



# GreenPaths

EUROPEAN KNOWLEDGE HUB ON  
JUST TRANSITION PATHWAYS

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## Introduction

### Abstract

This case study examines the social impacts of large-scale conservation in Romania's Carpathian Mountains, focusing on the Foundation Conservation Carpathia's (FCC) 'Europe's Yellowstone' project. It addresses a critical research gap in understanding how green transition policies around forest conservation, under the EGD and Biodiversity Strategy, affect rural communities. Through mixed methods—including policy analysis, media review, and stakeholder interviews—the study investigates whether ostensibly progressive conservation agendas perpetuate green-grabbing and sacrifice zones. Findings reveal significant socio-environmental trade-offs: increased biodiversity protection and rewilding coincide with dispossession, criminalization, cultural erosion, and economic marginalization of local communities. The research contributes to broader literature on environmental justice by applying a 'green sacrifice zone' framework to non-extractive contexts, demonstrating how fortress conservation exacerbates inequalities. It concludes that convivial conservation can help prevent the risk of EU-backed transition policies replicating colonial patterns under a green guise.

### Keywords

Conservation; biodiversity; national parks; cultural heritage; ecotourism.

## 1 Overview

This case study investigates the social impacts of EU and national nature conservation and forest restoration policies in Romania, focusing on the controversial forest land purchases by the Foundation Conservation Carpathia (FCC) in the Făgăraș Mountains. This area, a 200,000-hectare biodiversity site in the Carpathians and the largest virgin forest area in Romania - the majority of which has been part of the Natura 2000 network since 2007 - contains significant populations of protected species and serves as a crucial reservoir of clean water for millions of people. Here, the FCC aims to create the most ambitious private conservation project in Europe: a private wilderness reserve marketed as "Europe's Yellowstone". The ecopark project directly affects 73,000 inhabitants living in 128 localities surrounding the mountain (Ministry of Environment, Waters and Forests, 2016).

Founded in 2009 by German ecologist and conservationist Cristoph Promberger, the private Foundation is a central actor implementing the European Green Deal (EGD) in Romania by restoring degraded ecosystems and rewilding Carpathian forests. Their strategic plan, launched in 2009 and supported by a Romanian Government memorandum in 2016, targets the protection of the area and promises sustainable development for local communities through eco-tourism and organic agriculture. So far, the foundation has purchased over 28,000 hectares (FCC, 2024) and its activities include reforestations, the rewilding of emblematic species (80 bison, 42 beavers, 110,000 trout), biodiversity monitoring, as well as measures to reduce human-wildlife conflicts through electric fences and compensation for damages (Ibid).

The role of the FCC must be understood within the contentious context of Romania's post-socialist forest restitution process, which unfolded in several legislative stages (1991, 2000, 2005) and was marked by corruption, clientelism and legal ambiguities (Sikoret al., 2009). This period facilitated a "timber rush" (Vasile, 2022), which saw thousands of cases of illegal restitutions and aggressive exploitation by new owners, which in turn triggered a powerful policy backlash. Romania's 2008 New Forest Code, sought to combat illegal logging, "unleashed new patterns of oversight, stricter controls and criminalisation of forest wrongdoers" (Vasile, 2022). This intense conservation turn created a political climate where, "the entire field of forestry seemed to be shrinking under the pressure of tight laws" (ibid). This domestic context dovetails with the launch of the EGD, whose Biodiversity Strategy 2030 and Regulation on land use, land-use change, and forestry (LULUCF) set ambitious targets for protecting old-growth forests and carbon sinks, with the EU's Carbon Removals and Carbon Farming (CRCF) Regulation (EU/2024/3012) certification creating a framework for voluntary carbon credit markets. These EU directives directly inform Romanian policy, legitimising the strict protection model invoked by the FCC, which has positioned itself as a central actor in implementing the EGD through rewilding, promoting ecotourism, and launching pioneering projects like the Carpathia Carbon Finance Project.

The research uses the "Europe's Yellowstone" project as a lens to explore how these macro-level changes in forest governance impact communities' dependency on forest resources. It specifically examines issues of vulnerability, power dynamics and

socioeconomic impacts on small-scale agriculture, forestry, animal husbandry and common lands (composesorate and obști), alongside the criminalisation of local practices and threats to the rural social fabric. The study builds upon existing analysis by scholars like George Iordăchescu (2018, 2021a, 2021b), who has highlighted the FCC's role in “green grabbing” and “fortress conservation” and Vasile's work on the conflicts of forestry policy (2022; Iordăchescu and Vasile, 2023). Empirically, it offers new contributions by cross-analysing media, legal, and policy documents with a substantial number of interviews from diverse local stakeholders. Theoretically, it puts Environmental Justice studies on Green Sacrifice Zones (GSZs) into dialogue with the empirical findings from the Carpathians to understand the conflicts and injustices that can arise from top-down sustainability transitions and the implementation of grand environmental policies like the EGD. We foreground the case with the following statistics that provide a national context to the case study: 12.5% of Romanians cannot heat their homes adequately (EU-SILC/JRC, 2023); rural poverty risk is 41.7% (Eurostat, 2024); 18% of the population work in agriculture (ILO, 2023).

While existing studies have predominantly focused on the historical emergence and trans-local praxis of the FCC conservation model, this case study observes the same phenomenon through the lens of GSZs, thus contextualising it within recent EU green transition policies and shedding light on the multiple forms of environmental injustice suffered by local communities in the Făgăraș Mountains. In this sense, it makes a distinct contribution by applying the critical lens of GSZs to biodiversity conservation. While this concept has typically analysed the damages of “green extractivism”, we demonstrate that a similar sacrificial logic—concentrating socio-ecological costs in a specific locality for a purported environmental good—is operative in the EU's flagship forest conservation policies. In this sense, we build on the logic of Ipsen and Lequieu (2024, p. 532) who state that the concept applies “to a specific geographic location where socioecological life is rendered dispensable by and for those with relatively more power than those impacted”.

## 2 Research questions

Following GreenPaths overarching research questions, this case asks: How do forest conservation policies impact rural communities in Romania? What are the policies that favour forest conservation in Romania? Who are the winners and losers of these changes? What are the anticipated costs and benefits of Europe's Yellowstone? How is civil society participating in the promotion or critique of such changes? Who are the key actors and how are they responding (e.g. institutional/policy; local/community; external actors)?

In order to answer these questions, this study employs the concept of “green sacrifice zones” (GSZs) (Brandajs, 2025; Scott and Smith, 2017; Zografos, 2022; Zografos and Robbins, 2020;) to analyse the socio-ecological impacts of green transition policy—especially biodiversity and forest conservation policies—as experienced and portrayed by different stakeholders in the region. Drawing on Environmental Justice and Political Ecology literature, the concept of GSZs emerged in the wake of recent (US and EU)



Green Deal proposals and transition agendas to expand the idea of conventional “sacrifice zones” (Juskus, 2023), to “include places and populations that will be affected by the sourcing, transportation, installation, and operation of solutions for powering low-carbon transitions, as well as end-of-life treatment of related material waste” (Zografos and Robbins, 2020, p.543).

