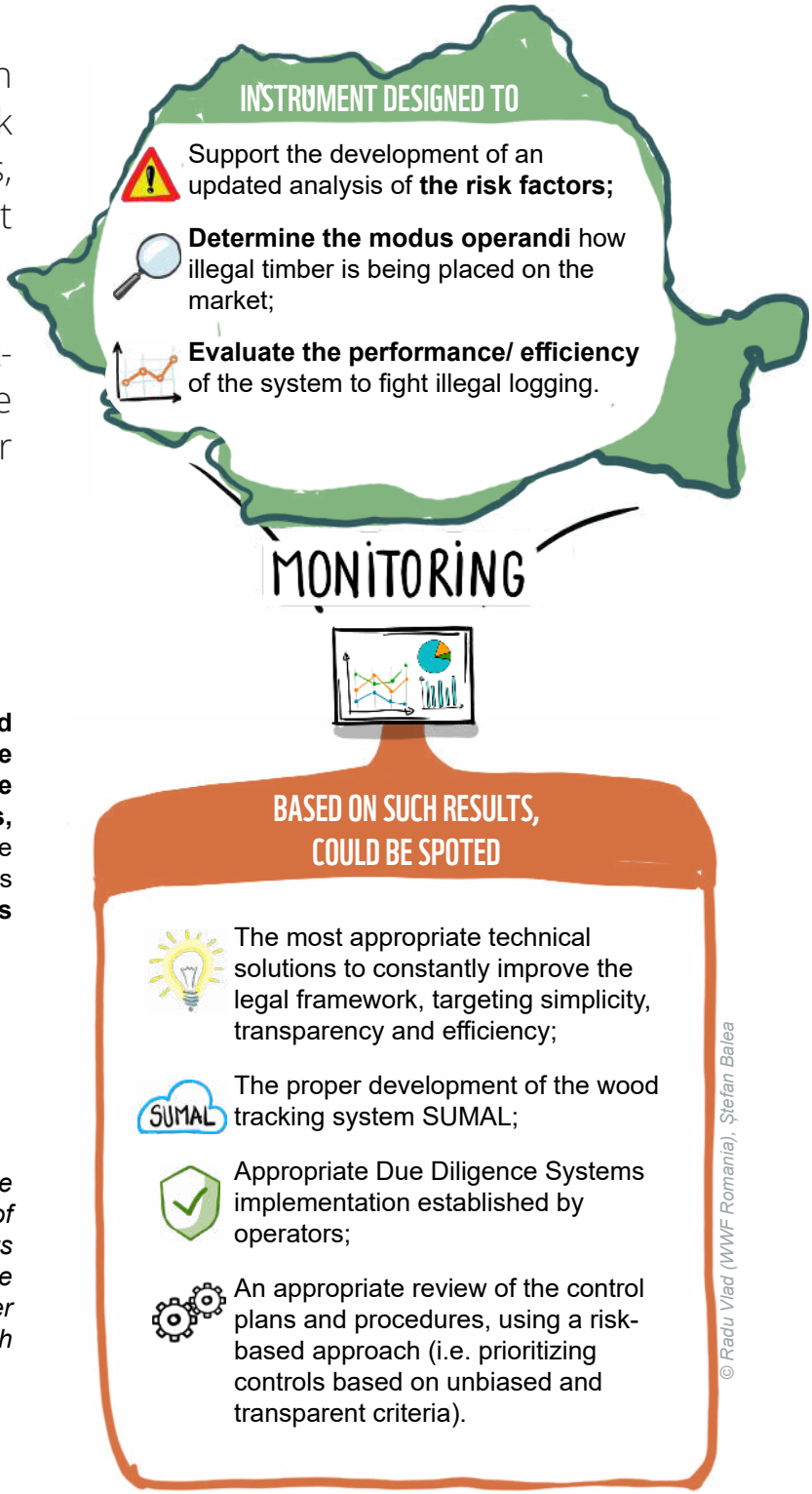
Monitoring the enforcement of timber tracking rules

A tool to determine the evolution of modus operandi and the risk factors related to illegal logging

Monitoring Report May 2022

Being aware of these elements, we can permanently adapt the legal framework and adequately prioritize controls, based on unbiased and transparent criteria.

Planning controls outside of a risk-based approach, jeopardize the achievement of an effective system for combating illegal logging.



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Purpose

Increasing the institutional capacity to prevent and combat illegal timber harvesting and related trade by developing a **tool to monitor and evaluate the level of law enforcement on wood tracking rules,** focused on timber's first placing on the market (N.B. we therefore propose the first dedicated instrument that is technically grounded, on using **statistical estimations** of the realities detected in the field).

Disclaimer

The monitoring results included in this report have no statistical relevance on reflecting the image of illegal logging at regional/national level. The results of this report are therefore presented to illustrate the potential of this instrument, which we wish to further develop through a participatory process, together with authorities and the other relevant stakeholders.

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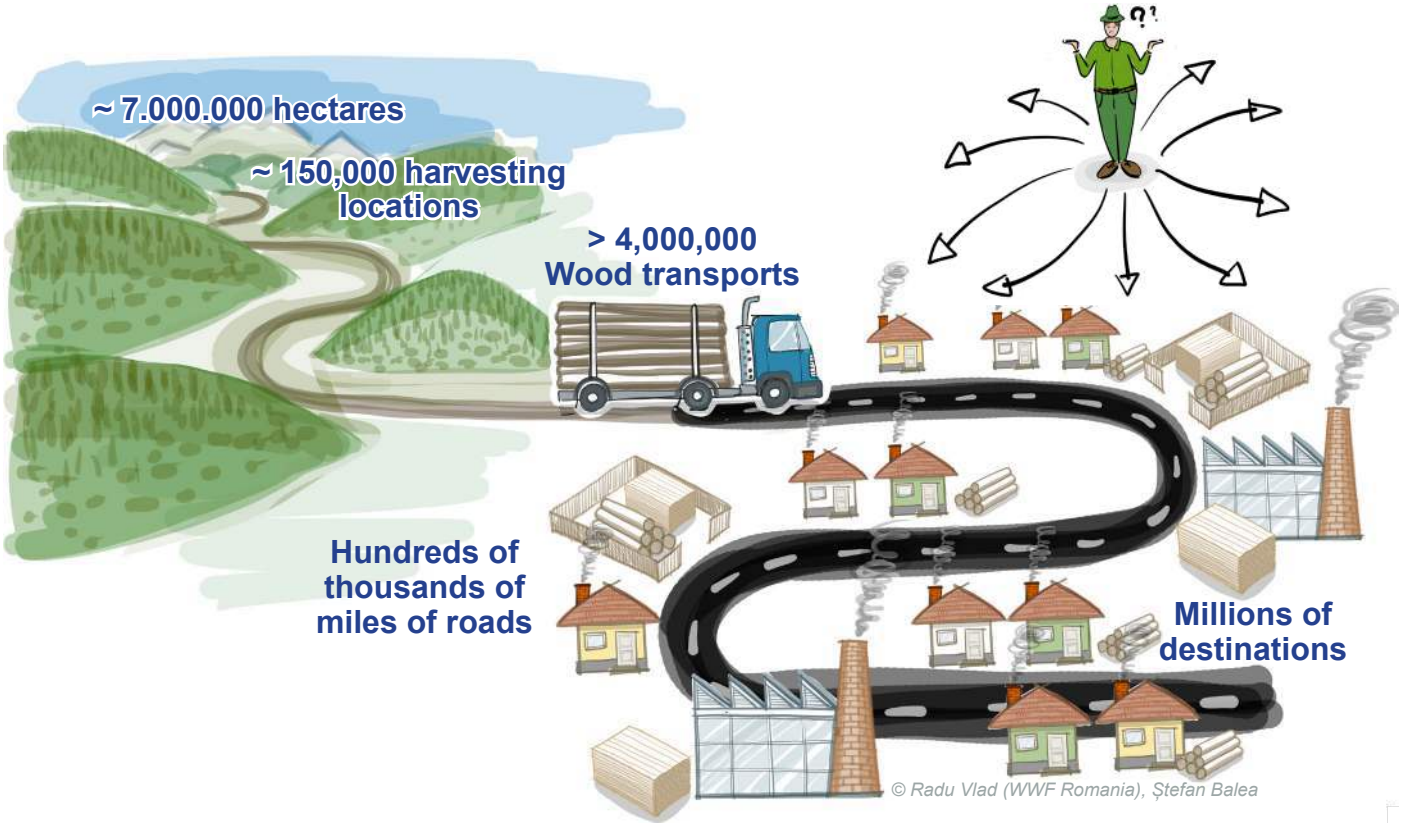
Context:

Since **control resources are limited** and the number of timber transports at a national level exceeds 4 million (those can be achieved in 365 days/year, starting from over 150 thousand locations, spread over 7 million hectares and running along hundreds of thousands of kilometers of roads to hundreds of thousands/million destinations), it is obvious that **prioritizing controls following a risk-related approach is absolutely necessary.**

At national level, the Forestry Guards have only 935 job positions for forestry trained people. The staff schemes are not completed and only a part of this staff has control competence regarding the wood tracking / checks to verify the DDS implementation on operators. Furthermore, given the multitude of legally binding bureaucratic administrative tasks that the Forestry Guards have, the competent authorities' commissars get to see the forest less and less.



