

Regional Risk Assessment for Estonia (minor update 2021): SBP Response to Consultation

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In the case of inconsistency between translations, the official English language version shall always take precedence.

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1 Introduction

SBP-endorsed Regional Risk Assessments (RRAs) are a key part of SBP's focus on identifying and mitigating risks associated with sustainably sourcing feedstock for biomass pellet and woodchip production. The SBP Framework is designed to provide assurance that feedstock is sourced legally and sustainably.

The purpose of an SBP-endorsed RRA is to evaluate an entire geographic region and determine the risks associated with sourcing feedstock for biomass pellet or woodchip production from that region. Thus, the need for individual Biomass Producers (BPs) to conduct risk assessments is avoided and, therefore, consistency between BPs is improved. The SBP RRA Procedure also ensures active engagement with a diverse range of stakeholders in the region.

In accordance with the SBP Regional Risk Assessment Procedure, SBP-endorsed RRAs remain valid for a period of five (5) years from the approval date. In April 2021, the RRA for Estonia reached the end of its validity. In the light of the ongoing Standards Development Process (<https://sbp-cert.org/standards-development/timeline/>), SBP has decided to conduct a minor update of the RRA for Estonia focusing on several indicators where new data have become available. The Working Body (WB) responsible for conducting the original RRA, Preferred by Nature (formerly NEPCon), was assigned to undertake the update.

Since the validity of the original RRA has expired but the minor update is still in progress, the validity was extended for up to six (6) months in accordance with the SBP RRA Procedure, Clause 7.1.4a) (<https://sbp-cert.org/wp-content/uploads/2021/05/SBP-RRA-Procedure-v1.2-FINAL-31-May-21.pdf>). Therefore, the original RRA remains valid until the minor update has been completed.

SBP requested stakeholder feedback on the proposal to make minor updates to the existing SBP endorsed RRA for Estonia and to extend its validity to coincide with the end of the transition period for the revised SBP Standards (v2.0).

The WB submitted the Final Draft Report to SBP on 5 June 2021. On 17 June 2021, SBP conducted its own 30-day public consultation. This report is SBP's response to that consultation.

The RRA for Estonia (minor update 2021) was formally approved and endorsed by the SBP CEO on 21 October 2021.

2 Regional Risk Assessment Procedure

The SBP Regional Risk Assessment (RRA) Procedure (v1.1) specifies the requirements and processes that must be followed in order to develop and endorse SBP risk assessments of regions or countries.

On 5 June 2021, The Working Body submitted a Final Draft RRA Report for Estonia to SBP. SBP then undertook its own public consultation and internal technical review of the Final Draft RRA Report, the results of which can be found in the following Sections 3 and 4.

3 SBP Public consultation

3.1 Consultation period

On 17 June 2021, the Final Draft RRA Report for the Estonia (minor update) was published on the SBP website for consultation at: <https://sbp-cert.org/sbp-consultation-on-minor-update-and-extension-of-the-validity-of-the-regional-risk-assessment-for-estonia/>. Interested parties were invited to provide written comments on the final draft by Monday, 16 July 2021. Due to summer holidays the consultation period was additional extended for an additional two weeks.

3.2 Comments received

Comments were received from the Estonian Fund for Nature, Graanul Invest, DRAX and Warmeston. All comments received, as well as SBP's response to each, are presented in Section 3.3. below.

