (EUTR), the EUDR also targets logging that is legal in accordance with the laws of the country of production but still results in deforestation or forest degradation[41], just like the commercial logging currently conducted in some of the forestlands that Ingka Investments owns or sources wood from.

Where does the wood go? Example Switzerland

Despite IKEA's comprehensive wood control system, tracing wood from forests to IKEA stores has been described as an "impossible challenge".[42] It has been reported that IKEA keeps a good overview of its wood origin internally, while externally this origin is increasingly difficult to trace and blurred as the wood moves through the different links of the supply chain.[43] In 2019, the Bruno Manser Fund (BMF) reported IKEA in Switzerland to the Swiss Federal Department of Economic Affairs, Education and Research for systematic violations of the wood declaration obligation that had been in force since 2012.[44] Upon analysis of IKEA's range of solid wood dining tables and chairs in five IKEA stores, BMF had found that in over 80 cases, IKEA did not declare the type and origin of wood or did so in an improper manner, for instance by providing misleading designations of origin such as "North and South America, Europe, India, Oceania". BMF demanded that IKEA and its managers be fined for violating the Swiss Consumer Information Act and the Ordinance on the Declaration of Wood and Wood Products,[45] but IKEA got away without a fine and eventually adjusted its practices.

In December 2023, BMF conducted a new analysis of a selection of IKEA's range of solid wood dining tables and chairs and an analysis of a selection of products containing wood from Romania in two IKEA stores in Switzerland, Pratteln and Spreitenbach. The analysis included 9 dining tables, 9 chairs and 5 other products with main elements of massive wood which fall under the scope of the Swiss Ordinance on the Declaration of Wood and Wood Products (Swiss Wood Declaration Ordinance).

Regarding the selected dining tables and chairs, including those produced in Romania, BMF has come to the following results:

3 OUT OF 9 CHAIRS HAVE NO DECLARATION AT ALL IN ONE OF THE STORES

Thus, 66.6% of the chairs are declared in both stores; all tables are declared in both stores.

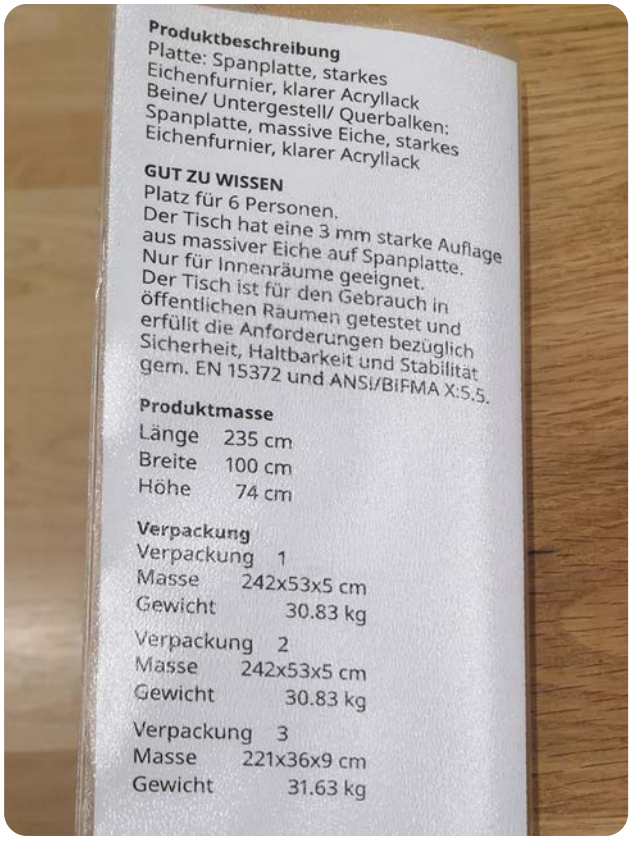
88.8% OF THE PRODUCTS DECLARED IN AT LEAST ONE STORE CONTAIN TOO ROUGH WOOD ORIGIN INFORMATION

Such as "South America, Eastern Europe, Scandinavia, New Zealand, Iberian Peninsula, Baltic States, Western Europe"

100% OF THE ANALYSED PRODUCTS ARE INCONSISTENTLY DECLARED

There are differences between the information provided in stores and online.