Control plans must be based on a set of **impartial and transparent criteria** indicating **WHERE? WHEN?** and **HOW?** these controls should be carried out in such a way that the most relevant risk areas are addressed.

The performance of the competent authorities on exercising controls should be assessed based on the results obtained on fulfilling their own control plans.

Transparent criteria are needed to incentivize prevention, but also to avoid abuses or controls carried out on a discretionary basis (considering also here the threat of political involvement).

National and Community legislation requires setting up periodically reviewed control plans "following a risk-based approach", i.e., proactively planned thematic controls that consider the specific risks as perceived by the competent authority. However, there is also a legal obligation (including clear deadlines) for competent authorities to prioritize the analysis of the complaints received from third parties. Thus, due to the large number of complaints (often unfounded - leading to a jamming effect), the control resources finish before the controlling plan designed by the authorities can even be carried out.

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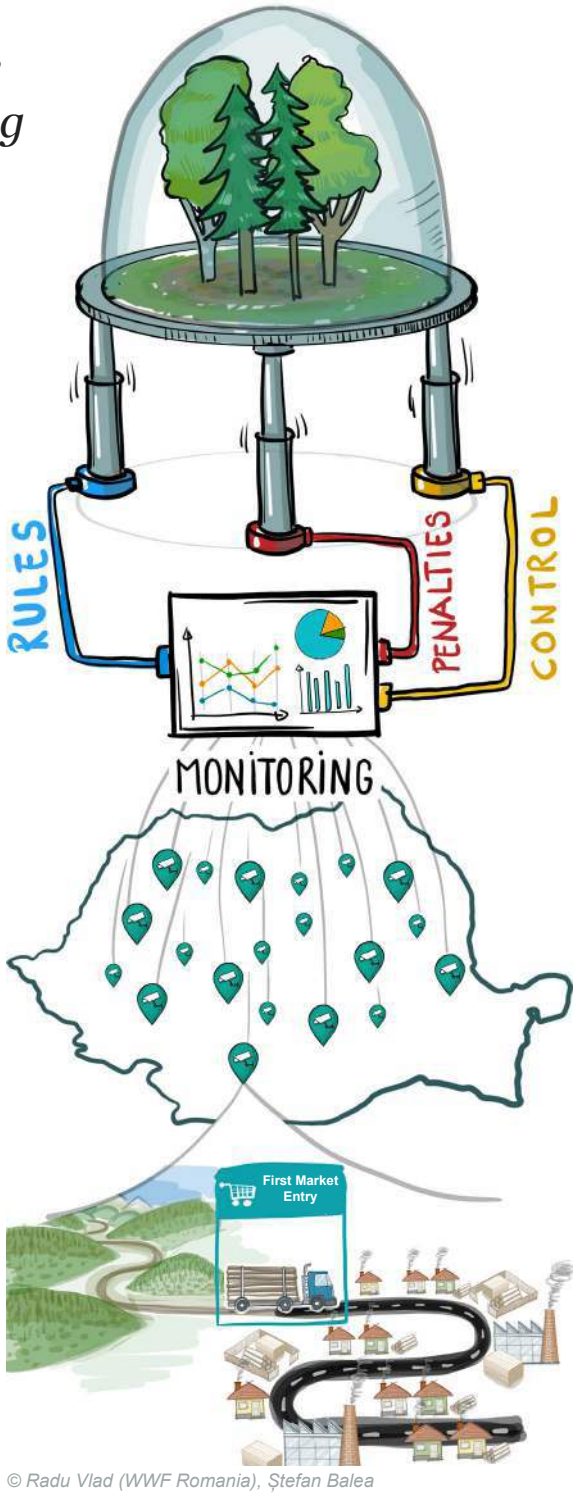
Monitoring the enforcement of timber tracking rules

Rules, Sanctions, Controls: *the three pillars on which the system for combating illegal logging is based, continuously optimized through* ***monitoring*****.**

An efficient system for combating illegal logging is based on a **set of rules** (involving a traceability system) that **can be easily monitored** and mostly, generate **convincing evidence** following controls exercised.

To discourage breaking the rules established by the traceability system, it is necessary to adopt a penalty system proportional to the damages level (to be proportionate) and that can work as a preventive mechanism (to be dissuasive).

All these do not help if the field controls do not target critical areas of the timber chain of custody, where the biggest risks of placing illegally harvested timber on the market occurs.



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WHERE? WHEN? *and* ***HOW?*** *should these controls be carried out in order to address the most relevant risk areas?*

In order to be able to answer these questions, we need to continuously monitor the realities in the field, to capture the evolution ***of modus operandi*** and ***the risk factors*** that need to be taken into account when planning controls. These are key elements that can be determined by this monitoring methodology.

Furthermore, by developing an appropriate monitoring protocol, this tool could also determine the **level of illegal logging** at regional/national level and act as a barometer for the efficiency of the constantly changing legal framework.

Modus Operandi

The usual way operators can act to avoid the legal requirements regarding wood tracking rules; transports missing timber waybills (i.e. no SUMAL code registered); multiple transports carried out with the same waybill /SUMAL code; dishonest records of the quantities of timber transported leading to flagrant overloads; the prevalence of the categories of means of transport used; the time of day /week when non-compliant transports usually take place.

Risk factors

Administrative, socio-economic and environmental circumstances that are influencing the prevalence of illegal harvesting at local level (e.g., the share of unmanaged forests, the complexity of the forms of management at basin level, the need for firewood for population, the auction price of standing timber compared to market prices, the share of forests outside the national forestry fund, etc.).

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Fundamental problems of the system for combating illegal logging in Romania

1. The use of the stumpage sale system, where tree marking and quantitative/quality estimation of timber products before being harvested remain the main benchmarks of the control system, but which do not produce conclusive evidence in court. Thus, a "grey" zone is legalized, which has proven to be impossible to control (N.B. these practices could not be identifiable/ dismantled even by modern control methods using DNA analysis or isotopes).
2. The integrated electronic timber tracking system (SUMAL) has not yet solved the loopholes that allow the "manufacturing" of legal provenance and has not operationalized the automated alerting system and the preventive transparency elements it was meant for.
3. Sufficient checks are not systematically and persistently carried out by the authorities in critical areas of the supply chain. Effective controls of the first timber placing on the market (i.e., concentrating efforts to verify shipments that leave from the place of harvesting) is practically refused /hampered, so efforts to prevent illegal harvesting are dissipated throughout the entire chain of custody of wood, with little efficiency considering that (also in the wood processing sector) conclusive evidence cannot be obtained (see below for more explanations).
4. There are no tools to quickly check on the quantities of timber transported. In their vast majority, the controls are limited to verifying the existence of the wood products accompanying waybills (i.e. if transport is registered in SUMAL) and less checking the volumes and the assortments declared.
5. Lack of representativeness of controls; controls are often not conducted based on impartial and transparent criteria that follow a risk-based approach. The few controls on the vehicles leaving from the harvesting place are often carried out randomly or even discretionary.
6. The penalties are not effective, proportionate and dissuasive. A rather aberrant threshold of 10 m³ is established to sanction, as a forestry crime, the transport of wood materials not accompanied by specific transport documents that will clearly show the legality of their origin; below this threshold, fines are not dissuasive but more symbolic.
7. The system itself contains a series of unnecessary administrative burdens, generating a significant costs increase (N.B. all costs generated by this set of norms are finally paid by the forest through its wood).

A solution to eliminate systemic conflicts of interest:

- the quantitative and qualitative estimation of the "stumpage wood" (standing timber) should remain a supporting document, as an estimate serving the logging activity and the sales procedures; it should not be accepted as basis for invoicing;
- when capitalizing on the stumpage timber, the payments should be strictly related to the quantities of timber harvested and shipped out from forest, according to specific transport documents registered in SUMAL.

The "mark" applied on trees after a short period of time. This is how the legality of the harvesting is "proven".

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Mothodology

In this second monitoring round (carried out in November-December 2021) we returned after one year in **exactly the same locations and calendar days** (the weather conditions were similar, by coincidence) as in the first round of monitoring (November-December 2020). The same procedures were used for data collection and interpretation.

The target was to understand the relevance of the methodology, as well as the parameters to consider when **developing the monitoring protocol,** but also to try to assess the impact of **legal changes**[1] on the evolution of the modus operandi.

The testing presented in this report were carried out in order to develop this methodology for monitoring the enforcement of timber tracking rules for transports leaving the site of harvesting. The data obtained are used to develop a monitoring protocol allowing such assessments at regional/ national level.

The selection of monitoring points has NOT yet been based on a monitoring protocol (that protocol is in progress and should result from a series of repeated checks), being mainly conditioned by the logistic requirements for testing/calibrating the procedures and techniques used. Also, the number of transports observed is not a representative sample at national level.