Where GSZs are largely associated with “green extractivism” and socio-ecological damages, injustices and losses linked to green mining and the extraction of renewable resources (Dunlap et al., 2024), the gap in research this case study investigates is the concept of GSZs in environmental or biodiversity conservation projects. Conservation is more commonly mobilised as an oppositional framework to extractivism and is associated with potential solutions to the environmental harms and the sacrifice of socio-ecological well-being caused by extractive infrastructures. Whilst this may seem counter-intuitive, as Le Billon affirms (2021, p.879), throughout the past three decades affinities between extraction and conservation have been growing; they go “beyond opportunistic funding and green-washing”, demonstrating “readiness to dispossess in the name of a 'greater cause', whether through de-humanised understandings of biodiversity or false promises of economic development. While potentially progressive, the agenda pursued by the conservation-extraction nexus is at risk of facilitating the opening up of lands to large-scale extraction, while closing others to traditional livelihoods and communities”.

The case study adds to understanding of a key dichotomy in the Anthropocene conservation debate that is reflected in green transition policy: between a ‘neoprotectionist’ approach that argues for ring-fenced conservation areas that separate humans and purify nature and a ‘new conservation approach’ that centres a sustainable interdependence of human and non-human nature (Buscher and Fletcher, 2020). Within the first approach, our study investigates the impacts of ‘fortress conservation’ and the emergence of new forest feudalism in the Romanian forest policy context, whilst in the second realm, our research is inspired by ‘convivial conservation’ frameworks (Buscher and Fletcher, 2020; Iordăchescu, 2022) to explore post-capitalist concepts of conservation that seek to build on and protect both the natural environment and the historical, sustainable, silvicultural practices of local populations, thereby challenging recognitional and distributional injustices in the commodification of nature for profit. As Iordăchescu (Webinar, 2025), argues, the depiction of virgin forests and research sanctuaries in the Carpathian Mountains is built on mythologies of nature purification and erasure of the historical footprint of the local population.

We apply our research questions and mobilises the GSZ analytical perspective for addressing the European Yellowstone mega-conservation project for three main reasons: 1) the concept emerged from current EGD and green transition policies, making it a tool to diagnose the national and local consequences of this policy framework; 2) it aims to critically analyse “green” rhetoric and practices, the multiple forms of socio-environmental injustices suffered by human and non-human agents in specific affected areas; and 3) it highlights alternative (inclusive, democratic, decolonial, bottom-up, place-based) knowledge and practices of eco-social transformation that emerge from the resistance of local communities. Understanding GSZ as “sites of concentrated environmental injustice” (Juskus, 2020), this case analyses the multiple forms of

environmental injustices (procedural, distributional, and recognitional) in place in conservation areas and natural parks such as the Romanian Yellowstone, especially in the Făgăraş Mountains.

### 3 Methods

This mixed-methods study combines the analysis of specialised literature, media analysis and the analysis of the legislative and public policy framework, with primary data obtained from 14 interviews with local residents (forest owners, foresters, business owners) living near the forests owned by FCC in the Făgăraş Mountains, former forestry/forest administration/FCC employees and locals in civic leadership roles (president of Nostra Silva, leader of forest commons, local municipal officials), as well as the testimonies of FCC representatives during public events and meeting in Romania, held in 2019, 2023, and 2025. Content analysis on media reporting was conducted on how the projects of the FCC were reflected in the national, international and local press. Analysis of the data identified two main overarching tones identified in the exposure of the green transition in Romanian mass media: triumphalist and critical-investigative. The media analysis targeted a corpus of 70 articles and reports about Conservation Carpathia, published between 2014 and 2025. The materials were selected from the national press (Adevărul, Libertatea, Digi24, România TV, Antena 3, ProTV etc.), the local press (Monitorul de Făgăraş, Jurnalul de Argeş), and the international press (The Guardian, El País, National Geographic, New York Times etc.). In total, 35 articles from the national press, 20 from the local press, and 15 from the international press were included. We also analysed three video and audio recordings from “public debates” organised by FCC with local authorities.

The primary research in the Făgăraş-Rucăr-Lereşti-Nucşoara area was carried out during two field trips, in March and July 2025. During this period, 14 semi-structured interviews were conducted with a diversity of local actors: two mayors (male), three communal leaders (obşti presidents: two female and one male), four forest owners (two female and two male), one former FCC employee (male), one tourism entrepreneur (male), two foresters and one leader of a forest owners’ organization (male). Selective sampling targeted individuals according to their relevance to the forests, small-scale forest industry, conservation and their interactions with FCC projects and lands FCC.

An interview script was developed and refined with questions designed to align with specific dimensions of environmental justice (distributional, procedural, recognitional), grouped around themes that relate to processes of social impact: land-identity, recognition, skills, capabilities; difficulties/ losses; perceptions of fairness/justice, distribution of benefits, social trust; civic/political participation, belonging to a community/association. All participants were informed about the purpose and methods of the research and signed consent forms. The interviews were coded and analysed using Excel and MAXQDA software, based on a thematic framework structured into four major dimensions: identity and relationship with the land; difficulties and losses;

perceptions of justice and benefit distribution; civic and political participation; as well as perception of the press and the fairness of media coverage of environmental issues.

Drawing from the GreenPaths analytical framework, the social impacts the case investigates include injustice and inequality, Loss and Damage, governance/policies and labour. The core concepts of the case include sustainable growth, decarbonisation and green grabbing. The case study identifies dimensions of socioenvironmental justice most commonly referenced in association with a green or just transition (distributional, procedural and recognitional) (see GreenPaths report D1.2 for summary and bibliography). The GSZs lens—previously used to examine injustices and harms caused by green extractivism—is deployed here to assess whether current EGD and Romanian conservation policies, while claiming to protect the forests from humans, are in fact perpetuating the sacrifice, marginalisation, and dispossession of rural communities whose subsistence directly depends on that very environment.