3.3 Summary and consideration of comments received

Siim Kuresoo, Forest Program Manager, Estonian Fund for Nature

Stakeholder comment	SBP response
<p>Thank you for the opportunity to comment on the SBP RRA Estonia review findings. As an organisation, we find sustainability in any use of natural resources extremely important in overcoming global challenges of today and therefore we support in principle efforts by industries on their sustainability aspects. However, these efforts should never be used to justify wasteful or unnecessary use of resources and products.</p>	<p>No response necessary</p>
<p>In the case of forest biomass, there are clear signs of stimulus for unnecessary use, voiced by 800 scientists (https://www.pfpi.net/wp-content/uploads/2018/04/UPDATE-800-signatures_Scientist-Letter-on-EU-Forest-Biomass.pdf) and EASAC (https://easac.eu/news/details/easac-reaches-out-to-the-new-european-commission-on-energy-from-forest-biomass/) among others. Using forest biomass to substitute fossil fuels leads to an increase of greenhouse gas emissions in a critical time frame and can distract efforts from energy efficiency critically required for feasible climate mitigation pathways.</p>	<p>Not relevant for the minor update 2021 of the RRA for Estonia.</p> <p>You can read about SBP's purpose at: https://sbp-cert.org/wp-content/uploads/2021/07/SBP_InfoPack_Jul2021_FINAL.pdf as well as Theory of Change here: https://sbp-cert.org/about-us/theory-of-change/</p>

<p>Over the years, we have witnessed situations where meeting certain sustainability standards like SBP are used to dismiss these concerns raised by scientists or NGOs, although the criteria itself does not address issues raised. These occasions discredit the role of certificates as such and decrease civil society's motivation in participating in discussions around sustainability of biomass. Our comments on this occasion are made with a reservation that we do not support use of forest biomass as a form of renewable energy and find it a counterproductive climate solution even if the highest possible sustainability requirements are met in forest management unit level.</p>	<p>Not relevant for the minor update 2021 of the RRA for Estonia.</p> <p>You can read about SBP's purpose at: https://sbp-cert.org/wp-content/uploads/2021/07/SBP_InfoPack_Jul2021_FINAL.pdf as well as Theory of Change here: https://sbp-cert.org/about-us/theory-of-change/</p>
<p>We also condemn the overall approach that SPB shares with other forestry certificates, where historic degradation of ecosystems is seen as inevitability and can therefore justify ongoing practices that are destructive to ecosystems health and ability to provide vital services. This approach turns a blind eye on opportunity costs that are associated with restoration and approaches like proforestation, close to nature forestry and others.</p>	<p>Not relevant for the minor update 2021 of the RRA for Estonia.</p> <p>You can read about SBP's purpose at: https://sbp-cert.org/wp-content/uploads/2021/07/SBP_InfoPack_Jul2021_FINAL.pdf as well as Theory of Change here: https://sbp-cert.org/about-us/theory-of-change/</p>
<p>Concerning minor update and extension of the validity of the Regional Risk Assessment for Estonia all concerns raised above apply. In addition, we witness many occasions where legality is used as an indicator for sustainability. In many aspects this is not the case and should not be used this way. There are also sections where important information is not taken into account. Therefore, we have following comments on specific indicators:</p>	<p>SBP responses to the specific comments are presented below.</p>
<p><i>Indicator 2.1.2 Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed.</i></p> <p>The main effort to determine woodland key habitats in Estonia was made in the beginning of 2000 when woodland key habitats inventory was conducted all over the country. It is estimated that around 42-50% of total woodland key habitats were mapped during that initial inventory (https://keskkonnaamet.ee/media/1198/download).</p> <p>After the inventory up until 2015 only 349,3 hectares (3,4% of the total area) of woodland key</p>	<p>SBP has evaluated the additional evidence and arguments from the Estonian Fund for Nature and has concluded that since the WKH inventory is incomplete it is not possible to justify low risk. Also, as mentioned in the main document, due to changes in legislation it is not possible to justify low risk for potential WKHs since there is no effective way to register new WKHs in private forests. There is a system but the decision of whether to register WKH or not lies with the forest owner, who has a conflict of interest in such cases.</p> <p>NOTE: Since the current SBP Standard 2 accepts FSC and PEFC forest management claims as SBP compliant and since all State Forest is FSC or PEFC-certified then the</p>

habitats were additionally mapped which means that the inventories were basically stalled for around 15 years. Leaving the woodland key habitats not inventoried and thus without protection meant that a large part of them were logged in coming years.

ELF has estimated that during the years 2010-2019, around 5700 hectares of woodland key habitats were felled in the State Forest (https://media.voog.com/0000/0037/1265/files/Raort%20VEP_ELF_16.02.2021.pdf).

