



Standards Document

SBP-endorsed Regional Risk Assessment for Estonia

Minor update and extension of validity

Sustainable Biomass Program
sbp-cert.org



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This document replaces SBP documents:

- SBP-endorsed Regional Risk Assessment for Estonia (version 1.0 published on 22 April 2016)

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SBP contact information. T: +371 292 033 88; E: info@sbp-cert.org

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

SBP welcomes comments and suggestions for changes, revisions and/or clarifications on all of its Standards documentation. Please contact: info@sbp-cert.org

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Abbreviations

- FSC NRAF – FSC National Risk Assessments Frameworks
CWTC – FSC Controlled Wood Technical Committee
FSC – Forest Stewardship Council
PEFC – Programme for the Endorsement of Forest Certification
SBP – Sustainable Biomass Program
SBE – Supply Base Evaluation
WHK – Woodland Key Habitat
FMU – Forest Management Unit
VAT – Value Add Tax
HCV – High Conservation Value
FAO – Food and Agriculture Organisation
NGO – Non-governmental Organisation
FM – Forest management
EAKL – The Estonian Trade Union Confederation
ILO – International Labour Organisation
EELIS – Estonian Nature Information System
GMO – Genetically Modified Organism

Foreword

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 wood chip production. The SBP Framework is designed to provide assurance that feedstock is sourced legally and sustainably.

Feedstock certified at the forest level through FSC® or PEFC schemes and feedstock from recycled sources is considered SBP-compliant. All other feedstock must be evaluated using a risk-based approach if it is to count towards an SBP-compliant claim.

Typically, the Biomass Producer – a pellet mill or wood chip producer – is responsible for carrying out the risk assessment and putting in place mitigation measures to manage any specified risks such that the risks can be considered to be controlled and hence low risk. It is the role of an independent, third-party Certification Body, approved by SBP, to check that the feedstock evaluation has been correctly undertaken and that any mitigation measures are being effectively implemented.

The purpose of an 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 to conduct risk assessments is avoided and, therefore, consistency between Biomass Producers' risk assessments guaranteed. The SBP RRA Procedure also ensures active engagement with a diverse range of stakeholders in the region.

The SBP RRA Procedure specifies the requirements and processes that must be followed in order to develop and endorse SBP risk assessments of regions or countries.

Initial RRA for Estonia

The objective of the development of initial RRA for Estonia was to conduct a risk assessment according to the Sustainable Biomass Partnership (SBP) standard (Standard 1: Sustainable Feedstock Standard, v1.0, 26 March 2015) in Estonia. Since there was quite large overlap between FSC Controlled Wood risk assessment criteria and SBP criteria, this SBP risk assessment relied largely on the field test of the FSC guidelines, which was carried out by NEPCon in 2014 focusing on the establishment of National Risk Assessments Frameworks (NRAF) that were produced by the FSC Controlled Wood Technical Committee (CWTC). The focus of the assessment was on the additional criteria included in the SBP standard, which was not covered by the draft FSC NRAF. However, relevant findings and results of the NRAF field test have been part of this project.

Staff from NEPCon Estonia, with a strong background in FSC certification and certification in general, prepared initial SBP Regional Risk Assessment (RRA). Furthermore, it was supplemented by NEPCon international staff with experience in sustainable biomass certification.

The initial SBP RRA was based on a number of different sources of information, including applicable legislation, reports from state authorities and other stakeholders, various databases and statistical data sources. This information was requested from state authorities such as the Environmental Inspectorate, the Estonian Tax and Customs Board, the Work Inspectorate, the Police etc. During the preparation of the initial RRA, developers made a detailed baseline study for each of the SBP principles and criteria. During the first consultation period (26 March 2015 to 26 April 2015) NEPCon received comments and additional information from several stakeholders and from state institutions. Based on this information some of the specified risk designations were changed to low risk. The second stakeholder consultation period was from 05 May 2015 to 20 May 2015. During this consultation, some additional comments were raised. A detailed description of the situation for each criterion was presented in Annex 1 along with the chosen level of risk, which was based on the information provided. Summarised risk assessment conclusions were provided in the Conclusions section (chapter 5 of this document).

Minor update 2021

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 may be 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 extend its validity to coincide with the end of the transition period for the revised SBP Standards (v2.0). SBP received no objections to this proposal.

Justification for the minor update

The Standards Development Process currently underway is reviewing each of the Standards. As part of the Process, it is anticipated that the revised Standards will be published by the end of 2021. Standard 1 is the foundation of the SBP RRAs and any revisions to that Standard will trigger the need to update all existing SBP-endorsed RRAs.

Once the revised Standards are published there will be a transition period allowing time for Certificate Holders to comply with the revised requirements. From the end of that transition period it will be mandatory for all Certificate Holders to comply with the revised requirements. Existing SBP-endorsed RRAs will require updating in line with the revised Standards and that will be undertaken in a timely fashion within the same transition period, such that complying with the requirements of the updated RRAs will also be mandatory from the end of the transition period.

For that reason, SBP decided to conduct a minor update (partial regular revision), focusing only on the key criteria where it was possible that risk designations may have changed or new information has become available, and then to extend the RRA's validity to coincide with the end of the transition period for the revised SBP Standards (v2.0). The decision is in accordance with the *SBP Regional Risk Assessment Procedure, Section 8 Exception to RRA Procedure* (<https://sbp-cert.org/wp-content/uploads/2021/05/SBP-RRA-Procedure-v1.2-FINAL-31-May-21.pdf>). SBP consulted the Technical Committee and received a positive recommendation with regard to the proposal, following which the SBP CEO approved the exception. Public stakeholder consultation also did not object the decision.

This update to the RRA for Estonia focuses on several indicators where new data has become available. SBP requested Preferred by Nature (formerly NEPCon), the Working Body responsible for developing the initial and current RRA for Estonia, to conduct a desk-based review and minor update of the RRA.

Since the publication in April 2016 of the initial RRA for Estonia, the FSC Centralised National Risk Assessment (CNRA) has been published, which identifies several additional specified risks factors (e.g. potential WKHs) within Indicator 2.1.2 compared to the initial SBP-endorsed RRA. One of the objectives of this update was to study the FSC CNRA and amend the SBP-endorsed RRA if necessary. This was done through a desk-based comparison of the two documents.