## 4 Findings and results

### The EGD and the Carpathian Conservation Project

EU policy, particularly the EGD, has been a key driver for biodiversity conservation through a neo-protectionist approach based on “strict separation of an allegedly wild nature” from traditional land uses (Iordăchescu, 2022, p. 159). The EGD’s Biodiversity Strategy for 2030 introduces clear targets of 30% protected areas, 10% strictly protected areas, and the full protection of old-growth forests, creating new conservation pressures in regions such as the Carpathians (Iordăchescu, 2022). This marks a paradigm shift from earlier strategies by setting fixed quantitative objectives. Moreover, to achieve climate neutrality by 2050, the EU Carbon Removals and Carbon Farming Regulation (2024) establishes a voluntary EU-wide certification mechanism for carbon removal and capture, which includes afforestation and sustainable forest management. However, as Bogovegic (2024, p. 208) recognises in the carbon farming context, there remain “major legal questions concerning the motivation, construction, operation and public engagement relating to carbon removals”. These EU directives directly inform Romanian policy. The Integrated National Energy and Climate Plan (INECP, 2024) consolidates climate adaptation strategies and reaffirms that “Romania’s energy ambitions are indivisibly linked with the EU’s broader energy and climate policy objectives”. Similarly, the Romanian National Strategy for Forests 2030 aligns with the EGD, aiming to expand protected forests and combat illegal logging under the New Forestry Code (2024). Romania currently reports 23–25% of its territory as protected areas but less than 1% is strictly protected, and it is legally required to identify mechanisms to reach the 30%/10% EU thresholds by 2030.

The government supports the FCC’s initiatives as a way to demonstrate to the European Commission that Romania is delivering on these European biodiversity protection standards. These new EU conservation and climate policies have thus legitimised the strict protection model invoked by the FCC in the Carpathians. In the FCC’s discourse,

and in capitalist conservation more generally (Vesalon and Anghel, 2024), ecological catastrophe is presented as justification for private conservation interventions as the “only solution” to environmental degradation and land abandonment (Iordachescu, 2021; Swyngedouw, 2010). Their philosophy is outlined by former board member Erika Stanciu: “Romania is a rich country, and we have the chance to put these riches on the market in a sustainable way, for a better life. We want an alternative development that does not involve senseless logging or unnecessary investments, but the capitalisation of what we have, to become the most beautiful country in Europe and to earn money from it” (Nostra Silva, 2019).

The FCC secured major EU funding in 2019 for the €27.6 million LIFE project for wilderness creation and ecotourism, which supports local producers via initiatives like the “Roadele Munților” Food Hub. Beyond large grants, FCC has created its own Carpathia Fund / Small Grants Programme, committing over €1 million to local businesses and community initiatives. Furthermore, the Foundation is launching pioneering projects like the Carpathia Carbon Finance Project. This project has been registered under Verra's Verified Carbon Standard (VCS) - the world's leading standard-setter for voluntary carbon credit markets - and positions FCC to compete in the future voluntary carbon credit market established by the EU CRCF. The third-party verification processes for carbon certificates under the new EC policy are yet to be confirmed, but they could incorporate already established, independent verification standards (i.e. Verra's VCS to fulfil (at least part) of the criteria as an 'EU recognised scheme'). There is recognition that the EU needs to “develop tailored certification methodologies for different types of carbon removal activities” (Bogojevic, 2024). Even without this added value, the FCC's annual budget exceeded 13 million euros by 2024, with its funding split as follows: Private Entities and Foundations (40%), other private sources such as individuals and corporations (45%), and Public Funds (10%) (FCC, 2024). The transposition into national legislation of the Habitats Directive (92/43/EEC) and Birds Directive (2009/147/EC) allows the active involvement of NGOs in the monitoring and management of Natura 2000 sites. Foreign tourists are especially appreciated because they are willing to pay 250 euros per night for a guided tour. According to one former FCC employee: “Our role was to lead them to the animal observatories and to explain to them the purpose of the project, namely the protection of flora and fauna, and to explain how the restoration of areas affected by these clearcuttings is carried out” (Interview 8).

The FCC uses multiple financial vehicles and registered commercial companies to manage land acquisitions, tourism activities, and related operations. This structure allows it to attract capital, supplementing donations and grants with revenues from the commercial exploitation of assets. FCC is financially supported by a transnational network of philanthropists and international institutions. Among the funders are the Wyss Foundation, UBS Optimus Foundation, ING Bank, as well as conservation organisations like Frankfurt Zoological Society-US (FCC, 2023). Moreover, in Romania, the foundation benefits from the support from prominent environmental NGOs like the WWF, Greenpeace, ProPark-Foundation for Protected Areas, as well as the Natura 2000 network, and has cultivated partnerships with biodiversity specialists, such as the Romanian Ornithological Society. Such alliances illustrate what Holmes (2012) describes

as “philanthrocapitalism”, whereby conservation and philanthropy intertwine with capitalist logics, offering both legitimacy to economic actors and new market opportunities for the expansion of capital. As Vesalon and Anghel (2024) demonstrate, this model relies on alliances between global NGOs, philanthropists and private capital, as well as on favourable media attention. Indeed, mass media, has played an important role in portraying FCC as a win-all project for environment, the economy, investors, the government and local communities.

In our analysis we observed that in the mass media, the project is reflected positively, even enthusiastically in 70% of cases. Ever since a 2011 campaign organised with WWF and Greenpeace to denounce illegal logging and Romania’s loss of forest, the mass media started portraying forests as victims, activists and journalists as heroes and local communities as offenders (Vasile and Iordăchescu, 2022), legitimising FCC’s continued acquisition of lands and disseminating their philanthrocapitalist philosophy. In 2023, The Guardian described the FCC plan as “a Yellowstone for Europe” emphasising the spectacular biodiversity and the reintroduction of bison as “a historic success” (Dunford, 2023), while El País reported with an epic tone in 2024: “People in the villages thought we had found gold or uranium. They could not imagine that we would invest so much money just to protect nature” (Costa, 2024). This triumphalist tone is reflected nationally, for example, Libertatea headlined as early as 2018: “Foreigners who are reforesting our country because we have something unique” (Ionașc, 2018), presenting the massive forest acquisitions as an act of visionary philanthropy. Only 30% of the articles offer a critical-investigative approach, which predominantly in the local press, documenting community discontent and accusations regarding the way forests were acquired. Nationally, in 2016, the Antena 3 investigation, “Premeditated Heist” documented illegal restitutions, clearcutting and reselling of lands to FCC, raising the question of whether European funds were indirectly financing deforestation (Puiulet, 2014). Other local articles use strongly dramatic headlines, such as “The Yellowstone Business: The Forests of the Făgăraș Mountains in the Hands of the World’s Rich. The Conservation Carpathia Foundation Does Not Give Up” (Monitorfg.ro, 2019), suggesting a grabbing of resources by global actors. Monitorul de Făgăraș consistently published articles with a similar tone: a piece from 2019 headlined that FCC operates as “a parallel authority” with power over waters, pastures and forests, whilst more recently, a 2024 article titled “The Făgăraș Mountains Are Not for Sale” reflects the ongoing opposition of forest owners.