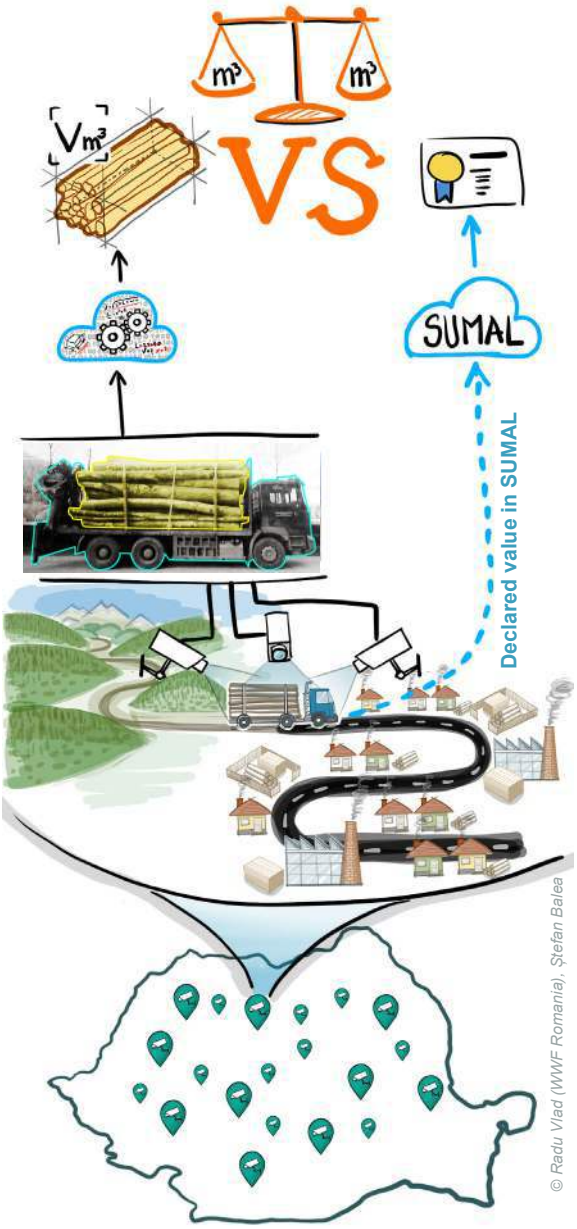
Therefore, the results of the current monitoring are not statistically relevant to reflect the image of illegal harvests at national level, but only capture certain specific situations encountered during the monitoring period at the respective monitoring points.

The methodology (still in progress) proposes monitoring the timber transports through a **system of video cameras** located on forest roads, in certain **confidentially selected locations** (N.B. judiciously sampled based on a **monitoring** protocol), following the segment of the **first wood placing on the market** (also to avoid “double” reporting).

The collection of field data was carried out unexpectedly, using a system of surveillance cameras located at a fixed location. The circulation of wood materials in these locations was monitored **7 days/week, 24h/ day.**

When choosing the monitoring points, the access network route to the harvesting areas was taken into account, avoiding as much as possible any potential unloading point (e.g. warehouse, processing point, households) between the harvesting site and the location of the monitoring system.

The wood transports were checked exclusively with the help of publicly available data, through the mobile app Forest Inspector— SUMAL 2.0, and the desktop version, respectively. In order to be able to evaluate the offline transports, closed basins were chosen and the verification of the records in the Forest Inspector followed the legal terms specified in the SUMAL.



The methodology is practically based on the **comparative analysis between the information collected from the field** (based on the images captured by these cameras) **and the data officially recorded in SUMAL**. It relies on identifying the transports without documents certifying the legal origin, “multiple transports” using the same documents of origin, but also overloaded transports — in case of flagrant differences between the actual transported volume and the one registered/ declared in SUMAL.

The results of this report are presented only to illustrate the potential and usefulness of this instrument.

[1] Legislative changes aimed at the system of combating illegal exploitation in Romania, referring here mainly to the establishment of SUMAL 2.0 (GD 497/2020) and the amendment of the sanctions regime (through amendments to the Forestry Code and the Forest Offenders Law).

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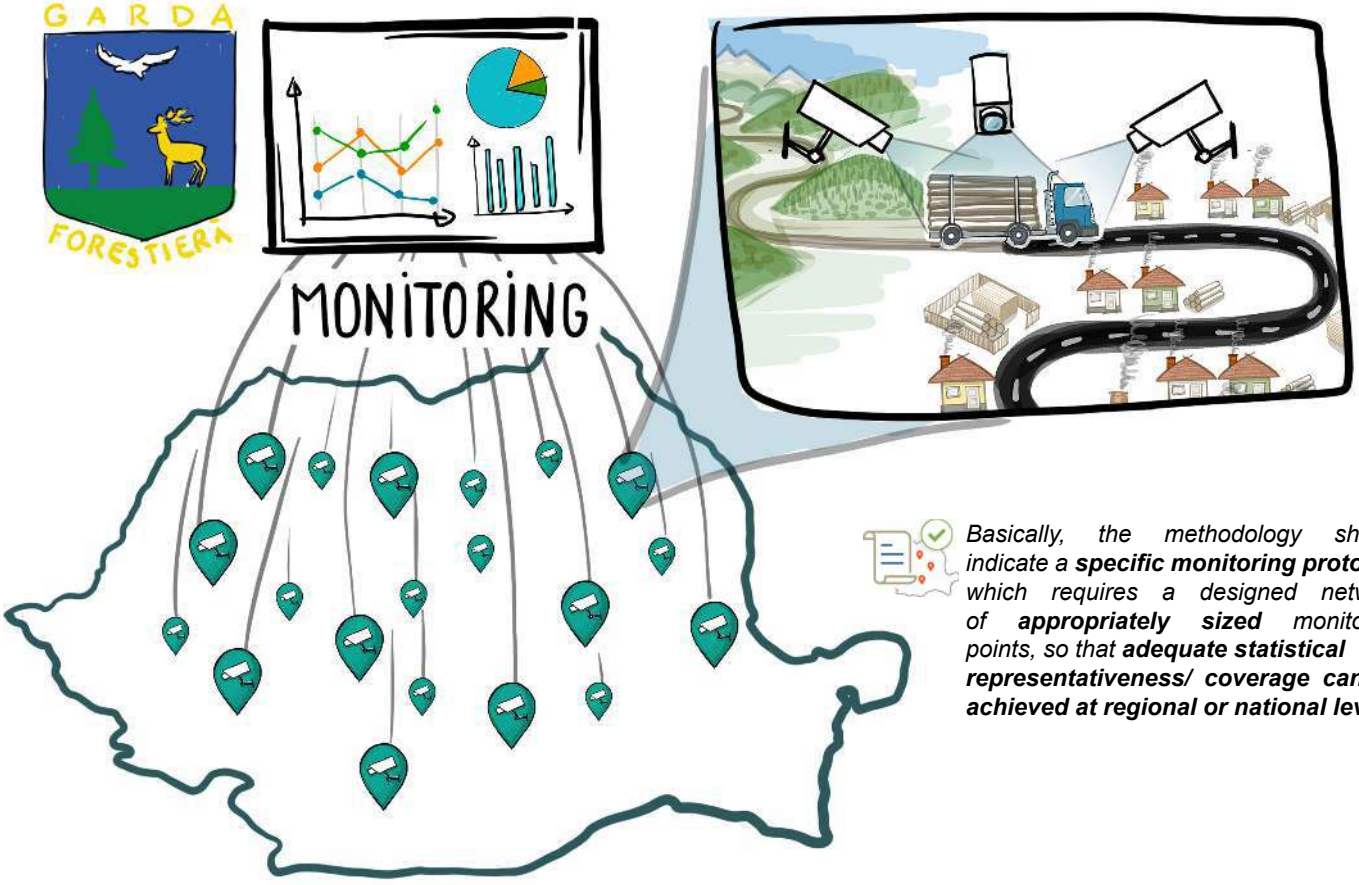
To estimate the quantities, species and assortments, specialists carried out four independent evaluations (three distinct methodologies were implemented), based on images collected by video cameras corroborated, when necessary, with images uploaded in the Forest Inspector (when photos were correctly taken).

To record a non-compliance, all four independent specialists had to confirm the overload and, moreover, the smallest additional difference had to exceed **20%** of the declared volume. **The interpretation of the evaluations followed a cautious approach — therefore the values presented being, in our understanding, minimal.**

Implementation

We propose setting up a **specialized team** within the National Forestry Guard to take the initiative of further **developing this methodology** and to ensure its **proper implementation** through a **participatory and transparent process that** involves the relevant stakeholders (e.g., academics, research institutions, forest managers, operators and civil society).