Estonian Naturalists Society has been compiling woodland key habitat inventories in the past years in the State Forest. They are selecting forests which to inventory by their age and tree species to find areas that are more likely to be woodland key habitats. Around 36% of the forests that are inventoried meet the criteria of woodland key habitats. This means that there is a higher risk of logging a woodland key habitat that has reached a certain age.

In order to prevent buying timber from unmapped woodland key habitats, additional assessment needs to be carried out in forest stands that have reached a certain age. The forest ages by tree species that are used by Estonian Naturalist Society are as follows:

Tree species	Age
Pine	110
Spruce	90
Birch	90
Oak	90
Ash	80
Aspen	80
Black alder	75
Lime	60
Maple	60
Elm	60
White elm	60

specified risk is valid only for non-certified private forests.

NOTE: The Estonian Fund for Nature provides some recommendations for risk mitigation (e.g., avoiding feedstock from forests with certain characteristics). This information may be used for development of risk mitigation measures.

In conclusion, SBP agrees with the stakeholder's comments and has concluded that for Indicator 2.1.2 the risk of logging in registered and potential woodland key habitats (WKHs) shall be specified.

<p><u>Because the woodland key habitat inventory in Estonian forests has not been completed, we find it is important to avoid timber from forests with these characteristics in sustainable certification systems. Therefore, the forests listed in these categories will have to be addressed as potential woodland key habitats both in State owned and private forests in Estonia.</u></p>	
<p><i>Indicator 2.2.4 Biodiversity is protected (CPET S5b).</i></p> <p>In our view the indicator has been insufficiently assessed. We agree that probably there have not been violations of nature protection regulations, but European Commission has started an infringement procedure against Estonia (https://ec.europa.eu/commission/presscorner/detail/ET/INF_21_2743).</p> <p>It is stated by the European Commission that there are problems with at least 217 protected areas, thus the assessment of only evaluating violation of national nature protection regulations is not sufficient in this risk assessment because the regulations are flawed and do not meet requirements set by European Union. <u>Therefore, timber from the Natura 2000 network should not end up in SPB certified biomass until Estonia and European Commission have settled the issue.</u></p> <p>There are many ways biodiversity protection can be measured. One of the ways is looking at species dwelling in the forest. There is a national assessment on birds that are listed in the EU's Bird Directive.</p> <p><u>In our view, wood sourced from habitats of forest bird species that are in decline should not be considered sustainable. Forest birds that have declining populations in Estonia include capercaillie, hazel grouse, northern goshawk, European nightjar, lesser spotted woodpecker, European crested tit, Eurasian three-toed woodpecker etc.</u></p>	<p>Regarding the European Commission (EC) infringement procedure against Estonia, there are several topics that the EC requires answers to. The Ministry of Environment has said that it does not agree with all the EC's allegations. If there is a case for greater clarity in legislation the Ministry will be responsible for that. (https://envir.ee/uudised/keskkonnaministeerium-soovib-euroopa-komisjoniga-rikkumismenetluses-kokkuleppele-jouda).</p> <p>The details of the communication between the EC and the Ministry of Environment has been declared confidential by the EC.</p> <p>It is not expected that cuttings from all Natura Network protection areas shall be banned. That is not the practice in other EU countries and, therefore, is not expected to be so in Estonia. Estonia has protection areas in the Natura Network that have thousands of landowners managing their lands in limited management zones and it has the Natura Network's purpose to ban all forestry activities in those areas. When creating restrictions, it is common practice that valuable areas are left in strict protection zones and the remainder in limited management zones, where forest management is allowed with certain restrictions.</p> <p>SBP has decided to follow a precautionary approach and to add a new specified risk risk object under Indicator 2.1.2, namely, Natura forest habitat types that are in Natura protection areas limited management zones. Today the Board of Environment is not conducting Natura habitat impact assessments every time before issuing felling permits and felling permits are issued even if the habitat type could be destroyed or damaged. Biomass Producers will need to mitigate the risk of damaging the Natura forest habitat type in a limited management zone.</p> <p>The Working Body also recommends to watch the final conclusions of the communication between the EC and the Estonian government. It</p>