In addition, stakeholders have shared some comments in media about the sustainability of forest management in Estonia, in particular, regional forest carbon stocks. Since the latter is covered in SBP Standard 1 under criterion 2.9, it was important to review indicators 2.9.1 and 2.9.2 of the SBP-endorsed RRA and determine if the risk designations were still accurate.

Therefore, the objectives of this minor update were as follows:

- To review the existing SBP-endorsed RRA by considering the risk factors identified in FSC CNRA;
- To revise the existing SBP-endorsed RRA to update findings for indicators where new information has become available;
- To address recent stakeholder comments regarding regional forest carbon stocks; and
- To avoid extensive revision ahead of the revised Standards, which are expected to be published at the end of 2021.

The next full review of the RRA will be undertaken against the revised Standards. It is expected to start in early 2022.

Summary of minor updates

In summary, it is proposed that all the risk designations on an indicator level remain as they are in the valid (2016) SBP-endorsed RRA, with Indicator 2.1.2 the only indicator rated as specified risk. However, additional information has been provided in the 'Findings' section of each of the following indicators:

Indicator 2.1.2

Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed.

After evaluating recent publicly available information the WB identified the following additional specified risk factors under Indicator 2.1.2:

- Potential Woodland Key Habitats (WKHs);
- Natura forest habitat types that are in Natura 2000 protection areas limited management zones;
- Natural Sacred grounds; and
- Cross trees.

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 specified risks above are valid only for non-certified private forests (i.e., a Supply Base Evaluation is not required for the feedstock sourced with the SBP-approved Forest Management Scheme claim).

Indicator 2.2.2

Feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).

In February 2021, the WB made a request for more recent statistics regarding soil damage related violations to the Environmental Inspectorate. It was confirmed that the number of soil damage related violations during the last five years continued to be insignificant. The risk designation remains as low.

Indicator 2.2.3

Key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).

In February 2021, the WB made a request to the Environmental Inspectorate for more recent data regarding violations of nature protection regulations. It was confirmed that there were no major violations of nature protection areas documented during the past five years.

All the important key ecosystems are afforded protection under a protection regime or classified as a WKH. There is a functioning system of registering new protected species and habitats. Risks related to WKHs and potential WKHs are described under 2.1.2 above.

Indicator 2.2.4

Biodiversity is protected (CPET S5b).

In February 2021, the WB made a request to the Environmental Inspectorate for more recent data on the topic of violations of nature protection regulations. It was confirmed that there has been no change during the last five years.

There is an effective legislation in place to protect species, to map new habitats and protect those habitats. 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 and often exceeds the practices in neighbouring countries. 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 WB does not see enough justification to change the risk designation from low to specified for this indicator.

SBP decided to follow a precautionary approach and to add a new specified risk object under Indicator 2.1.2 above - 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 each time before issuing felling permits and the felling permits get 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.

Indicator 2.3.1

Analysis shows that feedstock harvesting does not exceed the long-term production capacity of the forest, avoids significant negative impacts on forest productivity and ensures long-term economic viability. Harvest levels are justified by inventory and growth data.

Analysis shows that feedstock harvesting does not exceed the long-term production capacity of the forest; avoids significant negative impacts on forest productivity; and ensures long-term economic viability.

Evidence of harvest levels are provided as inventory and growth data in Yearbook Forest and Environmental Ministry website. The *Forestry Development Plan for 2021-2030* has not yet been agreed. However, based on information provided by consulted experts of the University of Life Sciences, it is anticipated that felling rates will not be higher than in last *Forestry Development Plan*. Annual felling rates and annual growth comparisons are given in the *Yearbook Forest 2018* and on the Environmental Ministry webpage <https://www.envir.ee/et/metsastatistika>.

The *Yearbook Forest 2019* gives statistical information, including growth:drain, inventory, mortality and age class distribution according to ownership type, administrative boundaries and other criteria, about felling activity by type from 1993 for state-owned and private forest.

A review of the statistics confirmed that annual harvest levels stay below annual yield and thus the low risk designation may be maintained. The risk designation remains as low.

Indicator 2.8.1

Appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).

According to latest statistics from the Labour Inspectorate (<https://www.ti.ee/et/statistika/tooonnetused>) there were 30 accidents in 2017 (12 of which were rated serious¹), 29 (of which 13 were rated as serious) in 2018, 27 (of which 6 were rated as serious) in 2019 and 27 in 2020 (of which 9 were rated as serious). Based on the latest statistics it is proposed that there is no need to change the risk designation for this indicator.

¹ Serious occupational accidents include open fractures, extensive wounds and the amputation of fingers, toes and limbs (but not fatalities).

Indicator 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.

Analysis of reviewed sources (valid legal acts, EELIS database, recent updates on protection and restoration of wetlands and peat lands) conducted by the WB confirmed that there is no risk to high carbon stock areas, such as wetlands and peatlands in Estonia.

The SBP Standard does not restrict sourcing feedstock for biomass production from wetlands or peatlands.

In a guidance note to the 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. No previously undrained soils are being drained.

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.

It may be true that harvesting activities and drainage restoration 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.

SBP has decided that Indicator 2.9.1 in its current wording shall remain classified as low risk.

NOTE: The SBP Standards are undergoing a revision and a revised version of Standard 1 is expected at the end of 2021. It is possible that SBP requirements for forest carbon will change. 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.

Indicator 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.

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. Due to a lack of agreed academic consensus regarding the definition of “long term”, the WB 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. The WB has reviewed the following reports:

- *Forest and Climate Change*, (2020) published in cooperation between Estonian Ministry of the Environment and University of Cambridge;
- The two most recent NIR reports, Report pursuant to Articles 13 and 14 of Regulation (EU) 525/2013 Estonia (2019) and Report pursuant to Article 39 of Regulation (EU) 2018/1999 Estonia (2020), both published by Ministry of the Environment.
- LULUCF sector carbon sink analysis till 2050 (Maakasutuse, maakasutuse muutuse ja metsanduse sektori sidumisvõimekuse analüüs kuni aastani 2050), (2021) published in cooperation with Environmental Agency and Estonian University of Life Sciences.