Example: Table Möckelby



WOOD DECLARATION IKEA ONLINE:

Table beech (*Fagus sylvatica*)**. Country of felling. Origin:** Slovakia, Slovenia

Table birch (*Betula pendula*)**. Country of felling. Origin:** Lithuania, Russia

Table oak (*Quercus petraea, Quercus robur, Querqus frainetto***); Country of felling. Origin: Romania**

WOOD DECLARATION IKEA STORE PRATTELN:

Oak: Western Europe, Eastern Europe, USA, Spain, Lithuania, Balkans, Italy

WOOD DECLARATION IKEA STORE SPREITENBACH:

Oak: Western Europe, Eastern Europe, USA, Spain, Lithuania, Balkans, Italy

According to the Swiss Ordinance on the Declaration of Wood and Wood Products (SR 944-021), if the wood cannot be clearly assigned to one country of origin, several possible countries of origin may be indicated. If more than five countries of origin are possible, the smallest possible geographical area from which the wood originates may be indicated.

5. Conclusions

The findings presented in this report show that **IKEA, through Ingka Investments, contributes to the rapid degradation of Romania's forests, including old-growth and other high conservation value (HCV) forests. Our investigation identified more than 50 suspected breaches of Romanian or EU law and bad forestry practices with serious impacts on habitats and species. These findings indicate that we are not dealing with isolated cases but with a consistent pattern of destructive logging.** This pattern is visible in all the forests we visited, be they Ingka property or forests feeding the IKEA supply chain. Clearly, it shows that IKEA and the Ingka Group respect neither the EU nature conservation and climate policies, nor their own declared sustainability standards. Instead, they appear to be systematically taking advantage of existing loopholes and grey areas in the Romanian legislation and of its problematic enforcement, in order to maximise wood extraction. **As the largest buyer and retailer of wood in the world and Romania's largest private forest owner with ca. 51,000 ha of forest, IKEA / Ingka Investments should know better.**

Our main findings are based on field investigations of nine selected forest areas, and three connected wood processing facilities, as well as an in-depth analysis of the related forest management plans (FMP) and other official documents. Seven of the selected forest areas are Ingka-owned forests and two are forests connected to the IKEA supply chain. In all the analysed forests, we found evidence of intensive commercial logging, mostly through progressive logging, which left behind severely degraded forest ecosystems, including in HCV forests located in protected areas. We have documented extreme examples of soil degradation and erosion often observed on barren landscapes with little to no forest regeneration.

The forest management plan (FMP) analysis revealed the fact that the related FMPs generally focus on commercial logging with little consideration for nature conservation. **The FMPs of the seven visited Ingka-owned forests cover an area of more than 14,300 ha accounting for 28% of the total declared Ingka forests in Romania. Shockingly, only 0.05% of this vast forestland is under a strict protection regime. Furthermore, six of the seven management plans contain absolutely no forest under strict protection.** Not even one hectare was found to be in strict protection out of almost 13,000 hectares representing the following six Ingka-owned areas from the counties of Iași, Buzău, Vrancea, Suceava, Neamț and Argeș. Only 9.96% of these areas were under partial protection or moderate interventions regimes, amounting to 1,433 ha. Indeed, **nearly 90% of the Ingka Investments properties analysed are under an intensive wood production regime, despite the fact that most of them are overlapping with or are located in the vicinity of natural protected areas such as Natura 2000 sites, national and natural parks. Overall, from the total of 51,335.49 ha owned by Ingka Investments in Romania (99% forest) only 1.04% are under a strict protection (non-intervention) regime and 8.25% are under partial protection.**

This situation is clearly not in line with the EU Biodiversity Strategy for 2030 and the upcoming Nature Restoration Law. Under the Biodiversity Strategy, the EU member states committed to legally protect a minimum of 30% of both Europe's land and sea by 2030, of which 10% will need to be strictly protected. **One key goal is to strictly protect all remaining primary or old-growth forests in the EU (not just virgin forests in a narrow sense), while increasing the quantity, quality and resilience of all forests in the EU.** The Nature Restoration Law is also a key policy instrument to reach the EU carbon sinks goal[46] and achieve climate neutrality by 2050. Through its consistent pattern of destructive logging, IKEA is contributing to the degradation of Romania's forests and to compromising the achievement of these goals by Romania. It should be noted that **as a forest owner and administrator, Ingka Investments is directly responsible for what happens in its own forests. We suspect that the detected bad forestry practices and potential law violations are the result of a lack of oversight, lack of investment, insufficient monitoring by Ingka and misleading information on its sustainability credentials by IKEA.**