	<p>is expected that in 2022 the RRA for Estonia will undergo the full regular revision and this topic shall be reviewed again.</p> <p>Regarding the protection of bird species – there is effective legislation in place to protect forest bird species, to map new habitats and protect those habitats during the breeding season. In general, the situation in Estonia regarding forest conservation (14% of strictly protected forest and 11.3% of partially protected forests) is fully in line with international nature conservation obligations. There is no academic consensus on why the bird populations may be declining (lack of generally agreed cause-effect relationship between forest management and declining populations). Based on the current situation the Working Body does not see enough justification to change the risk designation from low to specified for this indicator.</p>
<p><i>2.9.1 Feedstock is not sourced from areas that had high carbon stocks in January 2008 and no longer have those high carbon stocks.</i></p> <p>The review defines areas of high carbon stocks as wetlands, peatlands and very old mature forest stands. This is a relevant way to define high carbon stock forests. It then states “... forests which contain the high carbon value mostly have strict protection regime enforced by the legislation”. Unfortunately, no reference or further explanation is given to this statement.</p> <p>Peatlands are defined by soil. In Estonia, any area with a peat soil layer thicker than 30 cm is officially classified as peatland. This is the case for 494,500 ha of Estonian forest falling into swamp forests or drained peatland forest types. As in 2015 only 92,500 ha these were protected. Wetlands as a term include all peatlands as well as other habitats like floodplain forests, so from the wetland perspective the area is even bigger.</p> <p>There is no common definition of very old mature forests, but this should presumably cover natural forests that are covered in national statistical inventory. According to the Environmental Agency, 29 018 ha of these were strictly protected in 2018 out of 46 600 ha in total. To say they are “mostly protected” is stating only the narrow margin of which the protected ones</p>	<p>The SBP Standard does not restrict sourcing feedstock for biomass production from wetlands or peatlands.</p> <p>In a guidance note to Indicator 2.9.1 it is explained that drainage shall not be conducted on previously undrained soils (renovation of old Soviet-time drainage systems using modern engineering methods is acceptable) and this is being followed in practice.</p> <p>The same guidance note further explains that wetlands should remain as wetlands and peatlands should remain as peatlands. This is also followed for all management activities in these areas.</p> <p>It is true that harvesting activities in peatland and wetland forest may release some soil carbon, but the Standard does not currently prohibit forest management in these forests. Also, the released carbon may be absorbed by increased tree growth along the drainage project.</p> <p>There is no common definition for old-growth forest in Estonia. It is also not covered by Indicator 2.9.1 itself. Such forest should be covered by the existing network of protected areas and woodland key habitats (WKH). However, due to the deficiencies in the WKH inventory, there is a risk that unmapped potential WKHs may be logged. This risk is addressed under Indicator 2.1.2. above and classified as specified risk.</p>