The analysis shows that the LULUCF sector, in general, is expected to become a source of greenhouse gas emissions from 2031 onwards. The LULUCF sector includes several land use classes, including forest land, cropland, grassland, wetlands, settlements and other land. Forest land and Harvested Wood Products (HWP) will continue to sequester carbon, however, in the other categories (cropland, grassland, wetlands and settlements), emissions will occur throughout the period up to 2050 and, therefore, emissions are expected to increase from cropland, grassland, wetlands and settlements. In the case of

croplands, emissions originate mainly from cultivation of organic soils, and to a lesser degree from land conversion to croplands. For wetlands, emissions are off-site and associated with the production and use of horticultural peat. Under the settlements and other land categories, only emissions arising from land conversions have been reported. It was assumed that land conversions will continue to occur at the same rate as the average over 2015–2019. Higher emissions from the settlements category in the period 2023–2025 are as a result of deforestation due to the construction of Rail Baltic.

The age structure of managed forests in Estonia is dominated by mature stands, as approximately 39% of forest stands are more than 60 years old. Due to the high proportion of mature forests, management may be necessary to increase the forest carbon sequestration capacity. Although carbon sequestration will temporarily decrease over the coming years, it will increase in the long run.

The WB also reviewed the report, *Hidden inside a wood pellet*, (2020) published by the Estonian Fund for Nature and the Latvian Ornithological Society. The report raised some concerns about a potential decrease in the forest carbon sink projected in the National Inventory Report (NIR) from 2019. However, the more recent 2020 NIR report states that although carbon sequestration will temporarily decrease in the coming years, it will increase in the long run. Further, the *Hidden inside a wood pellet* (2020) report identifies the whole LULUCF sector as an indicator of future net emissions, while forestry and HWP classes were expected to continue to sequester carbon and that net emissions were expected from other land classes.

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>). The report provides additional assurance that if current forest harvest levels are maintained then there is no risk to forest carbon stock and sink in the future.

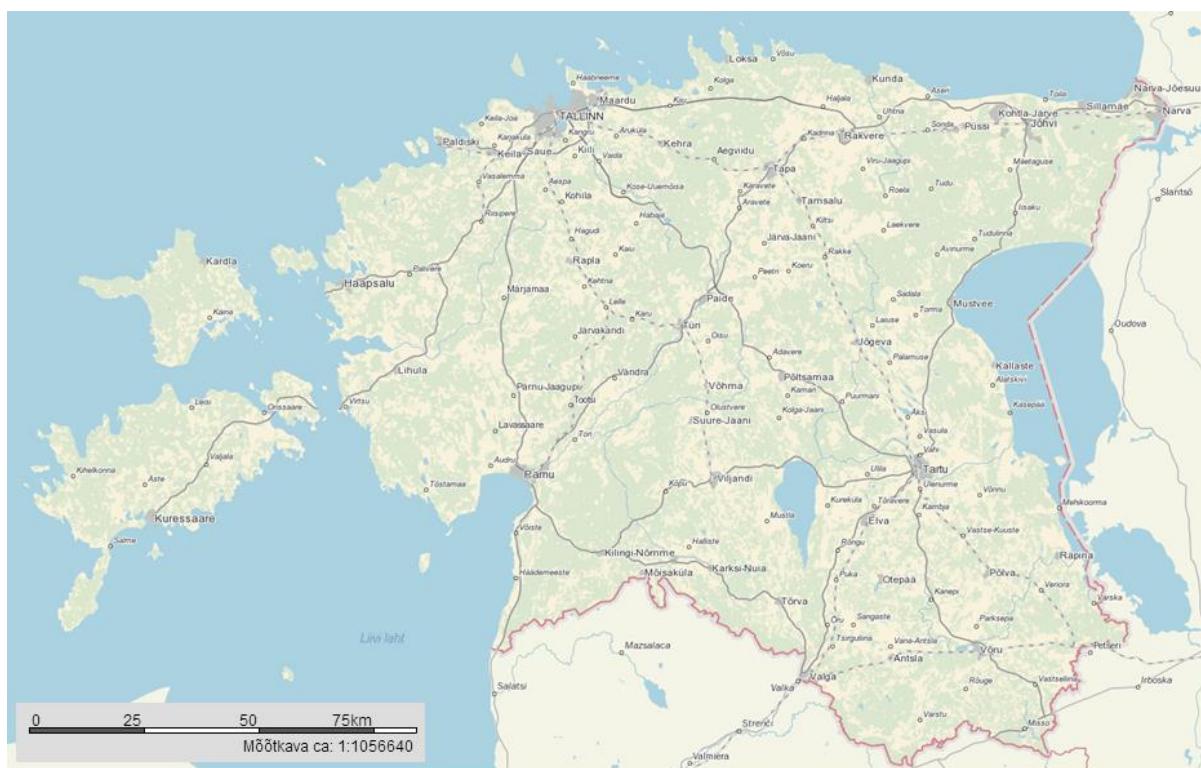
In conclusion, SBP has decided that Indicator 2.9.2 in its current wording shall remain classified as low risk.

It is recommended to review this indicator during the full revision after the publication of the revised SBP Standards in 2022. It is worth mentioning that the forest carbon stock and sinks is a very difficult academic topic and a discussion is far from being settled.

1 Scope and regional background

The scope of this risk assessment is restricted to within Estonia's national border. The scope of this assessment covers all forests of Estonia (see the map below). The forest is defined in the Forest Act. Three main forest categories are described in this legislation: commercial forest, protection forest and protected forests. According to the ownership, forests are also divided into private forests, municipality forests and state-owned forests. State owned forests are managed by the State Forest Management Centre. Because the state-owned forest in Estonia is FSC and PEFC certified the level of risk for these forests compared to the private forest is considered lower. The situation in private, municipality and state forests are more or less similar because most of the forest management activities within all three categories are managed by private companies. In state forest, the control over different activities is generally better than in private forests on average and in case of any violations the corrective actions are taken faster. For logging, it is a requirement that a valid forest inventory or forest management plan, along with a felling permit issued by the Environmental Board, is available. The Forest Act does not apply for separate forest areas smaller than 0,5 hectare. It is allowed to cut up to 20 cubic metres of timber per forest management unit (FMU) without a felling permit. All issued felling permits and forest inventory data is available in the public forest registry online database.

The country is considered homogenous with regard to SBP risks, just like other forestry and forestry related risks therefore no further sub-division is needed. Where differences in regards to forest ownership are identified it is explicitly mentioned under the finding of each indicator.



Map of Estonia. Source: Maa-amet

2 Methodology

Initial Regional Risk Assessment 2016

NEPCon has estimated a significant overlap (approximately 50%) between the FSC NRAF requirements and the requirements in the SBP Sustainable Feedstock Standard. Considering this fact, this SBP risk assessment partly relies on and uses a lot of information from an earlier risk assessment carried out in Estonia for FSC in 2014. The full SBP risk assessment includes all relevant criteria and indicators of the SBP Sustainable Feedstock standard. The analysis was completed by the same team who was involved in the FSC risk assessment, thus capitalising on work already done and previous experience gained by the team.