More specifically, during our field investigations in forests owned by Ingka Investments in Romania, we documented a number of suspected misconducts in forest management. These represent in our opinion violations of national legislation, forestry

planning and certification standards. They clearly contribute to forest degradation by negatively affecting the forest's characteristics, notably its continuity, typicality, naturalness, diversity, endurance, ecosystem functions and heritage value. **Complaints on the suspected misconducts found in the visited Ingka forests were submitted to the competent Forest Guards of Cluj, Focșani, Suceava and Vâlcea. The alleged misconducts include serious issues such as:**

- incorrect application of different logging types (e.g. progressive logging) with highly damaging consequences, e.g. post-logging forest regeneration not succeeding as it should;
- logging permits exceeding the inventoried volume per hectare compared to planning provisions (FMP) as well as other alleged illegalities related to logging permits;
- soil degradation caused by the passage of heavy machinery during rainy periods;
- non-compliance with exploitation conditions specific to protected natural areas;
- certain forest areas could have qualified for inclusion in the national catalogue of virgin and quasi-virgin forests; instead, they were logged and disqualified from protection;
- traces of heavy machinery passing through streams;
- no biodiversity (old) trees and dead wood left after logging;
- visible degradation of habitats and endangerment of species.

Considering these findings, the authors of this report urge IKEA and the Ingka Group to:

- **practice what they preach, so that the "planet positive" image actually matches reality on the ground in all forests they own or source wood from. In Romania, this means strictly and effectively controlling the conduct of their subcontractors and suppliers to put an end to the ongoing destructive logging and bad forest management practices;**
- **immediately halt intensive commercial logging in all owned forests that are located within or near protected areas such as Natura 2000 sites, national and natural parks;**
- **strictly protect (T1 functional type according to Romanian law) at least 10% of their forest property in Romania; perform only close-to-nature forestry (T2) in 20% and selective logging (T3) in the remaining 70%. This should ensure compliance with national laws, EU nature laws and the FSC standard;**
- **strictly protect the entire forest body at Țibău, an Ingka property that overlaps with the proposed area to establish the future Bucovina Peace National Park;**
- **ensure full traceability of all wood used in IKEA products worldwide, be it massive wood or composites. Only in this way can IKEA guarantee that the wood in its products is free of deforestation and forest degradation;**
- **not accept in its supply chain any wood coming from national or natural parks;**
- **allow independent forest monitoring by civil society and investigative journalists. Involving civil society organisations and independent media in the monitoring process of its own forests (e.g. audits alongside certification bodies) would help to ensure that sustainability standards are correctly implemented and actually meet their goals.**

We call on IKEA to use its weight to help address issues such as corruption and insufficient forest monitoring, in order to change forestry for the better in Romania. **As a company with total revenues of EUR 29.1 billion and a net profit of EUR 1.6 billion in the financial year 2023,**[47] **the Inter IKEA Group carries a special responsibility. It ought to set a clear and strong example of respecting and even going beyond legal obligations and sustainability standards in the forestry sector**, especially in high illegal logging risk countries like Romania.

Glossary

APV (act de punere în valoare): Logging permit according to Romanian legislation. In Romania, the documents proving the legal wood origin are: the logging permit (APV), the accompanying document, the customs import declaration, the intra-Community documents, and the wood material entry-exit register.[48]

ARN works: works meant to aid natural regeneration ("ajutorarea regenerării naturale") by taking care of naturally produced seedlings and in some cases facilitating their emergence (germination).

Close to nature forestry: Replacing clearcuts with lighter but more frequent harvestings, and allowing forests to naturally regenerate rather than transforming them into mono-species plantations. Such an approach can only be considered close-to-nature if it does not decrease the biodiversity of the forests. For example, in old-growth and primary forests it should not be intervened at all. Close-to-nature forestry maintains the integrity, heterogeneity and complexity of forest ecosystems, while producing high-value wood and a steady income. [49]

Forest Inspector: application available in Romania, in which any interested person can access the data from SUMAL wood traceability system in real time and check the legality of wood transports.