<p>outnumber the not protected ones. Regardless of the differences in approach, woodland key habitat mechanisms are effective to protect natural forests. Therefore, all comments above apply here.</p> <p>We believe that, in order to exclude wood from areas that have or had high carbon stock, all timber logged in peatlands and areas that meet woodland key habitat criteria should be excluded. Other forest types with existing peat layer thinner than 30 cm are subject to long lasting soil carbon loss in extensive forest management and should also be considered when making a judgement on sustainability from the soil carbon aspect.</p>	<p>In conclusion, SBP has decided that Indicator 2.9.1 in its current wording shall be classified as low risk.</p> <p>NOTE: The SBP Standards are undergoing a revision and a revised version of Standard 1 is expected at the end of 2021. The regular, full revision of the RRA for Estonia will follow shortly after. Special attention will be given to the topic of forest carbon and the situation reviewed again then.</p>
<p><i>2.9.2 Analysis demonstrates that feedstock harvesting does not diminish the capability of the forest to act as an effective sink or store of carbon over the long term.</i></p> <p>We strongly disagree with conclusions that any decrease in sink, forest carbon stock or overall LULUCF figures are primarily due to age structure of forest or even increased emissions from croplands to cover growing food demand. Wood extraction is the single most important factor in the overall total in all of the figures mentioned and the referred “Forest and Climate Change” presents series clear qualified scenarios for different logging rates that clearly demonstrate the effect on sink and stock. Its conclusions on optimal rate are not solely based on optimal carbon management, but also taking into account socio-economic considerations, that are not relevant under the indicator discussed here.</p> <p>It is a matter of discussion what “long term” means, but the modeling data presented in the “Forest and Climate Change” clearly says that the suggested optimal logging will result in lesser sink in the next 50 years that are critical in climate perspective and somewhat predictable. The figures it presents about the effect on the stock are heavily conflicting with Environmental Agency earlier calculations, including the ones presented in National Forestry Accounting Plan 2021-2025.</p>	<p>Due to a lack of agreed academic consensus regarding the definition of “long term”, we use an average forest rotation period for main species (i.e., >70 years). The Indicator does not require avoiding any decline (on any timeframe) in forest carbon stock or sink.</p> <p>The “Forest and Climate Change” report (see the list of references in the main RRA document) says: If the forest is felled under a “mature felling scenario”, carbon associated with the forest could generate emissions that would also lead to Estonian land use, land use change and forestry sector (LULUCF) becoming an emitter in the coming decades. Still, around 2040 the forest carbon sequestration and emissions would become neutral and from 2050 onwards more carbon would be sequestered under the “mature felling scenario” than under the “uniform felling scenario”. Nevertheless, a “mature felling scenario” (when forest stands are harvested right after maturing) has never been practised and is not expected to be in the future.</p> <p>The 2020 National Inventory Report (NIR) report says that carbon stock and sink capabilities may decline during the next 20 years but will increase again from 2041 onwards. This is in line with the indicator that refers to “long term”.</p> <p>In August 2021, a new report was published – LULUCF sector carbon sink analysis till 2050 (Maakasutuse, maakasutuse muutuse ja metsanduse sektori sidumisvõimekuse analüüs kuni aastani 2050) (https://envir.ee/-/media/4036/download).</p> <p>The report provides additional assurance that if current forest harvest levels are maintained</p>

<p>It is also important to note that national statistics have shown a notable decrease in 2020 in growing stock that further confirms the effect current logging volumes have on forest carbon stock.</p>	<p>(highly likely) then there is no risk to forest carbon stock and sink in the future.</p> <p>In conclusion, SBP has decided that Indicator 2.9.2 in its current wording shall be classified as low risk.</p> <p>The SBP Standards are undergoing a revision and a revised version of Standard 1 is expected at the end of 2021. Regular, full revision of the RRA for Estonia will follow shortly after. Special attention will be given to the topic of forest carbon and the situation reviewed again then.</p>
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Viljo Aros, Quality and Environmental Manager, Warmeston OÜ

Stakeholder comment	SBP response
<p>We welcome the approach of the minor revision and thank you for the chance to comment the RRA for Estonia.</p>	<p>No response necessary</p>
<p>We like to point out that the FSC's CNRA for Estonia was approved in September 2017. The specified risks in the CNRA were highly debated and not consensus based. Considering one of the objectives of the revision is to update findings for indicators where new information has become available, it is our understanding that the "specified risks" from the FSC CNRA should not just be copied to the RRA, but should be reassessed based on the most recent data including:</p> <ul style="list-style-type: none"> • New inventories and changes in WKH area; • Changes in the Heritage Conservation Act (latest revision in force since 01.01.2021) and new protected areas including for cross trees. 	<p>It is correct that the FSC CNRA was approved in 2017 and thus there could be scope for it being updated. Its content has been used as valuable input, but each risk was evaluated on the basis of the most recent information, including other more recent publications and information sources.</p> <p>New WKH inventories and changes in WKH area were considered during the risk evaluation.</p> <p>Also, changes in the Heritage Conservation Act (latest revision in force since 1 January 2021) and new protected areas that will be created for cross trees were considered during the risk evaluation. The Working Body also contacted The Heritage Board for explanations regarding the situation with natural sacred grounds and cross trees.</p> <p>For the summary regarding specified risks under Indicator 2.1.2 please see above and in the main RRA document.</p>