An FCC-funded socio-economic assessment report (Ungureanu and Promberger, 2018) indicates the FCC’s main narrative, which champions the Carpathia project’s incontestable benefits, namely, a rise in tourism revenue, the creation of more stable and higher-quality employment opportunities in tourism compared to precarious work in forestry. Furthermore, the report frames environmental safeguards, such as the legal restrictions leading to a decline in grazing, as positive outcomes for conservation. The Carpathia Forest Carbon Project validation report (Carbon Check, 2023) constructs a similar narrative of comprehensive benefits, encompassing both social and environmental spheres (ibid). This perspective, however, stands in stark contrast to the lived experiences and testimonies of local residents. Their accounts reveal a counter-

narrative of multifaceted injustices, highlighting tangible and intangible losses and a perceived exacerbation of social and economic inequalities brought about by this conservation process.

### Distributional injustice - dispossession, criminalisation, loss of local livelihood and inequality

The establishment of the Carpathian Project has been fundamentally predicated on a process of large-scale land acquisition that has concentrated privately owned and communal forests into private hands. As articulated by Lordachescu (2025), this process has alienated areas previously vital for grazing, transhumance and other low-impact livelihoods, leading to social unrest. Unlike Yellowstone, the world's first national park, created by a federal decision, owned by the U.S. government and managed by the National Park Service with public funding, the FCC project in Romania is a private initiative, based on land acquisitions and market mechanisms, which fuels local perceptions of green-grabbing and disputes over resource control.

Furthermore, there is evidence of questionable and, in cases, demonstrably illegal processes that occurred through FCC's forest land accumulation processes. In one specific case, a local resident (farmer/forester) reported waking up to find they couldn't recover an entire mountain because it had been illegally restituted to others, who then sold it to FCC (Interview 9). They described the restitution process as unjust and corrupt, with land given to others through speculation. They had to self-advocate, challenge the illegal sale and have fought and reclaimed some, but not all of their family's confiscated forest lands, whilst all lands remaining subject to external regulation: "FCC has to give their approval for any intervention I want to do in my own forest, which is now part of the national park" (ibid).

Law 1/2000, which restored half of Romania's forests to private and communal ownership (obşte or composesorate), is now overshadowed by allegations of corruption and a shift toward concentrated ownership under the FCC, leading to unjust restrictions on fundamental livelihoods as well as to the dispossession and displacement of small and medium-scale timber economies in the name of rewilding and forest protection. One local official, formerly in a civic leadership role spoke about private ownership and restrictions: "Locals own very little, maybe 75ha in total. Most of the forest is communal. Individuals can't log because silvicultural planning is only legal above 100ha" (Interview 6).

The consequences are tangible and severe. Residents now face over-regulation, punitive measures, and a litigious environment, especially after Romania's revised New Forest Codes (2015, 2023), which intensified anti-logging enforcement and criminalisation of forest-related activities. Additionally, to fulfil its ambitions of leading the global fight against climate change and biodiversity loss, the EU, through its new Forest Strategy (2021) and the EGD, is emphasising the need for comprehensive forest protection as vital for a renewed economy and public welfare. However, this "green growth" path comes with the demands of intensified law enforcement and further criminalisation of what is

now considered “illegal” logging. In the Carpathians, resource securitisation and criminalisation have brought to the growing of the use of physical as well as insidious forms of violence in the name of conservation, deepening rural vulnerabilities (Iordăchescu and Vasile, 2023).

Litigiousness on the part of FCC can also be underlined by its attitude to the Federation of Forest and Pasture Owners, Nostra Silva, which represents the historic communities of the Făgăraş Mountains and has been a consistently critical voice against the project. In 2017, the FCC sued Nostra Silva, accusing it of defamation and seeking damages after the federation publicly criticised FCC’s ‘Yellowstone’ plans. Nostra Silva drew on testimonies of local residents and officials, whereas FCC brought in biodiversity and conservation specialists from organisations like the WWF, Natura 2000 and GreenPeace to further solidify and internationalise their case. Although the first hearing ruled against Nostra Silva, the association won its appeal—a decision later confirmed by the High Court. The final ruling in their favour drew on international law and European Court of Human Rights jurisprudence regarding freedom of expression (Nostra Silva, High Court of Cassation and Justice, 2017). A local representative in a civic leadership role for Nostra Silva identified the case as an example of a strategic lawsuit against public participation or SLAPP lawsuit, aimed at discouraging public dissent: “They hired big law firms, two lawyers came to every hearing, they spent hundreds of thousands of euros without batting an eye. For someone unfamiliar with the justice system it would have been difficult and intimidating” (Interview 14).

During public meetings, forest owners consistently highlighted how these forests provide livelihoods and resources and are being exploited within legal quotas. One local resident (forest owner) questioned the lack of a social impact assessment on the part of FCC: “When you proposed this project, did you carry out a social impact study for the area? A study that would include, concretely, fuel supply, the entire community heats with firewood, the need for timber for construction, and the food obtained from grazing?” (Nostra Silva, 2019). These questions are amplified by the reality that firewood is the primary energy source for roughly half of Romania's population living in rural communities. According to Iordăchescu and Vasile (2023, p. 2114), the criminalisation of illegal logging has been a key driver of a firewood crisis, thereby pushing energy poverty as the most common instance of everyday violence in the [Carpathians] region”.

The historic relationship with the forest for firewood, grazing and picking mushrooms and berries is being replaced by a regime of conditioned access, felt as an irremediable loss: “They put up barriers; we can no longer take the animals to pasture; we no longer have anything to say in forest management” (Interview 13). Within the neoprotectionist or ‘fortress conservation’ framing, discussion of the ring-fencing of nature is intended more figuratively. That said, some FCC lands can include physical fences or demarcation lines that are enforced by Park Rangers: “installing fences as temporary defence against livestock and patrolling the areas to prevent grazing” (FCC, 2019). The physical fences are perceived by some of the local residents (farmers/foresters) interviewed as mechanisms of exclusion from traditional grazing areas and wood-collecting spaces. People are forced to purchase firewood or bring it from other counties, whilst multigenerational shepherds can no longer traverse FCC-managed woods. As one local official formerly in a civic leadership role noted: “They expelled people from the forests.



No more berry picking, no more walks. They talk about 'sustainable development', but I've never seen any benefits for the communities. They just become land barons" (Interview 6). With the collapse of traditional livelihoods, villages once considered wealthy have begun to depopulate. As one local noted, any gains were short term: "People were forced to sell the forest, and they ended up with broken fridges, old TVs, and no land" (Interview 5).

One of the main impacts of dispossession processes is the erosion of community fabric and the exacerbation of pre-existing inequalities. The disproportionate impact is on the most vulnerable, particularly Roma communities. An FCC report showed that money from mushroom picking, a crucial income source for Roma, plummeted from 690,000 RON (c.€136k) in 2016 to 305,000 RON in 2017 (c.€60k), coinciding with the Foundation's land acquisitions (Ungureanu & Promberger, 2018). Now, instead of self-sufficiency, the Roma community receives monthly aid, a dynamic one forest administrator described as manipulative: "When aid comes to our commune... there is always also a forester from FCC there, so that it's visible who is the boss" (Interview 5). Furthermore, FCC employees reported issues with Roma people stealing firewood. Rangers deterred them with tactics like smearing bear fat on their carts to spook the horses. The foundation then sponsored the Romanian Gendarmerie, which, along with controlled hunting grounds, has helped them secure the area, criminalising traditional practices.