*Basically, the methodology should indicate a **specific monitoring protocol**, which requires a designed network of **appropriately sized** monitoring points, so that **adequate statistical representativeness/ coverage can be achieved at regional or national level.***

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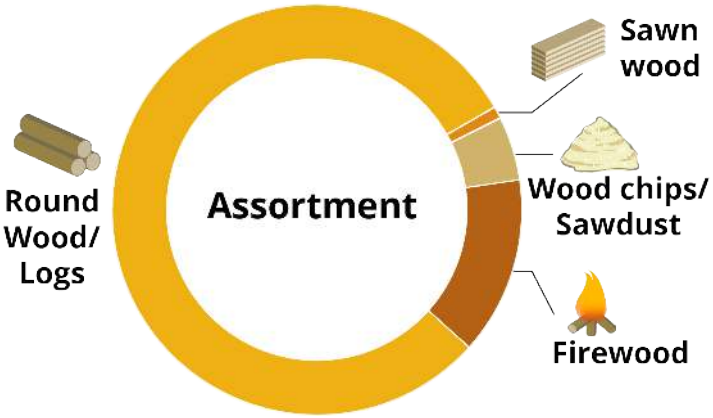
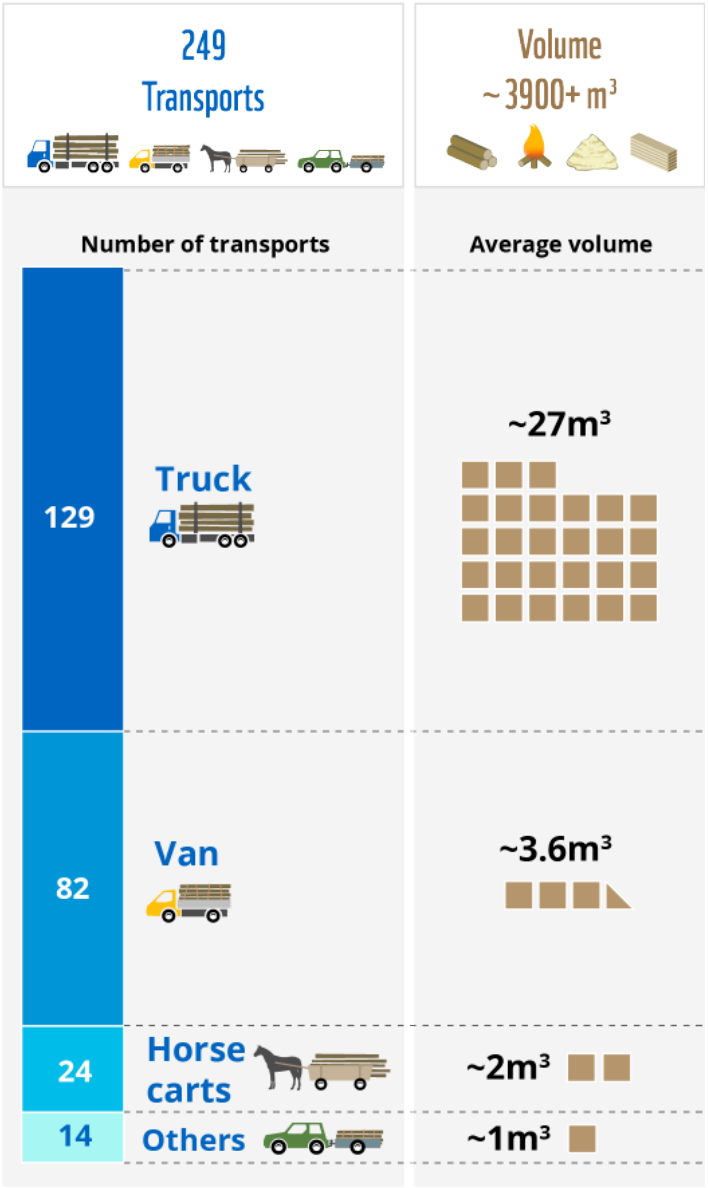
Results

General results

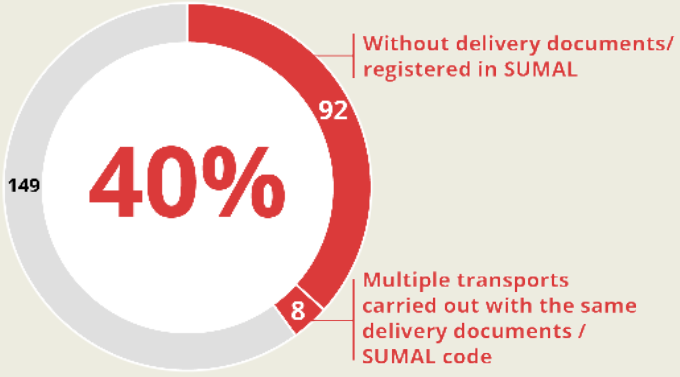
The monitoring activity took place between November and December 2021, returning to the same 3 different locations where the first monitoring was carried out (2020), totaling 21 days of overall surveillance, each location with 7 days of uninterrupted video surveillance of the access roads.





There is a high percentage of transports without transport documents registered in SUMAL to prove the legal origin; this is mainly due to the large number of firewood transports without documents (it is the case of: all transports with trailers and horse carriages and about 45% of the vans);

About 1 of 5 trucks observed through the monitoring program didn't have transport documents registered in SUMAL to prove the legal origin of the wood materials.



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Monitoring the enforcement of timber tracking rules

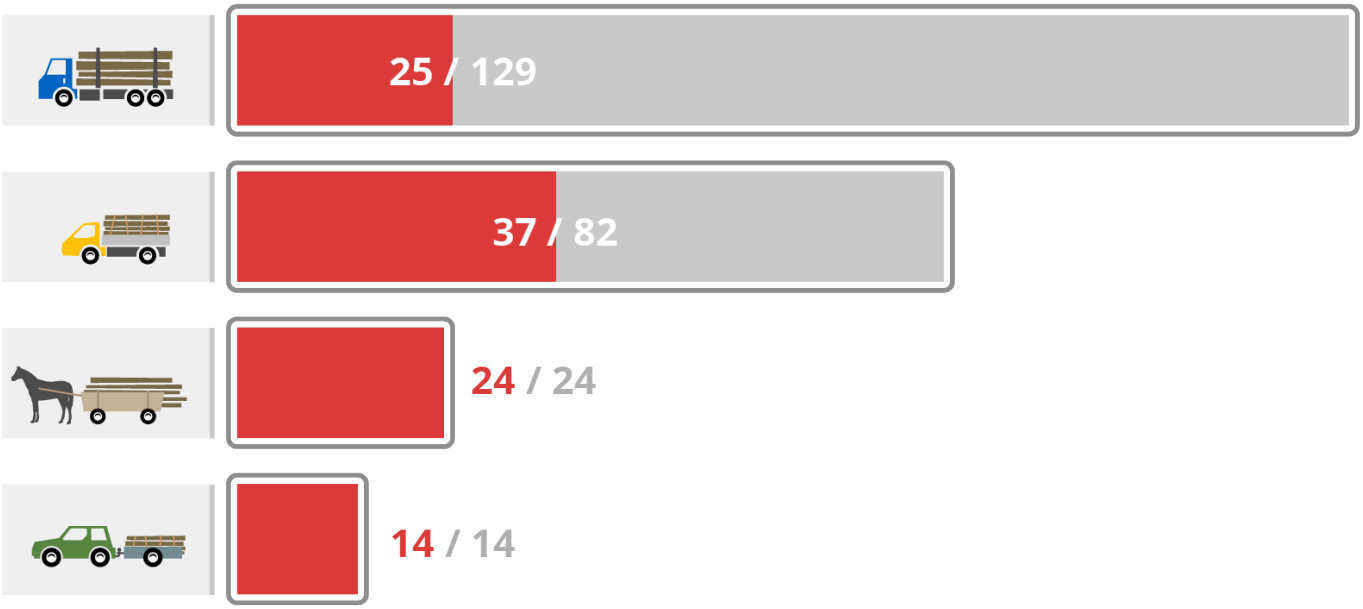
50 Professional Transporters

35 Transporters that do not have the quality of professional carriers

A large number of transports made by non-professional transporters is observed, but their volume ratio is low.

SUMAL 2.0 didn't manage to automatically limit professional transporters to act also as non-professional carriers (we could observe transports registered in SUMAL with the same vehicle ID that were alternatively operating as professionals and non- professionals).

SHARE OF TRANSPORTS WITHOUT DOCUMENTS REGISTERED IN SUMAL, GROUPED BY MEANS OF TRANSPORT



Recommendations:

- Closing SUMAL 2.0 gaps by changing the way the application works;
- Developing a new SUMAL Owner module, to simplify and optimize the legal capitalization of the timber belonging to small forest owners, including forest vegetation outside the national forestry fund (orchards, meadows, pastures, etc.), for their own use (firewood, rural constructions, wineries, etc.); it should work only for small owners who are not operators and their wood does not enter the wood market /economic flow.