Stuart Harker, Sustainable Sourcing Manager, Drax Power Station

Stakeholder comment	SBP response
<p><i>Indicator 2.1.2 Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed.</i></p>	<p>Specified risk is identified for potential or unmapped woodland key habitats. The WKH inventory is not complete and there is a risk that some unidentified WKHs could be damaged. Also, as mentioned in the main RRA document, due to the changes in legislation it is not possible to justify low risk for potential WKHs since there</p>

<p>a. The risk explanation should mention that the risk is only 'specified' in relation to private forests that have not signed the WKH contract and where the WKH has been identified after the 2017 legal act effective date.</p>	<p>is no effective way to register new WKHs in private forests. There is a system but the decision whether to register WKH or not lies with the forest owner, who has a conflict of interest in such case.</p> <p>There was indeed a positive dynamic in recent years with mapping new WKHs in state forest, however, it is not possible to conclude that the risk is low due to the incomplete inventory in private forests.</p>
<p><i>Indicator 2.1.2 Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed.</i></p> <p>b. The area of WKH has increased by approximately 1/3 over the last decade. This should be included in the explanation.</p>	<p>There was a positive dynamic in recent years with mapping new WKHs, however, it is not possible to conclude that the risk is low due to the incomplete inventory in private forests.</p>
<p><i>Indicator 2.1.2 Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed.</i></p> <p>c. Natura habitats in areas of limited management zones - regarding the text 'State regulations do not protect the Natura 2000 forest habitat types in limited management zones and cutting of the habitat types in limited management zones depending on the cutting type either has negative effect to the habitat type or destroys the habitat type.' Our understanding is that this is incorrect as harvesting in limited management zones is only allowed if the impact to the forest is either positive or neutral.</p>	<p>In state forest, RMK, State Forest Management Centre, do not cut registered Natura habitats. In private forests in Natura areas limited management zones and also in sub-compartments with Natura forest habitats, the Board of Environment will issue felling permits, This has been common practice. The purpose of limited management zones is not to protect Natura forest habitats since in most of the cases any kind of felling work will have negative effect in most of habitat types.</p> <p>There is no separate impact assessment carried out because of presence of forest habitat types in limited management zones before issuing a felling permit. In order to protect such forest habitat types these would need to be left out from forest management. There are few habitat types where certain forest management would not damage the values.</p> <p>SBP has decided to add a new specified risk object, namely, Natura forest habitat types that are in Natura protection areas limited management zones, under this indicator.</p>
<p><i>Indicator 2.1.2 Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed.</i></p> <p>d. Natural sacred grounds – following the 2019 Heritage Conservation Act update and</p>	<p>The New Heritage Conservation Act now has "natural sacred grounds" as separate protection objects. The purpose of this act is to prevent damaging these objects.</p> <p>According to the Heritage Board the inventories by state are done in approximately half of Estonia (https://www.muinsuskaitseamet.ee/et/ajaloolised-ja-looduslikud-puhapaigad) and the data about</p>

<p>subsequent inventory, could you confirm there remains a risk post-2019?</p>	<p>sites that have been inventoried has not been added to the database in full. Also, the process of giving official state protection status for the sites that have been inventoried has not been finished. This is still work in process. For some sites the official protection status will not be given at all.</p> <p>Regarding cross trees, these are not mentioned in the Heritage Conservation Act and are not officially under protection. The Heritage Board has started the process of taking cross trees under protection. They will start with the state forest (where the cross trees are protected anyway by RMK) and will continue with private forests https://www.muinsuskaitseamet.ee/et/uudised/uuenenud-ristipuude-kaart-ootab-vabatahtlike-taiendus).</p> <p>The current situation is that the landowner will receive information about cross trees together with the felling permit, but the protection of those trees is voluntary.</p> <p>Taking into account the above, SBP has decided to classify the risk as specified.</p>
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Mihkel Jugaste, Head of Quality and Certification, Graanul Invest AS