The indicators and criteria related to the forest management practices and environmental protection measures were analysed, taking only the primary feedstock producers in Estonia into account as they have a direct impact on these criteria. The primary feedstock suppliers in Estonia are state forest enterprises, separate private forest owners and cooperative societies unifying a certain number of private forest owners. However, the standard requires a consideration of all possible inputs from the supply base. Therefore other actors, including sawmills and timber industry entities importing, producing or/and exporting the biomass products not directly related to the forest management practice were taken into account as well.

The main biomass material provided for the market, can be divided into two groups: pellets and chips. Both can be produced from material delivered by primary wood suppliers from Estonia such as state forest enterprises, private forest owners and local timber industry entities. In the case of timber industry entities, the material can be mixed with imported material during the production process. The detailed analysis of this and the findings are described in Annex 1, while the risk conclusions are summarised in the section "Conclusions". Overview of critical indicators, which were the main subject of discussion with stakeholders, is provided in the section below "Stakeholder consultation".

Minor update 2021

Since the publication of this RRA for Estonia the FSC CNRA has been published and several additional risk factors were identified within Indicator 2.1.2 compared to the SBP RRA. The main objective was to study the FSC CNRA and evaluate if there was a need to adjust SBP RRA accordingly. This was done through the desk-based comparison of the two documents, evaluating new information about these topics and adjusting the SBP RRA for Estonia.

Also, stakeholders have shared some comments in the media about the sustainability of forest management in Estonia, in particular in relation to regional carbon stocks. Since this topic is covered in SBP Standard 1 under Criterion 2.9, it was important to review the RRA for Indicators 2.9.1 and 2.9.2 and verify if the risk designations were still accurate.

3 Stakeholder consultation

Initial Working Body stakeholder consultation 2015

The first Working Body stakeholder consultation round was completed from 26/Mar/2015 to 26/Apr/2015 and the second round from 05/May/2015 to 20/May/2015. The information about the risk assessment process development, along with the draft risk assessment, was sent out to all key stakeholders. The list of stakeholders can be seen in Annex 4. Three stakeholders, the Estonian Fund for Nature (ELF), Graanul Invest AS and the Estonian Forest and Wood Industries Association (EMPL) provided their feedback. See Stakeholder consultation report at Annex 5 for an overview of their comments. Thus, it can be concluded that the main environmental stakeholder group and the industry sector provided their input.

The comments from Graanul Invest and EMPL were related to the indicators assigned with specified risk (1.1.2; 1.4.1; 2.1.2; and 2.8.1) Additional information for changing the level of risk from specified to low risk was proposed by these institutions.

Indicator 1.1.2 Feedstock can be traced back to the defined Supply Base

Initially, specified risk was proposed for this indicator in relation to the supply base in sawmills and other timber processing entities, who might import timber for biomass production from other countries, especially those having a high corruption index (e.g. Belarus and Russia) and/or might mix it with the local timber during the biomass production process. The analyses of the statistical information and available reports indicated that the import of round wood and sawn timber from countries with a high corruption index constitutes a substantial part of the imported timber. However, the additional analyses and information sent by stakeholders indicated that the main part of the imported timber from these countries are re-exported to other countries as pulpwood products or consumed in internal markets and thus not used for biomass production. Only a very small amount of this imported timber is likely to be used for biomass production.

When comparing the total volumes of round wood used in Estonia (approximately 10 million m³) and the amount of imported round wood from Russia (12,000 m³), the amount represents less than 1 %. Moreover, according to the information received during the stakeholder process a lot of this material is pulpwood that does not end up in biomass production. This is because the custom taxes for Russian pulpwood are much lower compared to logs used for lumber production. There are not official statistics of amounts of FSC Controlled wood pulpwood imported to Estonia but according to FSC database the biggest pulpwood users are FSC certified with FSC Credit system in place and FSC controlled wood system implemented. When talking about imported lumber the figures shows that there is 860,000 m³ per year. However considering the fact that lumber is not a material which is used in the biomass production it might not be very relevant here. Lumber should be further processed and the waste from this process could potentially end up in biomass – these volumes vary somewhere between 1-30% out of the total imported lumber. Another fact is that some amount of lumber is re-exported further to EU. Firewood and wood residues imported to Estonia are also small (180,000 t per year) compared to the volumes produced internally in Estonia. These volumes represent supply from low risk countries and specified risk countries. Unfortunately we do not have the exact statistics about the share of material coming from specified risk countries, but according to the overall import statistics about all wooden product groups imported the high risk countries (mainly Russia) share is approximately 30 % from the total amount imported. The number of residues produced from such material that may end up in biomass production is also quite small since outcome of products made from lumber or firewood is high (depending on the product ~70-99 %) The total amount of imported material is also fairly small compared to the amounts produced on site and taking into account that there is some material coming from low risk countries as well and that some of this material is exported from Estonia, the risk would be quite low. In accordance with the additional information received from stakeholders, the risk designation was changed from specified to low risk.

Indicator 1.4.1 The BP has implemented appropriate control systems and procedures to verify that payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting are complete and up to date.

Initially, based on an interview with the Estonian Tax and Customs Board in 2014 and some statistical information about paying VAT, specified risk was proposed for this indicator in relation to paying VAT. According to the additional information received during the stakeholder consultation it appeared that the tax loss of the forestry sector, compared to the total estimated tax loss in Estonia, is 1-2%. The stakeholders also presented a letter from the Minister of Finance, which stated that there is no need to apply new and more strict value added tax system (returned VAT) for Estonian Forest and Wood Industries Association and The Foundation Private Forest Centre. According to the Ministry of Finance the tax loss from the forest sector is very low compared to other sectors.

After the compilation of this risk assessment, a new requirement came into force. This requires that companies must register all invoices that are higher than 1,000 euros in the state database. According to the Tax and Customs Board info, it has already made an additional influence to the VAT declarations, which in early 2015 compared to the same period in 2014 increased by 12%. Also taking into account that the total turnover was a little lower in 2015 than in 2014. According to the information mentioned above the risk status can be considered low for paying VAT.