Forest management types: called functional types in Romanian legislation. According to the technical rules of Romanian law, forests are integrated into groups, subgroups and functional categories. Each subcategory has a functional type (T1, T2, T3...) indicating its protection level and other functions, e.g. economic.[50] Functional type T1 includes forests with special nature conservation functions, for which, by law, any kind of logging is prohibited. T1 forests are scientific reserves, nature reserves, landscape reserves, virgin and quasi-virgin forests, which conserve special genetic resources. Functional type T2 includes forests with special protection functions where timber harvesting is substantially reduced so that the restrictions imposed do not affect the forest ecosystem.[51]

High conservation value (HCV) forest: Continuously forested area (since 1955) where stands have similar structural complexity and are subject to anthropogenic pressure similar to primary and old-growth forests (i.e., low pressure).[52]

Old-growth forest: Forest stand or area consisting of native tree species that have developed, predominantly through natural processes, structures and dynamics normally associated with late-seral developmental phases in primary or undisturbed forests of the same type. Signs of former human activities may be visible, but they are gradually disappearing or too limited to significantly disturb natural processes.[53]

Primary forest: Naturally regenerated forest of native tree species, where there are no clearly visible indications of human activities and the ecological processes are not significantly disturbed.[54]

SUMAL: Romania's integrated wood traceability system, in which all operators transporting wood must fill in specific data (e.g. logging permit data including wood type and quantity etc), in order for their transports to be legal.

U.P.: "unitate de producție": forest production unit in forest management plans (FMP).

Types of logging according to Romanian law (Order No. 2535/2022 and the Forest Code 46/2008):[55]

Progressive logging (in Romania legislation, referred to as 'tratamentul regenerărilor (tăierilor) progresive' and in APVs, referred as 'T. progresive'): irregular, repeated, successive and uneven cuts in different time periods throughout the "exploitable areas" which leaves gaps in the forest stand to enable natural regeneration. Treatment can last up to 30 years or more.

Clearcutting (in Romania legislation, referred as 'tratamentele cu tăieri rase' and in APVs, referred as 'T. rase'): harvesting all trees in an "exploitable area" in a single cut, usually intended to remove/replace unsuitable forests.

"Cvasi" close to nature logging (in Romania legislation, referred to as 'tratamentul codrului cvasigrădinărit (tăierilor cvasigrădinărite sau

jardinatorii)'): repeated selective harvesting, applied over a longer tree regeneration period of 40 to 60 years.

Conservation logging (in Romanian legislation referred as 'lucrările speciale de conservare' and in APVs referred as 'T. conservare'): creating conditions to improve the profitability of the forest, in particular removing trees deemed to be of low-quality as to enable trees with superior characteristics. Limited to 10% of the total area and based on assessments of foresters.

Accidental logging (in Romanian legislation referred as 'Produse accidentale I & II' and in APVs referred as 'T. produse accidentale'): sanitary logging by removing trees that are impacted by biotitic and/or abiotic factors including dry/drying trees, trees broken by the wind or snow, as well as those that are sick, attacked by pests or impacted by pollution.

The logging regimes mentioned above do not consider aspects/needs of the ecological functions of the forest, including the biodiversity dependent on different types of forest succession.

Annexes

1. SUMMARY table: Suspected breaches of EU or national law and bad forest management practices in forests owned by Ingka Investments in Romania

Analysed forest area according to FMP	Alleged breaches of law and poor forest management practices
1. U.P. Popești, Iași	• appropriate assessment (AA) not performed before logging • number of allowed interventions was exceeded in parcel 144 (2 instead of 1) • maximum allowed wood volume to be extracted was exceeded in parcels 144 and 145A by a total of 200.50 m^3 • poor natural regeneration for oak species • biotope trees and dead wood missing • clearcut around water bodies (several ponds) • habitats and threatened species affected • breaches of SUMAL wood traceability system, e.g. several transport notices showed deficiencies such as wood loads not clearly visible and abnormal routes taken • soil degradation including erosion • damage to trees not subject to logging.
2. U.P. Nehoiu, Buzău (Penteleu forest)	• appropriate assessment (AA) not performed before logging • falsification of average age for several parcels in forest management plan (FMP) opening them up to logging • clearcuts disguised as close to nature forestry • degradation of potentially primary and old-growth forest • severe soil erosion due to use of heavy machinery during rainy weather • damages to trees which were not subject to logging • disqualification of forest areas from inclusion into National catalogue for virgin and quasi-virgin forests.