Stakeholder comment	SBP response
<p>Please accept that this minor update has major implications on Estonian forestry and bioenergy supply chains.</p> <p>The HCVs under 2.1.2 have been heavily debated by the NGOs but have never received a fair and balanced assessment. It is strongly expected by certificate holders and relevant stakeholders that this update will not blindly follow FSC CW and will do more in evaluating details, today's conditions, and context.</p> <p>Also, the situation in different counties and regions with the below HCVs is hugely different. The risk designation cannot ignore this and needs to assess the risk in each county. The extent of recent inventories is a good starting point for highlighting the counties with the alleged specified risks.</p>	<p>SBP fully understands the potential impact of an updated RRA for Estonia. In case of a lack of consensus, SBP has followed a precautionary approach (specified risk). A Biomass Producer may still develop and implement specific measures to mitigate the risk.</p> <p>The update did not blindly follow FSC CW but used FSC CW as one of a number of sources of information.</p> <p>It is true that FSC and PEFC FM claims are considered SBP-compliant under the current SBP Standards. The RRA document has been revised to address this observation.</p>

<p>Furthermore, this risk assessment is valid during the period where FSC and PEFC FM claims are SBP compliant. Why has/does the RRA include references to FSC and PEFC forest management standards? Isn't this irrelevant and confusing?</p>	
<p><i>Indicator 2.1.2 Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed.</i></p> <p>Potential WKHs</p> <p>1. The explanation should mention that the WKH situation in Estonia has been constantly improving and will continue to do so.</p> <p>WKH area has increased 33% in the last 10 years and the action plans for this conservation area type are progressing well. All wood and forest industry participants are monitoring this risk area and keeping this risk low with continuously improving procedures and data systems. WKH area 2010 - 23 181 ha; WKH area 2020 was 30 843 ha.</p> <p>https://www.keskkonnaagentuur.ee/failid/aastaraamat_2010a_parandatud.pdf (page 150)</p> <p>https://www.keskkonnaagentuur.ee/sites/default/files/09_keskkond_0.pdf (page 14)</p> <p>2. The risk explanation should mention that the specified risk is only with private forests who have not signed the WKH contract and where the WKH has been discovered after the 2017 legal act effective date. We know there is no public information that can be used to check this, but this is the risk definition not the mitigation measure. The risk itself is only with the private forests that meet this specification, and the definition should be clear about that.</p>	<p>We agree to change the wording of risk description that the specified risk is related to registered WKHs where private forest owners does not have valid protection contract with the state. On the other hand in cases where there is contract with the state there is no forest management allowed anyway and there is no material coming from such areas.</p> <p>It is important to mention that the WKH area has been mainly increasing in state forest land due to the inventories conducted there.</p> <p>Since the registration process of registering new WKHs is dependent on the forest owner, low risk cannot be designated for potential WKHs.</p>
<p><i>Indicator 2.1.2 Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed.</i></p> <p>Natura forest habitat types that are in Natura protection areas limited management zones</p> <p>1. We strongly protest the following language <u>State regulations do not protect the</u></p>	<p>Common practice by the Board of Environment is for felling permits to be issued in limited management zones and also in areas of Natura 2000 habitats.</p> <p>After consulting with the Working Body, SBP does not agree with the first comment – the Board of Environment does not conduct Natura habitat impact assessments before issuing felling permits and felling permits are issued even if the habitat type will be damaged or destroyed. Today this is common practice. Thus the risk to Natura</p>