Indicator 2.1.2 The BP has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities

EMPL and Graanul Invest sent additional information about the protection of Woodland Key Habitat (WKH). Later on NEPCon received addition comments Warmeston OÜ, Purutuli OÜ, Ardor OÜ and Stora Enso Eesti. The content of these additional comments were the same – WKH related risk should be low. Statistics shows that 76.4 % (8,232 WKHs covering area of 16,306 ha) of WKH are situated in state forest and thus protected. The remaining WKH are to be found in private forest areas (3,932 WKHs covering area of 5037 ha). In private forests some of the WKH are situated in different protected areas, some in FSC or PEFC certified forest areas and 204 WKHs are protected by the protection contract (voluntary agreement signed by the forest owner and state). The timber in WKH in private forests amounts to approximately 400,000 m³. The amount that theoretically might end up in biomass production is very small compared to the total amount of material used.

NEPCon requested additional information from the Environmental Agency and from the Ministry of Environment about the felling in WKH. Felling permits for 2-2.5 % per year for WKH areas in private forest areas, which are not covered by WKH contracts have been issued during the last three years. It must be mentioned that not all forest covered by these felling permits will be cut down (according to studies from 2011 60-80% of the issued felling permits will be used) but compared to the total amount of WKH without a WKH contract this amount is still high. WKH that has a protection contract is considered protected.

Even though some WKHs are situated in protected areas it does not necessarily mean that they are protected, because some management activities are allowed in some type of the protection zones. According to the studies done by the Private Forest Owners Union approximately 30% of WKH are situated in this kind of management zones where cutting may be allowed. In protection areas, landowners cannot sign a WKH contract with the state.

Thus, low risk cannot be justified for this indicator and companies sourcing material must mitigate the risk of WKH material entering their production.

Indicator 2.8.1 The BP has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers

Initially, specified risk was proposed for this indicator. This was related to the usage of Health & Safety equipment. During the consultation period, NEPCon received additional information relevant for this indicator from the Estonian Forest and Wood Industries Association. According to their studies, 96% of

all logging is conducted by harvesters, where appropriate working conditions for machine operators are normally in place. At the same time we received statistics from the Police about the fatalities related to self-employed persons (they are not controlled by Labour Inspectorate and accidents with them are therefore not reflected in their statistics). On average 1-3 fatalities annually are related to felling activities. This shows that there is some risk related to the logging. On the other hand, the Environmental Inspectorate together with the Labour Inspectorate have conducted additional inspections to control the fulfilment of the new act, which requires the registration of all workers. Considering the total body of information, it was concluded that the overall risk for this indicator can be considered to be low.

Indicator 2.2.4 The BP has implemented appropriate control systems and procedures to ensure that biodiversity is protected

ELF proposed to change the risk from low to specified risk since some of the protected species populations are experiencing a decline in numbers. The main concern was about the negative trend of Siberian Flying Squirrel who's population trends are decreasing. The reason for this decrease is not caused by forestry only there is a lot related to predators threatening the squirrels. There are conservation areas created for flying squirrel and according to Environmental inspectorate there are no major violations known related illegal activities on such protected areas. So there not much else that forestry sector could do but to follow the restrictions available that they are following. However, the population dynamic of many of the old forest related protected species is favourable and increasing. Also, considering the total share of protected areas in Estonia, general situation with species and habitat protection and biodiversity is still considered good.

The risk conclusion for this indicator was thus maintained as low.

Indicator 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

ELF stated that some misleading information was found in the findings. NEPCon reviewed the findings and removed the misleading information about exact data and carbon calculations. Additionally, specified risk was proposed for this indicator, because wet forest that have drainage systems are also areas of high carbon stocks.

Most of the drainage systems in wet forest types were done before 2008 (with majority of them done before 1991, during the Soviet occupation period). Thus the negative drainage effects in these areas should mainly be seen as a result of historic processes, rather than being subject to continuously expanding drainage. Therefore, it was decided to maintain the level of risk as low.

Indicator 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

ELF proposed that low risk should only be possible in cases where the annual felling volume for Estonia is below 9 million m³. This proposition was based on a study ordered by the Environmental Ministry. NEPCon reviewed the study and consulted with Hardi Tullus, the professor of silviculture from the Estonian University of Life Sciences. Both the report and the interview with the professor showed that no practical studies related to the carbon emission from the forest soil have been done in Estonia. Furthermore, the models used in the studies are not developed for Estonia. Because these carbon calculation models are developed for other countries it is not reasonable to set additional numerical limitations for this indicator. Considering the above information, the risk was maintained as being low and without specifying any numerical felling volume limitations.

For more information please see the findings under each indicator in Annex 1 below.

Working Body stakeholder consultation 2021

In accordance with the RRA Procedure, during a minor revision the WB does not need to conduct a stakeholder consultation. The WB did not conduct a public stakeholder consultation, but has contacted several stakeholders directly to obtain the latest available data and statistics. A public stakeholder

consultation was organised by SBP. Stakeholder comments and SBP's response may be found on the SBP website in a separate document "Estonia RRA Minor Update: Response to Consultation".

4 Conclusions

Based on the information available during the risk assessment process, the level of risk for each of the criteria was chosen. All except one criterion were assigned low risk. Below is the summary of the indicator for which specified risk was identified.

Indicator	Initial Risk Rating		
	Specified	Low	Unspecified
1.1.1		X	
1.1.2		X	
1.1.3		X	
1.2.1		X	
1.3.1		X	
1.4.1		X	
1.5.1		X	
1.6.1		X	
2.1.1		X	
2.1.2	X		
2.1.3		X	
2.2.1		X	
2.2.2		X	
2.2.3		X	
2.2.4		X	
2.2.5		X	
2.2.6		X	
2.2.7		X	
2.2.8		X	
2.2.9		X	
2.3.1		X	
Indicator	Initial Risk Rating		
	Specified	Low	Unspecified
2.4.1		X	
2.4.2		X	
2.4.3		X	
2.5.1		X	
2.5.2		X	
2.6.1		X	
2.7.1		X	
2.7.2		X	
2.7.3		X	
2.7.4		X	
2.7.5		X	
2.8.1		X	
2.9.1		X	
2.9.2		X	
2.10.1		X	

2.3.2		X	
2.3.3		X	

2.1.2 The BP has control systems and procedures to verify that potential threats of forest management activities to the HCVs are identified and safeguards are implemented to protect them

The Working Body has concluded that all identified risks are related to HCVs and should be described under a single indicator, namely, Indicator 2.1.2.