The opening of new financial frontiers like the voluntary carbon credit market further exacerbates local disenfranchisement. In Nucșoara, the FCC proposed a sponsorship contract to the town hall for the management of 230 hectares of communal forest, offering €125 per hectare annually against future carbon credits. FCC representatives present the project as a way to profit from the willingness of companies and the EU to pay for carbon sequestration and as a form of support for the Nucșoara community, enabling more communities obtain such credits. This position is echoed by the local mayor, who stated, "Our forest emits oxygen, right? ... We have money in the air. So, we can take money from air. We can have 20 billion for development just by selling on the stock exchange." Yet, this offer is made on the condition of a total logging ban and exclusive FCC administration, a stipulation that sparked dissent in the community. Locals accuse officials of corruption and describe public consultations as a sham, claiming they were "announced on the sly, full of town hall employees and FCC sympathisers, without the villagers being truly represented" (Interview 2). Critics point out that with 28,000 hectares, the FCC could generate an annual income of €3.5 million from carbon credits, revealing a primary motive: "FCC is not doing this for the sake of the environment, but because it has found that a lot of money can be made from this story. And the stake is for the administration of this national park to be with FCC" (Interview 7). This perspective, which encompasses FCC practices beyond carbon credit projects, was starkly summarised by a local official in a civic leadership role during an April 2025 high-level meeting in Rucăr, between mayors, members of the local council and FCC representatives. After complaining about the lack of visible benefits and increasing restrictions, he stated: "What benefits do I have with Christoph Promberger? Honestly, this is my principle: from now on I want to sell myself more expensively. The forest and the land have already been sold; I can no longer take them back. But at least from now on we should also obtain something" (Field Notes: FCC Rucar Meeting, 2025).

## Procedural Injustice – disempowerment, manipulation and intimidation

The implementation of the Carpathian Project is characterised by a profound procedural injustice, where the systematic disempowerment of local communities starkly contradicts the FCC’s narrative of conducive partnership. Local residents and officials consistently report being excluded from meaningful decision-making, facing a “very systematic disregard of local populations and rural inhabitants” (Iordachescu, 2025). This dispossession was marked from the beginning by a lack of transparency, as seen when the FCC, years after promoting the national park memorandum, invited mayors and owners to a meeting outside of their existing acquisitions, in a location where they sought new land. This led to tense confrontations and accusations that their true aim was to “buy even more”. This top-down approach has fostered a widespread sense of alienation. One local official in a civic leadership role claimed that “70% of the community opposes the FCC project” (Field Notes: FCC Rucar Meeting, 2025) and condemned its high-level governmental integration without prior community consultation. The decision-making process is widely perceived as a formality; as one resident (farmer/forester) starkly put it, “Public consultations are just a formality, between mayors and FCC, not the people” (Interview 5), a sentiment echoed by a local resident in a civic leadership role, who felt debates were “for show, so things look good in Bucharest and Brussels, but we, the villagers, don’t matter” (Interview 2).

The historical region of Muscel, in the South of the Făgăraş Mountains, has been particularly impacted by the project. Here, as explained by Iordachescu (2021), the government's process was notably top-down, as it organized no consultation meetings either before or after its 2016 memorandum. The resulting resistance involved commons representatives and local mayors. Many of these stakeholders demonstrated their opposition by signing the 2016 Resolution of Șercăița, which demanded the government halt the park's establishment and respect their property rights. Another highly impacted group is the Roma (Rudari), who never appear invited to the negotiation table (Iordachescu, 2021).

This exclusion is compounded by a sense of manipulation and the arbitrary imposition of rules that is strongly repeated among the local residents and officials interviewed. The creation of protected areas, national parks and Natura 2000 sites is described as an opaque, bureaucratic process by a former local official in a civic leadership role: “They made a national park without asking anyone. All drawn in offices” (Interview 6). Absurdity is found in the arbitrary drawing of borders through one village that places a church and kindergarten inside the regulated zone but not the town hall, leaving people unable to “even change the roof on their barn without approval” (ibid nr 7). In another case, grazing was abruptly banned due to the alleged presence of a rare species of thyme, a measure locals found irrational since “animals had grazed there since the Dacians” and which later proved futile when nettles subsequently grew and killed the thyme anyway (ibid).



The feeling of powerlessness is exacerbated by financial schemes like carbon credit contracts, such as in the case of Nucșoara, where the foundation has already purchased several thousand hectares of land. In 2023, local residents from Nucșoara gathered at the town hall meeting and questioned FCC's aforementioned proposition to 'manage' communal forest with financial promises based on potential carbon certificate trading revenue, that came with imposed conditions (ban on logging, exclusive FCC administration, restricted access). Where such deals are negotiated with mayors, this sparked dissent among citizens who feel unheard and accuse the foundation of functioning as "a state within a state" marginalising local voices (Interview 5). As one frustrated local in Nucșoara said: "We came to the town hall before and [they] told us we were stupid, that we don't understand, that we are just a small group with political interests", going on to ask: "What trust can we have in Carpathia when so many localities are taken over by them?" (Field Notes: Nucșoara, 2023).

Beneath this disempowerment lies a strong undercurrent of mistrust, with repeated accusations of corruption, deception and long-term strategies of co-optation. Local officials suggest that FCC operates with immense patience and financial power, working "through proxies" such as commercial companies and research institutions. Their strategy is perceived as a long game: "They wait for the old folks to die and try to win over the young" (Interview 6). This is actively pursued through consensus-building strategies that many in the community view as insidious. The FCC organises educational programs in schools, offers scholarships and hosts events like the annual Făgăraș Fest, an advocacy platform explicitly used to rally support for the national park. These public relations efforts are a source of deep anxiety for residents, who worry that the new generations are no longer attached to the forest. They witness their own children influenced by these programmes, as one local official in a civic leadership role explains: "Now our children come home in electric cars and ask us why we want to cut the forest. We told them they will end up strolling through our properties like at the zoo" (Interview 7).

Finally, for those who resist, the experience is often one of intimidation and bullying. Residents involved in community resistance report tactics of humiliation and threats of legal proceedings, creating an atmosphere of fear. This, combined with the perceived pacifying tactics of youth funding and educational programs, is described within the community as fostering a coercive environment where dissent is stifled. While these initiatives could be presented by FCC as evidence of community investment, this study's findings highlight a community experience in which such measures are seen alongside a failure of justice and state institutions to offer protection, perpetuating a cycle of broken development promises. FCC-based alliances between local and global NGOs, philanthropists and private capital have led to a shift in decision-making power from villages to transnational actors (Vesalon and Anghel, 2023); transforming nature into a financial and tourist asset legitimised through narratives of wilderness restoration and ecological crisis. The benefits, as one local official summarised, are perceived to be for "International elites and foreign interest groups", who are seen as the winners, whilst "Local communities are the losers: they're losing land, resources and any chance at development" (Interview 6). This pervasive sense of disenfranchisement, manipulation

and intimidation lies at the heart of the procedural injustices engendered by the conservation project.