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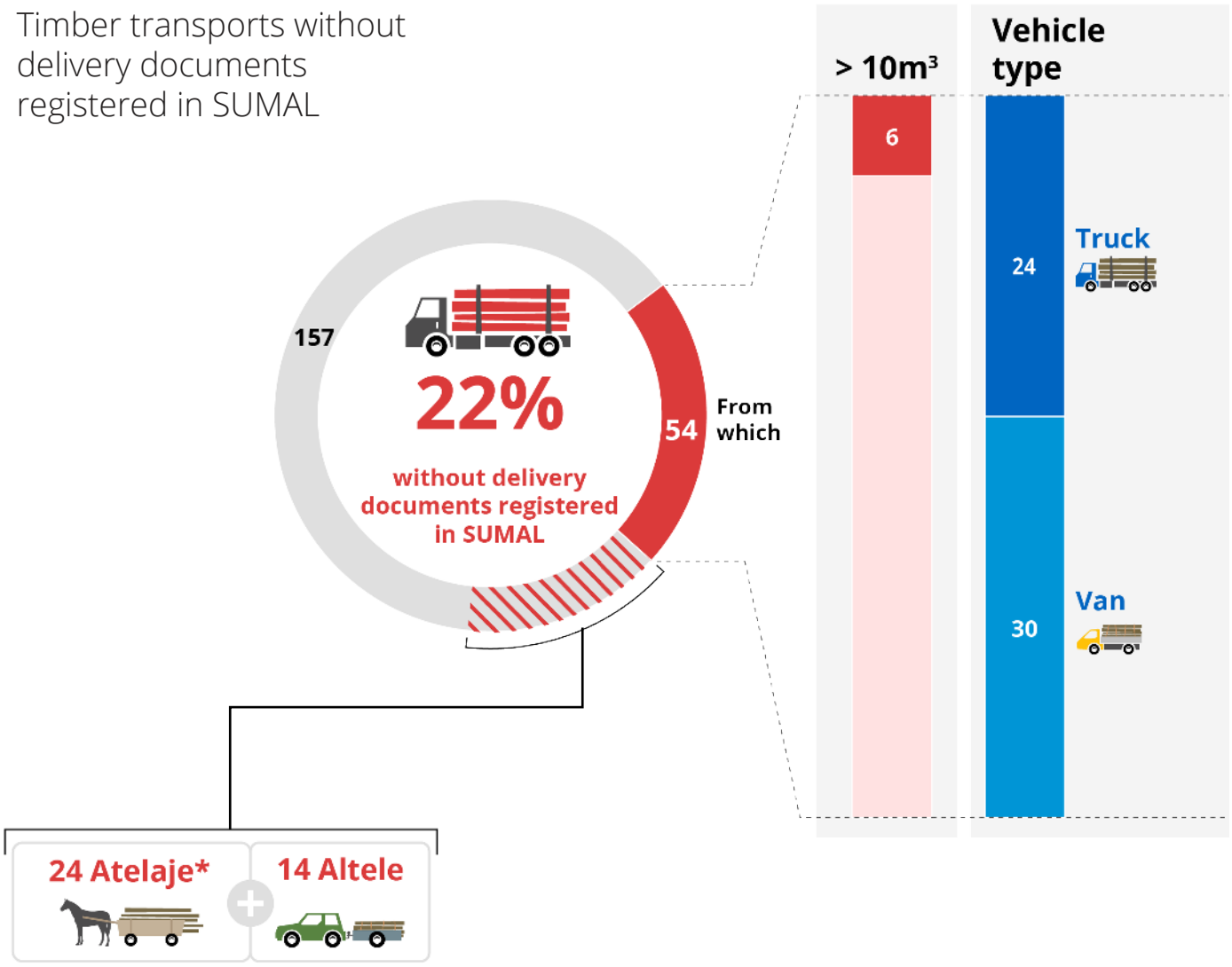
Transports without delivery documents

Timber transports without delivery documents registered in SUMAL



- Most wood transports without documents registered in SUMAL are carriages, car trailers and vans carrying firewood, most likely intended to cover the basic needs of local communities.
- **All transports** carried out by non-professionals using carriages or trailers and spotted in the monitoring program, were not registered in SUMAL2.0 (although this is a legal obligation to prove the legal origin).
- In order to allow a comparative overview (monitoring results 2020 vs. 2021) and since the Forest Inspector's Platform Version 1.0.7 (previous one) did not provide the necessary data to verify the legality of transports (N.B. for carts was not mandatory to use Wood Tracking), the categories "Carts" (carriages) and "Other" were not included in the statistics.

This demonstrates that the results presented are not statistically relevant at national level (N.B. these transports legally registered in SUMAL, have a significant ratio in the Forest Inspector platform).

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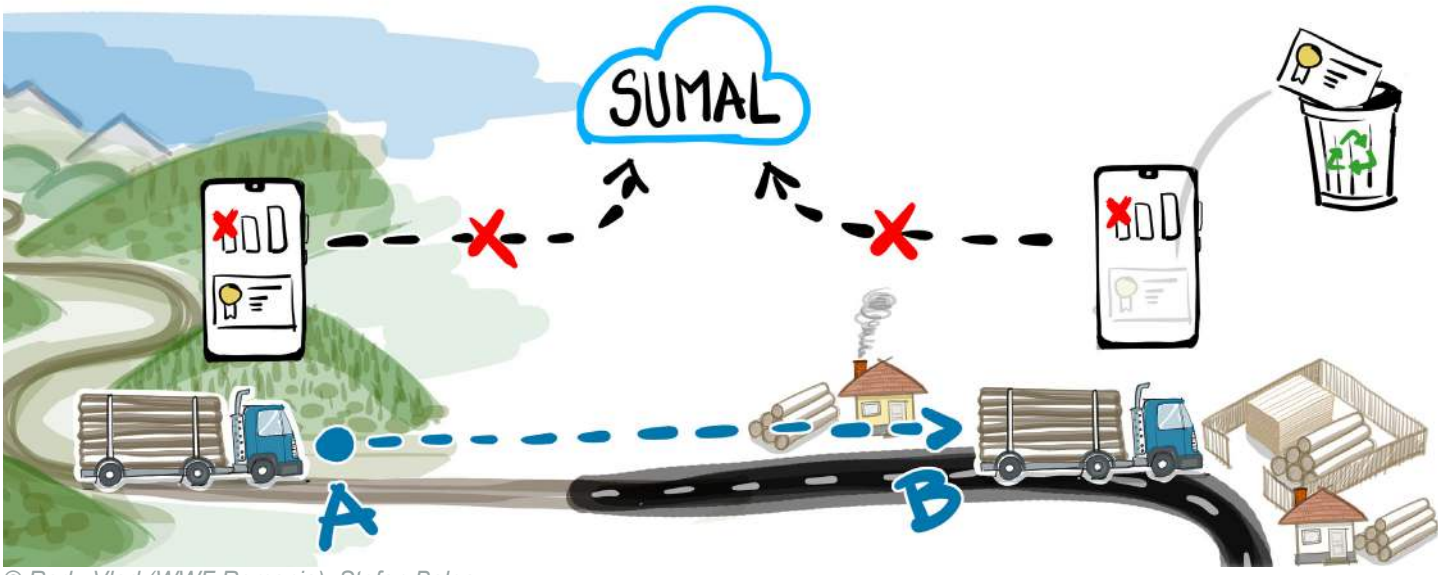
Interpretation

This situation can also be explained by the existing gaps in SUMAL, which WWF brought up immediately after SUMAL 2.0 was launched, namely f**orging the legality of timber origin and deleting the history of illegal transports.**

Thus, when timber is shipped from an area with no GSM signal or no traffic data, it is possible to generate transport documents and offline codes to legalize the timber transports leaving the harvesting site (N.B. assuming that all these offline recordings will be automatically recorded in SUMAL when the mobile reaches the area with access to traffic data /GSM signal).



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But if keeping the mobile on airplane mode and after delivery, the application is uninstalled or the cache memory is deleted from the phone's app, all offline recordings will be permanently deleted and will never appear in the system again. This way, the transport documents generated offline, by the app installed on the operator's phone, are not included in SUMAL.

The mechanism works as a "proforma invoice" that legalizes transports but is not included in the accounting system.

As long as these gaps remain, such transports will never appear in the system and will never generate any alert or suspicion; even if checked downstream later on cannot produce conclusive evidence (e.g. if a classic on-the-spot control occur in such situation, the airplane mode is switch and the transport became perfectly legal).

It is obvious that, for getting rid of transports without documents, the **electronic tracking system** for timber traceability alone (regardless of SUMAL improvements) **can have no impact**. These illegal transports can **only be prevented by focusing on** unannounced controls at the first placement on the market, doubled by **proportionate and dissuasive penalties.**

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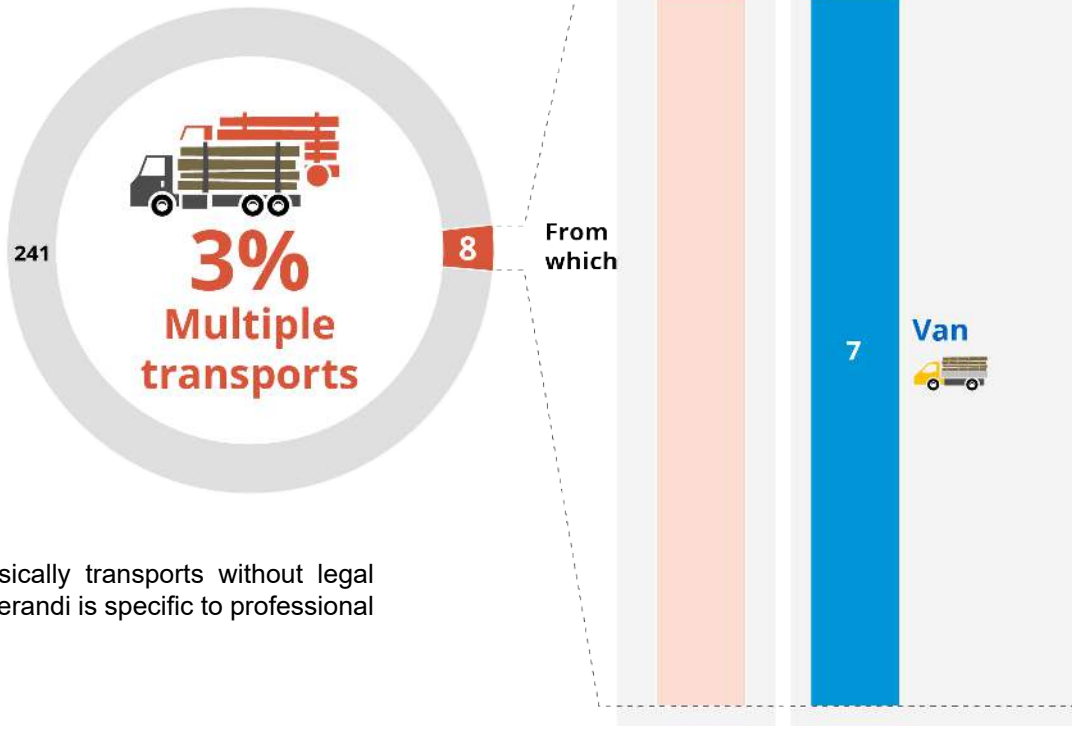
Multiple transports