<p><u>Natura 2000 forest habitat types in limited management zones and cutting of the habitat types in limited management zones depending on the cutting type either has negative effect to the habitat type or destroys the habitat type.</u></p> <p>This is very wrong and limited management zone harvests are only allowed if the impact to the forest habitat is positive or neutral-positive. Every limited management zone harvest permit is issued through a EIA equivalent process.</p> <p>The Environmental ministries explanations seem to be missing from here https://www.envir.ee/en/news-goals-activities/forestry/protection-forests-and-natura-2000-areas</p> <p><u>The risk is only “specified” for limited management zone harvests with NATURA 2000 forest habitat overlaps which harvest permits do not include the specific forest habitat related restrictions. This is vital to include in the explanation of the risk.</u></p> <p>2. It is also important to address conflicts where the limited management zone protection goal requires maintenance of the semi-natural habitat but the NATURA 2000 forest habitat forbids it on the same area. The harvest is legal and sustainable, but SBP system will not accept it?</p> <p>3. The situation in different countries or regions is important to consider.</p>	<p>forest habitat types in Natura protection areas limited management zones shall be specified.</p> <p>This risk shall be reviewed during the process of updating the RRA in the light of the revised SBP Standards.</p> <p>Regarding the second comment – this is mainly related to wooded meadows habitat type, and in such cases management activities proposed by the Board of Environment are needed. Material from such areas is accepted by the SBP certification system as well. This will be mentioned in the main RRA document.</p>
<p><i>Indicator 2.1.2 Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed.</i></p> <p>Natural Sacred grounds</p> <p>1. The situation in different countries or regions is vital to consider.</p> <p>2. The 2019 Heritage Conservation Act update increased the protection status of the natural sacred grounds and active inventory has been done ever since. How is it clear that there is still a risk after 2019 harvests?</p>	<p>The New Heritage Conservation Act now has “natural sacred grounds” as separate protection objects. The purpose of this act is to prevent damaging these objects.</p> <p>According to the Heritage Board the inventories by state are done in approximately half of Estonia https://www.muinsuskaitseamet.ee/et/ajaloolised-ja-looduslikud-puhapaigad) and the data about sites that have been inventoried has not been added to the database in full . Also, the process of giving official state protection status for the sites that have been inventoried has not been finished. This is work in process. For some sites the official protection status will not be given at all.</p> <p>Regarding cross trees, these are not mentioned in the Heritage Conservation Act and are not officially under protection. The Heritage Board has started the process of taking cross trees under protection. They will start with the state</p>

	<p>forest (where the cross trees are protected anyway by RMK) and will continue with private forests https://www.muinsuskaitseamet.ee/et/uudised/uuenenud-ristipuude-kaart-ootab-vabatahtlike-taiendusi).</p> <p>The current situation is that the landowner will receive the information about cross trees together with the felling permit, but the protection of those trees is voluntary.</p> <p>Taking into account the above, SBP has decided to classify the risk as specified.</p>
<p><i>Indicator 2.1.2 Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed.</i></p> <p>Cross trees</p> <ol style="list-style-type: none"> Heritage board recently added 15 cross tree forests under protection. Is there still a risk after this? Is it evaluated? The identified cross trees are protected in central databases and harvest permits include notices about them. The situation in different countries or regions is vital to consider. 	<p>Based on the public information available protecting cross trees is still work in process. The Heritage Board started with state forest (that is FSC certified) and will continue with private forests.</p> <p>Maintaining cross trees in private forests depends on the will of landowner.</p> <p>The chance that anyone cuts cross trees intentionally is low but until it is legal to cut them, low risk cannot be justified.</p>

4 SBP Internal Review

Following the close of the public consultation period, SBP performed an internal technical review of Final Draft RRA Report for Estonia against the procedural requirements. Comments arising from that review were directed back to the Working Body. The Working Body provided a complete response to each of the issues raised and revised the Final Draft RRA Report to include additional clarifications and/or explanations as necessary. The revised Final Draft RRA Report was submitted to SBP on 28 September 2021.

5 Review by the Independent Technical Committee

On xx October 2021, the Final Draft RRA Report was submitted to the SBP Technical Committee for the final independent technical review. The Technical Committee reviewed the report to ensure that the overall process and report quality met SBP's requirements and recommended approval on 21 October 2021.

6 Approval and endorsement of Regional Risk Assessment

The RRA for Estonia (minor update 2021) was formally approved by the SBP CEO on 21 October 2021 and the SBP-endorsed RRA published alongside this document on 22 October 2021.

The full, regular revision of the RRA for Estonia is planned in 2022 once the revised SBP Standards have been published.