### Recognition injustice: Erasure of socio-ecological heritage, commodification of nature, and new human-wildlife tensions

A fundamental recognition injustice underpins the Carpathian Project, where FCC systematically overlooks and devalues the historical, cultural and sustainable relationships that local communities have cultivated with their environment for centuries, especially through their forest commons - ‘obște’ or ‘composesorate’ - considered by Lordachescu (2025) as democratic institutions and veritable conservation actors, serving as safety nets for communities and investing in local infrastructure. This dynamic was laid bare during the public presentation of the project “Together we restore nature for the communities of the Făgăraș Mountains” (2019), when FCC’s executive director, Barbara Promberger, expressed that she was “impressed by the intact nature you have here and which Romanians have protected<sup>18</sup>, contrasting it with developed countries like Germany and Austria that “have lost these habitats”. This narrative, however, ignores the very agents of that protection. As one local official in a civic leadership role counters: “The people in these villages have lived in harmony with nature for hundreds of years; that is why there is still something to protect now, because people have left things undestroyed” (Interview 7).

For residents, the *composesorate* are deeply tied to community identity, history and continuity as a traditional institution safeguarding community forests. Viewed from this communal and embedded perspective, the forest is not a wilderness to be discovered but the bedrock of “life and tradition”, a sacred heritage passed down through generations. As one local resident (farmer/forester) explained, “For us, the land is sacred, not just a resource. It is about heritage: it is from my father, from my grandfather” (Interview 11). This profound, place-based knowledge and care conflicts with media narratives that glorify a pristine ‘wilderness’ for the Yellowstone of Europe project, leading to frustration that “no one came to write also about what people think” (Interview 5). This process effectively erases the social history of the forest, reimagining it as an aesthetic and financial object for external valorisation.

This lack of recognition creates a stark contradiction in FCC’s actions. While the foundation discursively celebrates human-nature interactions in projects like the “Architects of Nature” themed trail, which illustrates the role of humans, bison and beavers as co-creators of the landscape, it simultaneously undermines the tangible practices that constitute those interactions. For instance, whilst promoting traditional activities for tourism, FCC representatives have been bothered by the practical realities of local life, such as cows roaming freely, with one former employee complaining: “All day long the cows came and you had to chase them away... The locals didn’t keep them in check” (Interview 8). This exemplifies a model where traditional practices are commodified into eco-tourism, while simultaneously being restricted and criminalised in practice. The result is a profound intangible loss for the community—a severing of the

connection to land, nature, and heritage based on a system of trust and shared resources. A former local official in a civic leadership role emphasised this deep bond: “People are deeply connected to nature in rural and mountain areas... I rely on this bond with nature” (Interview 6), a bond now compromised by a conservation model that ‘protects’ nature from its historical caretakers. This ‘neoprotectionist’ approach to conservation (Buscher and Fletcher, 2020) deliberately separates human and non-human nature, both figuratively and physically, creating “resource sanctuaries” that obfuscate the human footprint in ‘virgin’ forests (Iordachescu, 2025), consolidating land ownership and forming a perverse new model of forest feudalism.

The failure to recognise existing, balanced human-nature relationships has also dangerously altered the ecological dynamics of the region, most notably leading to an increase in dangerous wildlife-human interactions. On both slopes of the Făgăraş Mountains, locals report living in fear due to a surge in bear attacks. Shepherds and farmers have lost animals, and many feel “locked in their homes out of fear”, with one resident stating: “Until the other day we used to take the cow to pasture, now I sit with the fear of the bear behind the house” (Interview 12). This dissatisfaction is compounded by the fact that the FCC was accused of being involved in drafting the 2016 law that banned bear hunting and now manages several hunting grounds. In the eyes of locals, this policy has directly led to an explosion in the bear population and the subsequent attacks, for which the foundation is often blamed directly. This sentiment is exacerbated by a perception of biased media coverage, as a former forestry employee recounted: “The mass media was paid... They only come to the foundation’s events” (Interview 13).

Lack of recognition is reproduced also in the carbon credit voluntary market engaged by FCC. While presented by FCC as an opportunity for local economic growth and development, there is a growing literature that points to the risks associated to carbon and biodiversity credits, especially to the lack of integration, in such schemes, of “needs, values and perceptions of rights holders”, thus reproducing inequalities and multiple types of injustices (Clifton and Manez, 2025; see also Fletcher and Buscher, 2016, “The PES Conceit: Revisiting the Relationship between Payments for Environmental Services and Neoliberal Conservation”).

The various forms of environmental injustice experienced by the local population in the Făgăraş Mountains sparked social resistance against the FCC and its conservation project. However, as Iordachescu (2021) contends, this resistance should not be interpreted as opposition to conservation per se. He emphasises that local communities have cultivated sustainable resource management for centuries through traditional commons. Instead, this skepticism should be read as a rejection of top-down conservation models that seek to preserve an idealised and commodified “wilderness” - a narrative alien to local lived experience, which disregards both historical land-use practices and the cultural significance of these landscapes for their inhabitants

## 5 Main results

This case study reveals that the implementation of top-down EU green transition policies, as channelled through FCC's ambitious Europe's Yellowstone project, has created a green sacrifice zone in Romania's Făgăraş Mountains. While advancing biodiversity targets, this model of philanthrocapitalist conservation generates severe socio-environmental injustices, fundamentally altering the region's social fabric and power dynamics. The main finding is that the pursuit of strict wilderness protection, legitimised by the EGD (primarily the EU Biodiversity Strategy 2030 and CRCF certification), has systematically privileged global ecological and financial values over local socio-ecological systems, producing clear winners and losers.

The primary impact is a triad of interconnected injustices. First, distributional injustice manifests through processes of green grabbing and dispossession. The large-scale, often contentious acquisition of forest land has restricted access for traditional livelihoods like grazing, timber collection, and foraging. This impact is disproportionately felt by the most vulnerable, such as the Roma community, who have seen a dramatic decline in income from activities like mushroom picking, pushing them into greater dependency on external aid. Tangible losses are therefore manifest through communities forced to purchase firewood and through rural depopulation, while new financial ventures like the Carpathia Carbon Finance Project risk further alienating locals from potential benefits. Second, procedural injustice is rampant, as decisions are made through opaque, top-down processes. Local communities report being systematically excluded from meaningful consultation, with public debates perceived as formalities for external investors and policymakers. This disempowerment is compounded by consensus-building strategies that target youth and create dependencies, alongside intimidation tactics against dissenters. Third, a profound recognition injustice occurs through the erasure of local heritage. FCC's 'wilderness' narrative overlooks centuries of sustainable stewardship by local communities, framing their ancestral lands as a pristine nature to be saved. This devalues their knowledge and severs their cultural connection to the forest, which is re-imagined as a commodity for ecotourism and carbon markets.