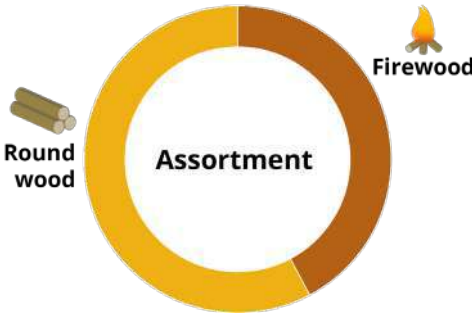
Multiple transports based on the same delivery documents registered in SUMAL



Multiple transports are basically transports without legal papers and such modus operandi is specific to professional transporters.

Interpretation

- The decrease in absolute values and the share of multiple transports (compared to the monitoring carried out in 2020/SUMAL 1.0, when multiple transports represented 7%) can be explained by the obligation to register the route in GPS, combined with the opening of new gaps in SUMAL 2.0 (see above – offline registration/cash removal is preferred to multiple transports);
- The more complicated the traceability system is and the more it includes unnecessary, costly administrative tasks, the more the tendency to avoid the system. That is why simplicity and transparency are basic preconditions for setting up an efficient traceability system (see in this context the proposal to develop SUMAL Owner module).
- Most professional transports (about 53%), according to the Forest Inspector Platform records, did not have **adequate photos of the entire load**[2]. Thus, in case of on-the-spot controls using Forest Inspector Platform/App, multiple transports (especially those on short distances) cannot be immediately expose.



- As **transparency** is a key factor for the efficiency of timber tracking systems, accurate /**compliant photos** included in SUMAL should be a basic **requirement, systematically checked by the DDS systems** implemented by operators.
- Without continuous monitoring, these non-compliances cannot be detected during regular controls.
- The fight against multiple transports can be tackled simply and efficiently by establishing the "digital transport fingerprint" – the electronic seal of transported wood materials.

[2] In the case of primary waybills (see the red dots — place of harvest — on the forest inspector's platform) there was still an absolutely significant share of consignments not accompanied by adequate photos of the entire load of wood materials as required by Government Decision 497/2020. It should be noted that until 7 February, the total number of forestry offences found for this type of non-compliance (based on Article 19 of Law No 171/2010), was only 201 contraventions of which 185 were offences with fines applied.

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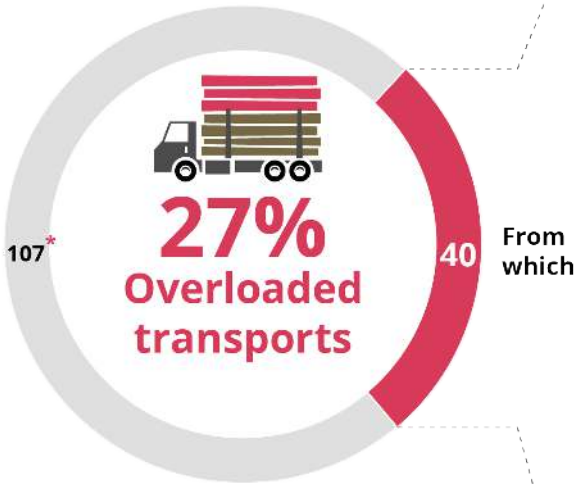
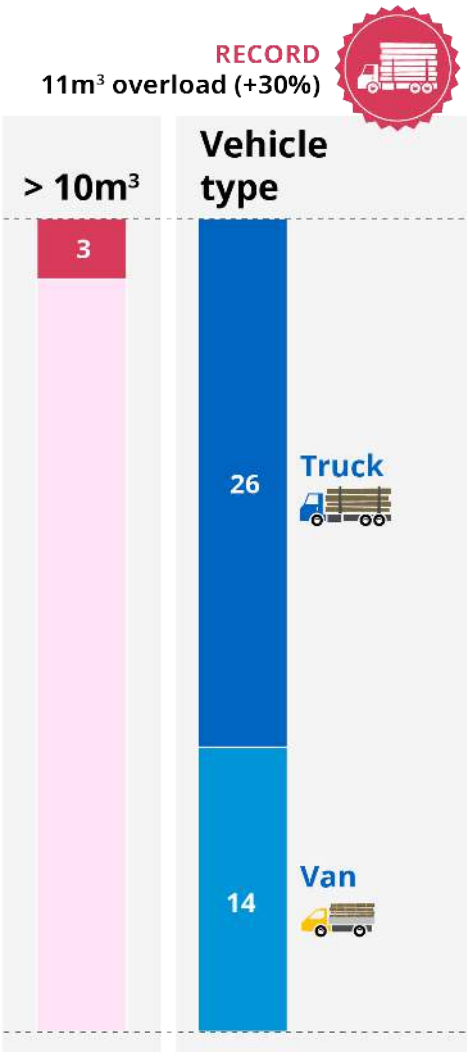
Transport overload

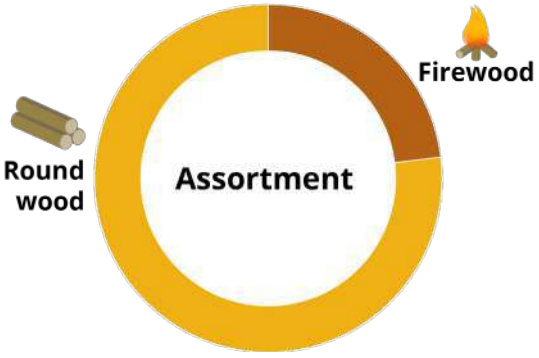
Fraudulent statement regarding the quantities of wood transported registered in SUMAL – Flagrant overloads





* *For such assessment, due to technical reasons, not all transports captured on the cameras, could be rigorously analyzed (i.e., the quality of the recorded images did not allow proper volume assessment).*

- An overload threshold of at least 1m³ and exceeding **20%** of the declared volume (**cumulative thresholds**) have been taken into account for result interpretation; thus, we consider that only those consignments that showed a flagrant overload were identified based on the applied methodology.
- Differences of less than 20% were not considered in these statistics even if they were clearly identified in **the SUMAL records made by operators themselves[3].**
- There were also situations when, after the photos were recorded in SUMAL, a few more logs were loaded (it is possible that they were unloaded before the transport reached the warehouse/destination). Thus, the **"digital footprint of transports"** could be a useful tool, even in the operators' interest, to prevent "leaks along the route".



[3] In case of the same transport/load (clearly identified by the photos registered in SUMAL), significant differences (eg: 3-5mc/transports) between the recorded volumes in the initial transport paper (eg: transports from the harvesting area to the warehouse) and the secondary paper (eg: transports from the warehouse to other processing units) were identified. This practice is frequently used by some operators, but could be easily prevented by implementing the "digital footprint of transports".