Management activities in the high conservation value forests is regulated by the Nature Conservation Act, Forest Act and related acts and regulations.

The Environmental Inspectorate and the Environmental Board are responsible for controlling the fulfilment of these laws. The Environmental Inspectorate determines sanctions where violations are identified.

WKHs are forest habitats with a high probability of the current occurrence of endangered, vulnerable or rare species. The Woodland Key Habitat (WKH) mapping tool is used to address high conservation value forest habitats in managed forests.

According to Estonian legislation, the protection of WKHs is optional for private forest owners. They can choose to sign a contract with the State to protect WKHs. In such cases, the State pays compensation to the owner for the protection of the WKH. If the private forest owner does not want to protect the WKH they are allowed to cut it.

In State forests and private forests, FSC and PEFC require the protection of registered WKHs.

In accordance with the above the level of risk for this indicator is 'specified' for uncertified private forest and 'low' for both State forests and for FSC or PEFC certified private forest.

In cases where the sourced feedstock derives from private forests, it is important to know exactly where the feedstock was harvested (forest management unit (FMU), sub-compartment). Public databases can be used to determine if the material comes from a WKH. Please see Annex 1 for a description of the detailed mitigation actions.

In 2017, the legal act "Vääriselupaiga klassifikaator, valiku juhend, kaitse korraldamine ning vääriselupaiga kaitseks lepingu sõlmimine ja kasutusõiguse tasu arvutamise täpsustatud alused" ("Woodland Key Habitat classification methodology, selection, protection and protection contract signing and compensation calculation detailed instruction") was changed such that before new WKHs are added to the State registry there must be approval from the landowner who has a conflict of interest. As such potential WKHs in private forests are not always recorded on the public State registry.

In order to protect Natura 2000 habitat types in Natura protection areas, the State has created Special Management Zones and Strict Reserve Zones so that it is possible to protect the majority and most valuable HCVs including Natura 2000 forest habitat types. In these zones commercial forest management is not allowed. As the state has decided that it is not feasible to protect all Natura 2000 forest habitat types with such strict zones some of these habitats are covered with the limited management zones where commercial felling with restrictions is allowed. Today the Board of Environment is not conducting Natura habitat impact assessments each time before issuing felling permits and the felling permits may be issued even if the habitat type will be destroyed or damaged.

Based on the information from FSC Estonia and relevant stakeholders there are approximately 700 mapped sacred grounds and Cross Tree Sites (sites with one or more culturally significant Cross Trees - in Estonian "ristipuud") that are fully or partly on forest land. Additionally, they estimate that there is a

number of unmapped natural sacred grounds. According to Estonian legislation, harvesting is allowed in unprotected natural sacred grounds and Cross Trees are not legally protected from logging. When these areas and objects are protected by the Heritage Conservation Act, restrictions set by Heritage Board need to be followed. In the opinion of interested stakeholders, the Heritage Board restrictions do not protect these sites in the way they would like to see it.

Based on latest information from the Heritage Board Natural sacred Grounds inventories have been done approximately on half of Estonia and the results of this inventories are not publicly available. Digitalising their inventory results is still in progress. So, today, the Environmental Board does not have a full overview of inventoried sites and felling that is taking place on Natural Sacred Grounds will not be subject to any additional restrictions by the Heritage Board.

As a risk mitigation measure in the FSC Controlled Wood system a map was created by stakeholders of the relevant areas and objects. It is important to note that a mapping and classification methodology has not been formally agreed between State agencies and stakeholders and, therefore, differences in interpretation remain.

Based on the information above there are five specified risk objects under this Indicator:

- Officially registered WKHs
- Potential WKHs
- Natura forest habitat types that are in Natura protection areas limited management zones
- Natural Sacred grounds
- Cross trees

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 specified risks above are valid only for non-certified private forests (that is, a Supply Base Evaluation is not required for the feedstock sourced with the SBP-approved Forest Management scheme claim).

Annex 1: Detailed findings for Supply Base Evaluation indicators

	Indicator
1.1.1	The Biomass Producer's Supply Base is defined and mapped.
Finding	<p>The wood based input material comes from state forest enterprises, cooperative societies unifying a number of private forest owners, separate private forest owners, sawmills and other timber industry entities importing and producing (material received during timber processing, material from energetic plantations and material received from outside forests) the wooden products. The main products provided for the market from sawmills and other timber industry entities in general are pellets, shavings, sawdust and chips. Pellets and chips in the supply chain could be received from primary producers in Estonia such as state forest enterprises, private forest owners and other local timber industry entities or importing and/or producing it during timber processing when mixing local timber material with other imported material. Nevertheless the definition of the supply base on the production level (sawmills, etc.) is clear, however the tracing back to the defined supply base could cause the problem. Therefore the specified risk was proposed for criteria 1.2.1 (please, see the criteria 1.2.1).</p> <p>In regards to the supply base and mapping on the forest level the main planning document, which serves as a description of the supply base in both state and private forests, is Forest management plan or only forest inventory data (management plan, that contains inventory data and is technically an illustrated printout of forest inventory data, is not compulsory in Estonia) where the detailed description, assessment, monitoring and planning of forest resources with corresponding maps are defined for forest owners. The Regulations on preparation of forest management schemes and forest management plans defines the procedures for preparation, approval, registration, content and quality review of forest management plans. Forest management plans are prepared for 10 years period and include forest resource analyses of previous period as well as detailed resource description and data inventory records of the current cycle. Instruction on forest management planning defines the requirements for data and map description to be included into the management plan. In forest management plans the maps (M1:10 000) are used for illustrating the planned activities and locations of different units but all the information, including maps, is also publicly available in Public Forest Registry (http://register.metsad.ee/avalik/). On this site it is possible to search all registered land units and add map layers of issued felling permits, nature conservation objects, woodland key habitats etc. to web based map. The mentioned instructions as well as Rules for forest management plan preparation define the content of forest management plans, including forest inventory records, their detailed distribution according various indicators and characteristics (age, forest type, forest site, etc.).</p>