Consequently, the main "winners" of this green transition are transnational actors: the FCC itself, which consolidates power and access to new revenue streams; its international donors and partner NGOs; and global tourists who gain access to a curated wilderness experience. The clear "losers" are the local communities, who experience a loss of autonomy, resources and cultural identity. They face criminalisation of traditional practices, heightened vulnerability due to wildlife conflicts exacerbated by conservation policies and the erosion of their social fabric. Institutionally, the Romanian government acts as a key enabler, supporting the FCC as a vehicle to meet strict EU biodiversity targets. This dynamic has polarised civil society: while major international and national environmental NGOs promote the project, local community groups and a critical press offer a powerful counter-narrative that frames the process as an unjust form of dispossession and disempowerment.

The anticipated costs and benefits of “Europe’s Yellowstone” (actual or demonstrable, anticipatory or promissory) are thus distributed asymmetrically. The benefits – among which: progress on EU biodiversity metrics, carbon sequestration, and the creation of a wilderness reserve for science and tourism – accrue to global and national constituencies. Instead, the costs are overwhelmingly borne by the residents and local representatives of the Făgăraș region. They consistently report tangible and intangible losses and damages, which are underpinned by intergenerational knowledge and informed experience, culture, sense of place and ways of being. The case therefore demonstrates that without embedded community participation, socio-environmental justice (Iordănescu, 2022), even well-intentioned conservation policies can perpetuate the very inequalities the green transition aims to resolve, sacrificing local well-being for global environmental goals.

## 6 Discussion and conclusions

By analysing the ecotourism park in the Făgăraș Mountains, this case has shed light on a significant and under-researched aspect of the EU green transition: GSZs that manifest not through renewable resources extraction but through a renewed push for environmental conservation, forest rewilding, and the expansion and securitisation of strictly protected areas. The study's main contribution is to the environmental justice and political ecology scholarship on GSZs and conservation, and especially to the literature on the Foundation Conservation Carpathia (FCC) project.

The Carpathia Project, justified as a way “to repair the harm done by humans... by giving the land back to nature” (Iordănescu, 2021, p. 196), is analysed here as a new frontier of land control that mimics global green grabbing and relies on processes of “dispossession, rights transfer and securitisation of resources” (Ibid). Following Iordănescu (2021), the peripheralization of certain regions is central to this project, particularly the eastern EU’s imagined “green periphery” that emerged after the fall of the Soviet Union. Termed by the author as “The New Wild West”, this periphery is represented as a great opportunity for conservation (Ibid, p. 190), yet it has been characterised by growing “green violence” as a consequence of the hardening of law enforcement and criminalisation of illegal logging—a form of violence that has disproportionately targeted the most vulnerable, already marginalised rural communities, especially Roma (Iordănescu and Vasile, 2023). While environmental protection itself is not under critique, legitimate concerns persist regarding greenwashing and philanthrocapitalism. Central to this case are fundamental questions about whose “nature” is being prioritised, and who benefits.

This study has showed that the FCC project has been backed by EU conservation policies and funding, international donors, NGOs and mainstream media and aligned to the EGD. Its narrative is built upon a win-win scenario of biodiversity restoration, forest rewilding, economic growth and social development. Its environmental benefits, particularly in terms of rare species protection and re-insertion, are impossible to overlook. And yet, “accumulation by conservation” exploits structural inequalities to

pursue its benefits (Büscher and Fletcher, 2015). As Büscher and Fletcher (2015, p. 288) point out, more pertinent to “the net costs and benefits of conservation activities” is the need to analyse “how these differentially impact various stakeholders involved in these activities”. Following this perspective, this case study focused on processes of distributional, procedural, and recognitional environmental injustices caused by Carpathia Conservation and the resulting losses and damages for residents. However, it reveals more than a simple discourse of local communities being negatively sacrificed for environmental benefits. What is at stake in the Făgăraş region is the sacrifice of place-based, interdependent, human-nonhuman models of coexistence that “stand in the way of industrial extraction and neoliberal conservation” (Le Billon, 2021) yet potentially represent alternative, more sustainable and fairer, forms of conservation.

The FCC’s ‘environmentalism’ is deeply rooted in a commodified idea of nature-as-value: a ‘pure’ ‘wild’ value-making entity separated from and forcibly protected against human interference. This is evident in ecotourism, and even more so in the project’s recent expansion into carbon credit markets – a development we conceive as a dual commodification of nature. Portrayed as a transformative economic benefit for locals, these processes are underpinned, in practice, by a market-driven strategy reliant on green grabbing. Voluntary carbon credit trading – promoted by the EGD – represents a quintessential expression of this commodification and, as Bogojevic (2024, p. 204) notes, faces “tricky” legal questions, specifically the need to define “which situations allow for reliance on carbon removals (or what makes a socio-economic cost ‘unreasonable’)”. This is a critical concern, as these markets will undoubtedly lead to more entangled relations with extractivist and polluting corporations who are thereby disincentivised from reducing emissions. Indeed, as Le Billon (2021) showed, many conservation organisations offer a spatial and ecological fix for extractivist polluting projects, which need to secure future environmental licenses, in exchange for funding through mechanisms like carbon credits. Instead of complying with carbon emissions targets, industry can pursue carbon offsetting, thereby displacing, not removing harmful emissions whilst promoting new market-based instruments “intended to combine forms of (neoliberal) economic development with environmental conservation” (Büscher and Fletcher, 2020, p. 19). According to Le Billon (2021, 869), this *modus operandi* has progressively less to do with a “green philanthropy” dreaming to rewild places and more to do with a need to produce “future (and new) values out of ‘nature’”.

This rationale makes our argument on conservation-led GSZs even more pertinent. By taking nature “out of an extractivist commercial logic” to “a non-extractive circuit (for ecotourism or contemplation)” (Iordăchescu, 2021, p.196), conservation-led GSZs incentivise processes of nature commodification and green grabbing that produce multiple forms of injustice for local populations, while also altering or even erasing convivial forms of human-nonhuman relations. The participation in the voluntary carbon credit market – a foundation for many major conservation projects – risks further sidelining local communities’ wellbeing and turning their forests into a commodity for distant polluters without delivering local justice.