Analysed forest area according to FMP	Alleged breaches of law and poor forest management practices
3. U.P. Țibău, Maramureș	• number of allowed interventions exceeded in parcel 21D (2 instead of 1) • logging permits not renewed 8 months after expiry in parcel 13A • progressive logging disguised as “close to nature” forestry • traces of heavy machinery passing through the stream • soil degradation caused by heavy machinery passing through during rainy periods • access paths used for timber collection were not levelled, which caused water runoff and erosion in some areas • visible ecosystem degradation • no forest restoration conducted • protection level lowered considerably since Ingka takeover, from strict or partial protection to intensive wood production • no biodiversity trees and dead wood left after logging • poor or missing forestry markings.
4. U.P. Adâncata, Suceava	• clearcut allegedly illegally approved in mixed forest • number of interventions exceeded in one parcel • inappropriate works conducted in certain parcels; for instance, we found areas consistent with oak that should have been separated and logged with reduced intensity to allow natural regeneration • exceeding the inventoried volume per hectare compared to the FMP planning provisions • stand consistency is higher than 0.7, a value wrongly established by the forest planner • no site preparation was carried out before planting • no soil mobilisation works were carried out in existing plantations • low growth and other problems in planted saplings due to lack of works • previous logging recorded in 2013 (sanitary logging); Ingka takeover in 2014 and start of intensive logging.
5. U.P. Cicănești, Argeș	• incorrect application of progressive logging with visible degradation of forest ecosystems • due to classification as protection forests, these forests should have been put in category of moderate or no interventions • number of interventions foreseen by FMP has been exceeded in one parcel • soil degradation caused by the use of heavy machinery in periods of heavy rainfall; severe soil erosion up to 3-4m deep • traces of machinery passing through the stream • last autumn no ARN works were observed in the field • biodiversity trees and dead wood were not preserved • poor, unmaintained or missing forestry markings • periodic pollution of the creek due to silt carried by torrents on eroded roads.

Analysed forest area according to FMP	Alleged breaches of law and poor forest management practices
6. U.P. Ceahlău/ Dreptu, Neamț	• close to nature and progressive logging resulted in forest degradation • forest stands of 170 years average age opened up to logging • local stream degraded by logging operations • severe soil degradation and erosion (3-4 metres deep forest road) caused by the use of heavy machinery in periods of rainfall; soil not levelled at the end of logging works • soil degradation exacerbated by excessive tractor roads inside forest area • damage to trees not subject to logging.
7. U.P. Câmpuri-Panciu, Vrancea	• conditions of exploitation specific to the protected natural area Soveja Natura 2000 site not respected • parcel 8F was downgraded by choosing the lower average age for the whole parcel • no biodiversity trees and dead wood were preserved • severe soil degradation caused by the use of heavy machinery in periods of rainfall; roads not levelled at the end of logging works • soil degradation exacerbated by excessive tractor roads inside forest area • soil degradation slowing down species regeneration • damage to trees not subject to logging.

2. Letter of concern from Agent Green and Bruno Manser Fonds to Ingka Group and IKEA Switzerland, Basel / Bucharest, 15 May 2023

3. Complaints to competent Forest Guards regarding suspected breaches of the law and bad forestry practice detected in Ingka forests

Endnotes

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- INFR(2020)2238 (Habitats Directive). Formal notice July 2020. Romania has not designated its EU Sites of Community Importance (SCIs) as Special Areas of Conservation (SACs) and, it has generally and persistently failed to set site-specific detailed conservation objectives and measures, thus failing to maintain or restore the protected species and habitats to a favourable conservation status;

- INFR(2020)2297 (Habitats Directive). Formal notice October 2020. Among other issues, the Romanian legislation does not explicitly mention that conservation measures contained in management plans need to take into account the ecological requirements of the natural habitat types and species present on the Natura 2000 sites. This has a direct impact on the quality of the management plans as they may not contain the necessary measures to protect these habitat types and the corresponding species. The national law therefore limits the scope of a key provision of the Directive to activities within Natura 2000 sites.

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