	<p>It is worth mentioning that all state forest is certified according to FSC and PEFC forest management and chain of custody standard in which the indicators related to forest management planning, maps and availability of forest inventory records are being constantly evaluated and addressed</p>
Means of Verification	<ul style="list-style-type: none"> • The Scope is defined and justified • Maps to the appropriate scale are available • Public forest registry: http://register.metsad.ee/avalik/ - link works only in Estonia
Evidence Reviewed	<ul style="list-style-type: none"> • Forest Act - (Metsaseadus. Vastu võetud 07.06.2006 RT I 2006, 30, 232, jõustumine 01.01.2007, osaliselt 01.07.2007) Chapter 1 - General provisions, chapter 2 - Direction of forestry, chapter 3 - Forest survey, chapter 4 - Forest management • Forest management regulation (Metsa majandamise eeskiri Vastu võetud 27.12.2006 nr 88 • RTL 2007, 2, 16, jõustumine 12.01.2007) All paragraphs • Forest Inventory Guidelines (Metsa korraldamise juhend • Vastu võetud 16.01.2009 nr 2, RTL 2009, 9, 104) All chapters. • Yearbook Forest 2013. Available: http://www.keskkonnainfo.ee/main/index.php/et/vaeljaanded-ja-uelevaated/vaeljaanded-ja-uelevaated
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
1.1.2	Feedstock can be traced back to the defined Supply Base
Finding	<p>The initial analyses of the timber and its products import showed that the import of round wood, sawn wood and other timber products from risky countries (for instance, Russia and Belarus) constitute the significant number out of which the certain amount could be mixed with local timber during the timber processing. The production process in sawmills is quite complicated in terms of tracking the source and amount of mixed timber, especially when it is mixed with timber from risky countries. Therefore, initially, the specified risk was proposed for this indicator in relation to supply base in sawmills and other timber processing entities, which might import timber for biomass production from other countries, especially those having a high corruption index (for instance Belarus and Russia) and/or might mix it with the local timber during the biomass production process. Nevertheless, the analyses of statistical information and available reports indicated that the import of round wood and sawn timber from countries with high corruption index (for instance: Russia and Belarus) constitutes the substantial part in the total timber import basket. However, the additional analyses indicated that the main part of imported timber from such countries are re-exported to other countries as pulpwood products or are being consumed in internal market, not used for biomass production.</p>

	<p>Only a small amount of such imported timber could be used for biomass production.</p> <p>When comparing the total volumes of round wood used in Estonia (approximately 10 million m³) for production and the imported round wood amount from Russia (12 000 m³) then this makes indeed less than 1 % and according to information received during the stakeholder process lot of this material is pulpwood that don't end up in biomass production. This is due to the fact that Russian custom taxes for pulpwood are much lower compared to logs used for lumber production and it makes more sense to import this material. There are not official statistics of amounts of FSC Controlled wood pulpwood imported to Estonia but according to FSC database the biggest pulpwood users are FSC certified with FSC Credit system in place and FSC controlled wood system implemented. When talking about imported lumber the figures shows that there is 860 000 m³ per year. However considering the fact that lumber is not a material which is used in the biomass production it might not be very relevant here. Lumber should be further processed and the waste from this process could potentially end up in biomass – this volumes vary somewhere between 1-30% out of the total imported lumber. Another fact is that some amount of lumber is re-exported further to EU. Fire wood and wood residues imported to Estonia are also small (180 000 t per year) compared to the volumes produced internally in Estonia. These volumes presented derives from low risk countries and high risk countries. Unfortunately, we do not have statistics describing solely the material from high risk countries, but these amounts are even smaller. According to additional information received, the risk designation was changed from specified risk to low risk.</p> <p>In regard to the forest level, the majority of logging operations are done based on the requirements of forest management plan and issued felling permits. However, there are some specific types of logging where felling permits are not needed (e.g. pre-commercial thinning or in case the harvested timber volume from sanitary cutting is less than 20 cubic metres per one FMU).</p> <p>The Rules about the issuance of logging licenses, defines what information shall be included in cutting licenses and permissions and how long it shall be stored. In these documents, the supply base could be tracked back to the place of origin with a detailed description of resources, place and time of harvest (type of forest cuttings, forest group, number of compartment and plot, cutting area, species, volume, period, and special conditions, contact details of forest owner, etc.). The mentioned legislation states that cutting licenses shall be kept for a period of 7 years.</p> <p>The schedule of procedures on round wood transportation, produced in private forests, states that the person transporting timber from private forests shall have the timber transportation waybill, a document proving his identity, a cutting permission (in case it is necessary), a forest ownership document (when the cutting permission is not necessary and transportation is carried on by owner) or document proving the legal ownership (contract, etc.) of the timber (when transportation is carried on by contractor). The necessary information to be included in the waybill are defined in the mentioned</p>
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	legislation (contact information of supplier, receiver and deliverer, details about vehicle, the transportation place and time, tree species and volume, the place and time of deliverance). The mentioned legal acts allows a clear link of documents related to transportation trade or export to the specific material in question and to the origin. The Environmental Inspectorate controls how requirements set up in legal acts for trade and transportation, are being implemented. According to Yearbook Forest 2013 statistics 3 violations related to timber transport and 22 violations related to transactions of grooving stock and cutting rates were discovered. to the statistics shows that the number of violations is very low.
Means of Verification	<ul style="list-style-type: none"> Feedstock inputs, including species and volumes, are consistent with the defined Supply Base; Transport documentation and goods-in records are consistent with the defined scope of the SBE. Public forest registry: http://register.metsad.ee/avalik/ - link works only in Estonia Request to Environmental Inspectorate
Evidence Reviewed	<ul style="list-style-type: none"> Forest Act - (Metsaseadus. Vastu võetud 07.06.2006 RT I 2006, 30, 232, jõustumine 01.01.2007, osaliselt 01.07.2007) Chapter 4 - Forest management, paragraphs 37-39 and 41-42 Requirements for forest material transport, form for forest material transfer act, form for sold or purchased forest material or felling right and requirements for the waybill (Metsamaterjali veoeeskiri, metsamaterjali üleandmise-vastuvõtmise akti ja müüdud või ostetud raieõiguse või metsamaterjali kohta Maksu- ja Tolliametile esitatava teatise vorm ning veoselehe kohta esitatavad nõuded [RT I, 09.03.2011, 11 - jõust. 12.03.2011], Vastu võetud 21.12.2006 nr 84, RTL 2006, 93, 1726, jõustumine 01.01.2007) All paragraphs. The convention of international cartage service (CMR) Yearbook Forest 2013. Available: http://www.keskkonnainfo.ee/main/index.php/et/vaeljaanded-ja-uelevaated/vaeljaanded-ja-uelevaated
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
1.1.3	The feedstock input profile is described and categorised by the mix of inputs
Finding	What concerns the forest level, the State Forest Management Center do not undertake timber processing and sell only the primary products: round wood, fuel wood, cutting residues, etc. from forests. The other feedstock producers as the private forest owners or corporative societies can have timber processing facilities but mostly sell their primary products to others. The Schedule of procedures on round wood calculation sets the order, how the round wood shall be accepted (documents and data required) and