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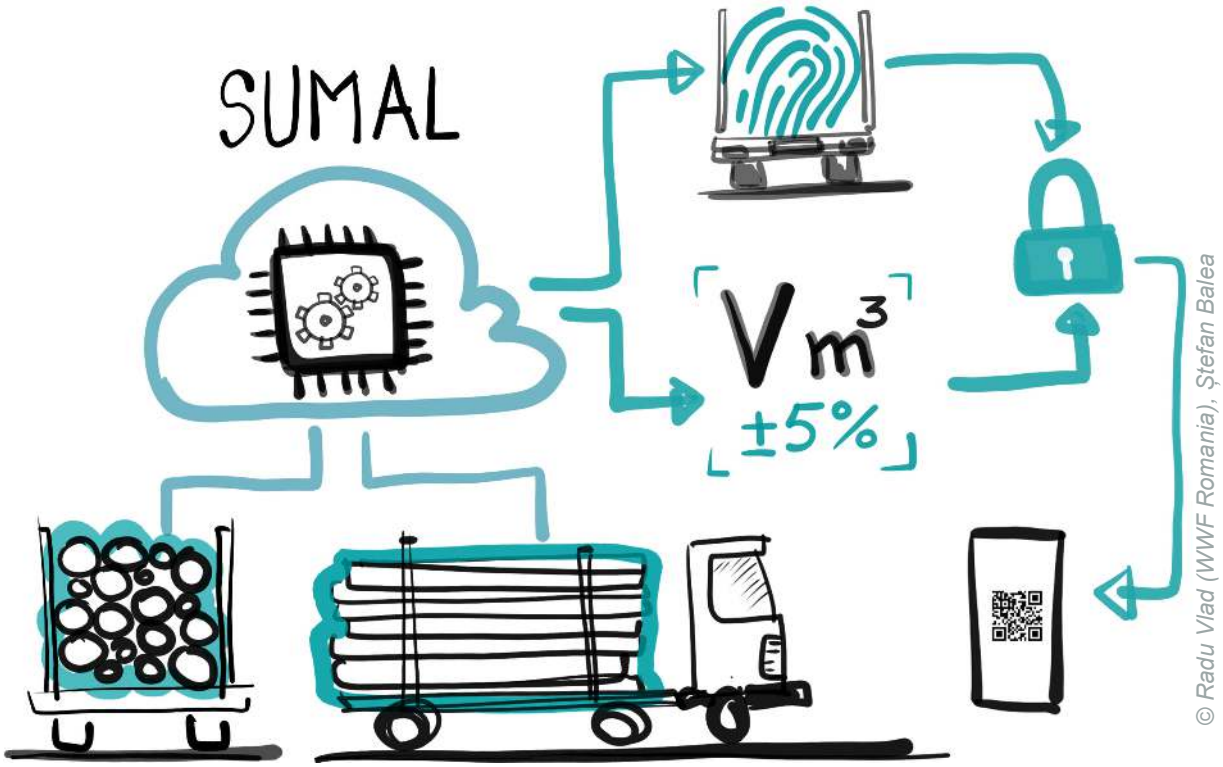
Interpretation

- Overloading is confirmed again as the most common modus operandi, mainly favored by the following factors:
  - » SUMAL 2.0 is not designed to make a preliminary, automated verification of the data entered regarding the quantities of timber declared;
  - » the number of controls is insufficient especially on first timber placing on the market and the control procedures and instruments do not allow **a swift measurement of the volumes**[6];
  - » the penalty level does not discourage these practices.

- In order to develop thematic controls, modern technical methods should be developed to allow the swift volume check by scanning the transport and determining the volume by technical cubing with an accepted deviation. This swift volume check together with the **graphic fingerprint, should represent the "electronic passport" for market placement. Classic quantity control procedures should be mandatory only if these indicate that accepted deviation was exceeded.**

- We also observe a significant decrease of transports exceeding 10 m³/transport overloads (i.e., in 2021 maximum 3 transports with threshold-level overloads vs. 16 transports in 2020 when overloads of more than 18 m³ were identified); this cut can also be attributed to:
  - » tougher penalties for such practices (N.B. > 10 m³ is sanctioned as a forestry criminal offence),
  - » the requirement to display images of transports in a transparent way on Forest Inspector platform.

Modern technical solutions that allow **swift volume check** *need to be developed*



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[6] Legal procedures to measure and verify the quantities of timber transported require the same methods and instruments used in the Middle Ages: caliper and roulette. Thus, the control of the legality of timber shipments in relation to volumes must follow a legal, slow and costly procedure that cancels the efficiency of the entire system (i.e. an equivalent of about 32 working hours is estimated to check on a single timber truck, plus the transport costs for several stakeholders involved, meaning the costs of operating the transport equipment and of handling wood materials).

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MODUS OPERANDI

Recording fictitious transports in SUMAL

Transports recorded in SUMAL 2.0 were identified, but which they were not captured by the monitoring cameras (e.g. 2 primary accompanying notices/waybills – one for the truck and the second for the trailer, but only the truck appears on the camera). It is a solution for adjusting the inventories in the warehouse/processing units.

SUMAL 2.0 claimed its **efficiency** by performing a permanent online check between the "inputs" and "outputs" of each wood processing warehouse/ wood processing unit (i.e. the volume of wood materials coming out of a warehouse cannot exceed the volume of pre-declared "inputs"). In this context, these kinds of practices effectively undermine the effectiveness of controls for traders

We drew attention to another gap in SUMAL that allows "forging the legal origin" by possible fictitious timber transport within the intra-Community area. (N.B. for intra-Community transports accompanying documents are not issued and there is no obligation to transmit standardized information in SUMAL 2.0. upon entry into the country, the transports are accompanied only by intra-Community documents (e.g., a simple invoice), in printed format and the inventories update is based on a reception note made by the trader when the transport enters the warehouse).

Interpretation

Controls carried out in deposits/ **wood processing units** are based only on **checking the records** of inputs vs. the records of outputs + existing stocks (which need to be inventoried at all processing phases).

THE EFFECTIVENESS OF THESE CHECKS IS REDUCED OR EVEN IN VAIN BECAUSE OF:

- High consumption of resources to carry out controls;
- The declared processing yields (which naturally depend on the quality of wood and the technical processing capacity) can 'cover' significant quantities of illegally harvested timber;
- Documents of origin for entries (i.e., "fictitious entries") can be easily "manufactured";
- The "inputs" and "outflows" of illegally harvested timber can be legalized by the breaches in SUMAL 2.0.

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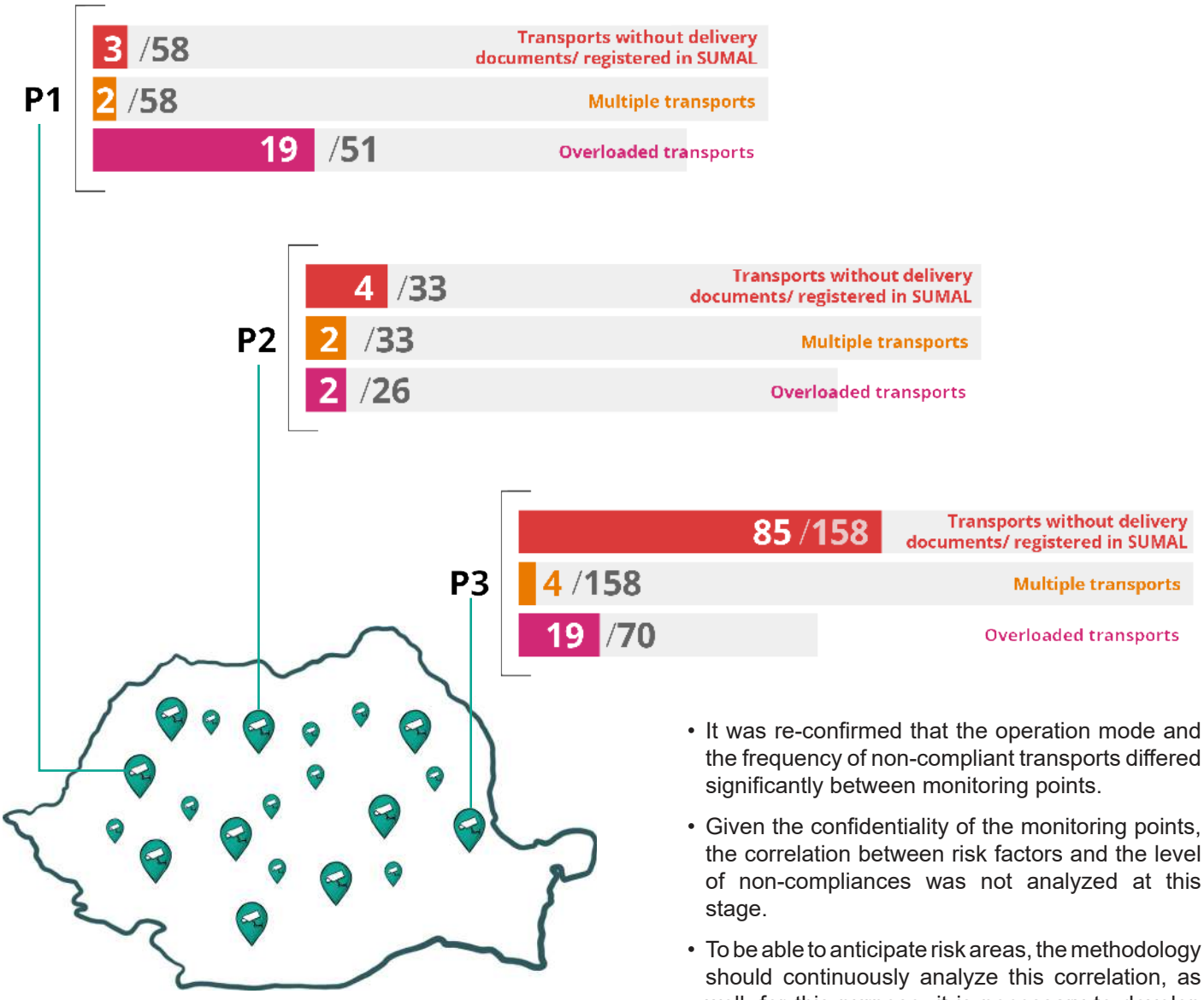
Comparative situation between the 3 monitored points (P1, P2, P3).



Note: the locations illustrated here are purely random.