In the Carpathian Mountains, the formation of a GSZ resulted from the replacement of post-communist “fiefdom forests” and “timber barons” with a modern system of forest

feudalism. This system operates on a "resource sanctuary" model (Iordăchescu, 2025), which uses myths of pure wilderness and a rigid human-nature divide to legitimize strict policies and obscure the historical human presence in the area (see Ugglă, 2010). This approach prioritises protecting nature while overlooking the need to protect people. The resulting tension is clear in the daily lives of Carpathian rural communities, who experience large-scale conservation projects less as opportunities for sustainable development and more as forms of green violence, environmental injustice, and material and intangible losses, all without tangible socio-economic benefits. This pattern of local marginalisation is not isolated. Duckett et al. (2022) demonstrate that rewilding and species reintroduction in four EU countries have negatively impacted small-scale farm production and food security, echoing complaints from the Făgăraş region about tensions related to bear reintroduction. Furthermore, this dynamic reveals a flawed conservation logic, as illustrated in another Romanian case from the Danube Delta discussed by Ioana Savin Bursan (webinar, 2025). There, the role of locals changes dependent on ownership, a process that transforms "historically marginalised population ... from stewards to poachers" and an "impediment for conservation". This dynamic highlights how the role of the human footprint in nature is framed in neoprotectionist visions of conservation, where there is peripheralisation and, in some cases, criminalisation of historical populations and practices.

Ultimately, by revealing the social costs of current models, this study supports recent scholarly calls to adopt 'convivial conservation' as a strategy for rebalancing the relationship between humans and non-humans in the new protectionism of the Anthropocene, by centring the sustainable co-existence of human and non-human nature (Büscher and Fletcher, 2020). Without this shift, the EU's green transition risks being defined by fast-tracked policy loopholes for neo-conservationist, extractivist, and carbon-offsetting schemes—measures that perpetuate the very social inequalities they claim to resolve by sacrificing local well-being and justice for global environmental goals. In crafting large-scale transformative policies like the EGD, risk assessment, public consultation, and precautionary thinking are often sidelined in the name of progress. As Almeida et al. (2023) note, the EGD's transformative ambitions echo historical colonial and neo-colonial patterns. Similarly, Nacu and Jercan (2023) frame the EGD and the SDGs as part of an "environmental economy" shaped by Western, Euro-centric positivism and ambiguous policy rhetoric.

As this study demonstrates, EU conservation policies are not immune to these patterns and must be replaced by alternative paradigms for biodiversity conservation. The convivial conservation proposal (Büscher and Fletcher, 2020; Iordăchescu, 2022) offers one way of reconceptualising large-scale, fortress-style neoprotectionist projects towards decentralised, community-led initiatives that foster human-non-human nature coexistence. It proposes baking-in diversified local economies, agroecology and sustainable traditional practices to policy design, rather than replacing them. Crucially, EU and national forestry and biodiversity policies must recognise and remunerate, the active, skilled labour of communities in maintaining ecosystem. As Velicu (webinar, 2025) underscores, beyond the policy, the idea of conviviality is built on interdependence, democratic and equalitarian principles, rooted in post-extractivist imaginaries of

development to drastically rethink what ecological transformation of our societies would actually imply.

## 7 Recommendations

The case of the FCC in Romania's Făgăraş Mountains emphasises dangers of overreaching the implementation of EGD-related conservation policies. To prevent the creation of further cycle of conservation-led GSZs and to align the green transition with SDG and EGD principles of environmental justice social equity and 'leaving no-one behind', the EU Biodiversity Strategy should explicitly promote **convivial conservation** as a viable model. This approach adapts the proposals of Büscher and Fletcher (2020, p. 186-197) by centering on existing, proven models of grassroots governance and stewardship, such as the Romanian commons (*obști*), as detailed by Iordănescu (2022). The following integrated policy actions are proposed:

1. **Mandated and Meaningful Community Participation:** EU biodiversity and forest policies and associated conservation law must centre co-design processes for conservation projects affecting local communities. This involves formally integrating traditional governance institutions like the *obști*, federations for the rights of forest owners, or other federations that defend the rights of forest owners as essential partners, recognising them **as Other Effective area-based Conservation Measures (OECMs)** to validate their historical and contemporary role in biodiversity stewardship and break from top-down protection models.
2. **Rethinking Conservation Finance and Providing Reparations:** Conservation finance should be reoriented to support communities directly. This includes a) **channeling a Conservation Basic Income (CBI) through commons institutions** to reward their stewardship, building on the positive outcomes of existing CAP direct payments (Buscher and Fletcher, 2020; Guyomard et al., 2023); b) **implementing historic reparations** for the loss of communal lands. Furthermore, the allocation of EU funds (e.g., LIFE programme) must be conditional on integrating rigorous, participatory **Social Impact Assessments (SIAs)** to preemptively evaluate impacts on vulnerable groups and traditional livelihoods and contingent on NGOs meeting the required status (including recognition between non-profits, not-for-profits and for-profit foundations).
3. **Ensure Justice and Equity in Human-Wildlife Coexistence Strategies:** Biodiversity policies must holistically address the socio-ecological consequences of species reintroduction and protection. This requires allocating dedicated EU and national funds for effective, community-supported conflict mitigation measures (e.g., predator-proof fencing) and



ensuring that compensation schemes for damages are accessible, timely and fair, with local communities involved in their design and implementation.

4. **Redirecting Governance and Countering Green-Grabbing:** Support must be redirected to the **polycentric, self-governing models of commons**, leveraging their democratic decision-making for a robust conservation system. Simultaneously, the EU must **establish stricter oversight for large-scale land acquisitions** by creating public registries of conservation deals and supporting independent watchdogs and Citizens Observatories in scrutinising power dynamics and preventing green-grabbing. For example, lessons could be taken and shared with the EC's Directorate-General for Agriculture and Rural Development (DG-AGRI) European Observatory on Agricultural Land.
5. **Fostering Just and Equitable Conservation Coalitions:** Policy must support the creation of Convivial Conservation Coalitions structured around commons, enabling them to redesign local commodity chains.
6. **Commissioning research on dimensions of Environmental Justice and the EU Carbon Credit Market:** Policies that facilitate carbon farming and Payment for Ecosystem Services (PES) must safeguard against green grabbing and operate as an addition to, not a replacement for industrial emission reduction targets. This includes ensuring voluntary carbon credit projects on communal or customary lands cannot proceed without the direct and collective consent of the community. Further research is needed to critically appraise the socioeconomic impacts of value chains of the carbon credit market and establish mechanisms that prevent the consolidation of carbon farming resources by private enterprises. Such research could focus on a new policy roadmap to end the “forest finance gap” launched at COP30 in Brazil in November 2025 that includes, at the top of its list of levers for scaling finance, a need to “Increase demand for high-integrity jurisdictional forest carbon credits” (Williment, 2025).

By implementing these recommendations, policymakers can help ensure that the EU's laudable green ambitions do not exacerbate social inequality and environmental injustice, thereby fostering a truly sustainable and equitable transition that prioritises the conservation (not monetisation) of nature and is dynamic by design to reflect and protect communities that have stewarded it for generation.

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