- It was re-confirmed that the operation mode and the frequency of non-compliant transports differed significantly between monitoring points.
- Given the confidentiality of the monitoring points, the correlation between risk factors and the level of non-compliances was not analyzed at this stage.
- To be able to anticipate risk areas, the methodology should continuously analyze this correlation, as well; for this purpose, it is necessary to develop a monitoring protocol which should also have a relevant statistical coverage at national/regional level.

Interpretation

For future monitoring, data on the modus operandi and the level of non-compliances could be corroborated with the administrative situation of the forestry fund or the local socio-economic context and thus the risk factors may be objectively identified/updated, as well as the causes favoring illegal logging. This would allow a properly spatial prioritization of controls according to identified risk factors (including satellite alerts generated by SUMAL when finally operationalized).

Generalizations at national level on the prevalence of illegal logging are **not justified.**

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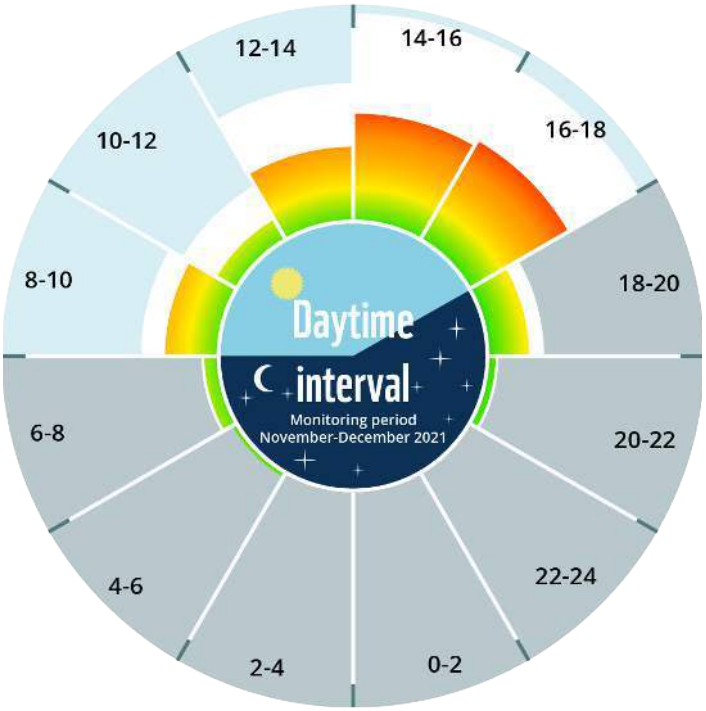
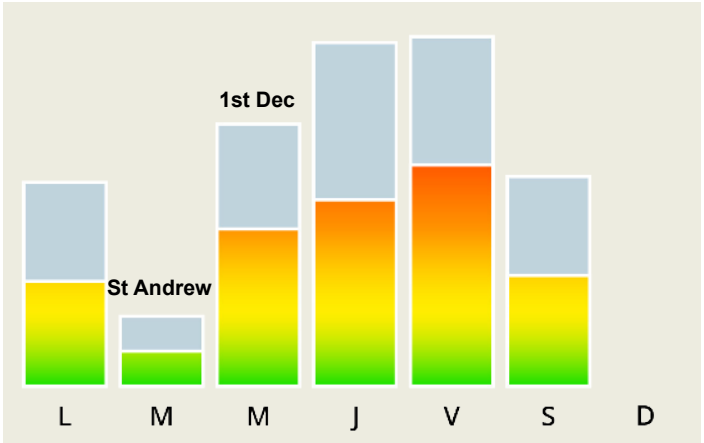
MODUS OPERANDI

Non-compliant transports over time intervals

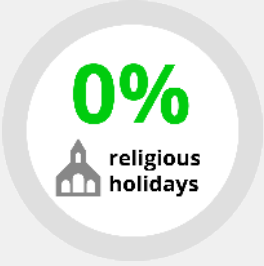


- **It is reconfirmed** that the frequency of non-compliant transports peaks between 16:00-18:00, outside the usual working hours (08:00-16:00) of the security and controlling authorities. It is also obvious the correlation with the working hours in the forest (the harvested wood is transported at the end of the working day).
- The fraction of night transports, and even more, the one of non-compliant night transports is insignificant. Thus, the opportunity/relevance of the decision to forbid issuing accompanying notices of wood materials from the harvesting site between 20:00 and 7:00 can be questioned.



Se reconfirmă faptul că frecvența cea mai ridicată a transporturilor neconforme este la final de săptămână (fiind evidentă și corelarea cu programul de lucru la pădure, respectiv numărul transporturilor).

It is reconfirmed that most of non-compliant transports were carried out outside the normal working hours of the security and control authorities.



It is reconfirmed that there are no non-compliant transports on free religious days (i.e., Sundays, St. Andrew)

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Conclusions & Recommendations based on the analysis of data gathered through field monitoring:

- **The relevance of prioritizing controls around the first timber placing on the market** is reconfirmed as the most effective measure, also **to obtain conclusive evidence and have a strong preventive role**.
- Illegal timber transports leaving the harvesting site **continue to be a major problem**. However, there are also significant differences regarding the frequency/ level of non-compliances from one monitoring point to another. This leads to the conclusion that thematic control plans need to prioritize **risk areas related to the prevalence of illegal logging**. It is very important to understand WHERE controls should be directed for spotting the high-risk areas.
- Can be observed that illegal transports take place according to **predictable patterns**, when the modus operandi and risk factors are known, which means that controls planning can answer questions like WHY and HOW checks need to be performed in order to be as effective as possible. This information, continuously updated through a national monitoring network, is essential for the development of an effective, dynamic control plan that follows a risk-based approach and ultimately leads to deterrence of these practices.
- **"Modus operandi" evolves** according to the vulnerabilities of the traceability system but also to the level of fines set for different non-compliances. That is why faking the declaration of the quantity of wood materials should be prioritized by establishing a system of proportionate and dissuasive penalties. The 10 m³ threshold to consider criminal forestry offence the transport of wood materials not accompanied by specific transport documents (showing the legality of their origin) must be reconsidered. In this respect, we propose that setting up penalties should follow reasonable thresholds, expressed cumulatively as a percentage of the declared quantities, but also a minimum threshold in absolute value.
- No matter how well the electronic timber traceability tracking system may be designed, it cannot produce effects unless it is complemented by sufficient, **effective controls that follow a risk-based approach.**
- Controls must be planned based on impartial **and transparent criteria** while control procedures must take into account the continuous dynamics of the modus operandi and the risk factors. To determine these variable parameters following an objective and transparent manner, **we recommend setting up an specialized team within the National Forestry Guard** that (starting from this monitoring methodology) would continuously analyze critical areas regarding timber traceability as well as the efficiency of the national system for combating illegal logging.
- The results of this kind of monitoring can be used as a barometer of the efficiency of national forest policies and may justify the relevance and necessity to continuously improve /adapt the legal framework to support the efforts **to prevent** illegal logging.
- **The potential of SUMAL in effectively fighting illegal logging in Romania has already been proven** (that's why SUMAL must be further maintained and improved (!). However, the results of this monitoring together with **other case studies** on SUMAL reporting do NOT allow us to appreciate that **SUMAL 2.0 really made the difference**
- SUMAL's efficiency is affected by the system's gaps. SUMAL should be designed as a preventive tool that can also address the **fraud against the declaration of quantities of timber** transported — currently the **most common mode of operation** whereby illegally harvested timber is placed on the market. To this end, **AI/IT solutions should be adopted so they can support an automated and swift verification of the data recorded in the system, and bring conclusive evidence in** case of overload or multiple shipments based on the same documents of origin.

During the first 10 months since SUMAL 2.0 was implemented, in only 39 cases (VPAs) out of over 100k logging areas, timber volumes that exceeded the initial estimation were reported (N.B. initial act for transferring timber right is an estimate of the volume with a certain statistical representativeness). Therefore, from a statistical point of view (considering the standard representability errors expressed by the dendrometry methods approved by OM 1323/2015), the number of these logging areas had to be of thousands/tens of thousands but only 39 cases were reported (very likely much of these partitions resulting from the timber harvesting through external service providers). So, SUMAL 2.0 can still "cover" the volumes of standing wood that exceed the quantities initially contracted under the VPA (which obviously express only an estimated value that may legally exceed ± 20 %).

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Monitoring the enforcement of timber tracking rules

In order to carry out a sufficient number **of controls, also considering the declared volumes** (see the arguments set out in "Context") we need a **modern**, simple and accessible **technique** to overcome the use of traditional tools and procedures for measuring wood. By keeping the current tools and procedures, the competent authorities will not be able to effectively verify even **0.1 % of the transports.**

The Digital Footprint of Transported Wood — the electronic transport seal — is a solution promoted by WWF to fight the faking of the declared quantities registered in SUMAL, as well as the multiple transports using the same documents, but also the "fictitious entries" (for details see attached material).

Romania must use the **funds available through the National Recovery and Resilience Program (NRR) to make these monitoring tools operational.**

The fight against illegal logging can sustainably take place only through an **integrated approach towards the causes** that generate it. We claim, in this sense, the need for a **real reform** of the entire system for combating illegal logging, as well as the development & promotion of some innovative tools based on **simplicity – transparency – efficiency.**

Why we are here
To stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature.
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