	<p>describes the rules of the documented timber tracking system and explain in detail, how the required documents shall be filled. Rules on measurement and volume calculation of round wood and timber of standing forests defines the procedures, definitions, measurement methods, means and places of round wood and are obligatory to all forest owners, managers, traders and suppliers. The aforementioned legislation and established system guarantees that feedstock input profile can be described and categorised by the mix of inputs.</p> <p>The feedstock may also come from secondary producers like planning operations, finger joint operations, furniture producers etc. In this case, the material is sawdust, shavings or chips. The rules for measuring this material are the same as mentioned above.</p>
Means of Verification	Feedstock input records
Evidence Reviewed	<ul style="list-style-type: none"> • Forest Act - (Metsaseadus. Vastu võetud 07.06.2006 RT I 2006, 30, 232, jõustumine 01.01.2007, osaliselt 01.07.2007) Chapter 4 - Forest management, paragraphs 37-39 and 41-42 • Requirements for forest material transport, form for forest material transfer act, form for sold or purchased forest material or felling right and requirements for the waybill (Metsamaterjali veoeeskiri, metsamaterjali üleandmise-vastuvõtmise akti ja müüdud või ostetud raieõiguse või metsamaterjali kohta Maksu- ja Tolliametile esitatava teatise vorm ning veoselehe kohta esitatavad nõuded • [RT I, 09.03.2011, 11 - jõust. 12.03.2011], Vastu võetud 21.12.2006 nr 84, RTL 2006, 93, 1726, jõustumine 01.01.2007] All paragraphs. • Requirements for timber measuring and determination of timber volume (Puidu mõõtmise ja mahu määramise meetodid, mõõtmistäpsusele ning mõõtmistulemuste dokumenteerimisele esitatavad nõuded, Vastu võetud 15.11.2006 nr 64, RTL 2006, 82, 1511, jõustumine 01.01.2007) All chapters.
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
1.2.1	Legality of ownership and land use can be demonstrated for the Supply Base.
Finding	<p>In Estonia, the property registration process is regulated by the laws and regulations mentioned in the column of applicable laws and legislation.</p> <p>Tenure rights can be registered in land registry only if the natural person or legal entity of any form provides relevant documents confirming the legal rights to the land concerned. This would include identification documents (passport, ID card, company registration documents, etc.), sales-purchase agreements, court decisions or other documents proving legal right to own real property. There is no evidence in Estonia that land rights have been issued in violation of</p>

	prevailing regulations and that corruption has been involved in the process of issuing land tenure and management rights. The international corruption perception index for Estonia in 2013 was 68; therefore, corruption is not considered as a key factor negatively influencing this indicator.
Means of Verification	<ul style="list-style-type: none"> Documents demonstrating that the Biomass Producer is a legally defined entity. Documents showing legal ownership, lease, history of land tenure and the actual legal use. In situations where customary rights govern use and access, these rights are clearly identifiable. Long term unchallenged use.
Evidence Reviewed	<ul style="list-style-type: none"> Forest Act (Metsaseadus. Vastu võetud 07.06.2006 RT I 2006, 30, 232, jõustumine 01.01.2007, osaliselt 01.07.2007) Chapter 1 - General provisions, chapter 2 - Direction of forestry, chapter 4 - Forest management Felling permit form and requirements data on felling permit, requirements for registration, requirements for proceed and deadline. (Metsateatisel esitatavate andmete loetelu, metsateatise vorm, esitamise, tagastamise, registreerimise ja menetlemise kord ning tähtajad. Vastu võetud 26.06.2014 nr 27.) All paragraphs. Restrictions on Acquisition of Immovables Act (Kinnisaja omandamise kitsendamise seadus. Vastu võetud 08.02.2012, RT I, 23.02.2012, 11) Chapter 1 - General provisions, chapter 2 - Restrictions on Acquisition of Immovables Used as Profit Yielding Land, chapter 3 - Restrictions on Acquisition of Immovables Arising from National Defence Reasons
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
1.3.1	Feedstock is legally harvested and supplied and is in compliance with EUTR legality requirements.
Finding	<p>In Estonia, detailed and strict legislation covering the process of issuing felling permits exists. The felling permits are issued by the Board of Environment and fulfilment of the requirements is controlled by the Environmental Inspectorate. What concerns the forest level in majority of cases logging operations are done based on the requirements of forest management plan and issued felling permits. However, there are some specific types of logging where felling permits are not needed. In cases of pre-commercial thinning or in case the harvested timber volume is less than 20 cubic metres per one FMU there is no need for felling permit.</p> <p>The Regulations on forest cuttings describes the types of forest cuttings and defines the minimum age of forest trees to be cut which depends on tree species and forest categories.</p> <p>It is required by the law that the owner of round wood must be able to prove the origin of that material. Forest owners are required to follow forest act and related acts and prescriptions from the Environmental Board (if there are any). They must have valid forest inventory or forest management</p>

	<p>plan, felling permit and they must fill a waybill when they are sending the timber away from forest. Saving the related documents for 7 years is also required by the law.</p> <p>All DDS requirements are covered with Estonian legislation (Forest Act § 37, 38, 42). Fulfillment of controlling the requirements of forestry related legislation is controlled by the Environmental inspectorate.</p> <p>During the meeting with representatives of the Environmental Inspectorate that took place 29.09.2014 in NEPCon office it was also concluded that there is no major risk in this area. Inspectorate also pointed out that according to the EU TR article 4 p 3 the written procedures are not required if the local legislation (Forest Act in case of Estonia) covers requirements. From forest Act the applicable paragraphs are 37, 38, 42.</p> <p>According to these all relevant information must be stored and saved.</p> <p>According to the statistics provided by representatives of the Environmental Inspectorate and statistics from the yearbook Forest 2013 the number of violations is small. According to the Yearbook Forest 2013 the number of forestry related offences have decreased from 1010 cases in 2001 to 11 cases in 2013. In the last 5 years, the number of offences has been stable.</p> <p>Transparency international corruption perception index for Estonia in 2014 was 69, therefore corruption is not considered as key factor influencing the possibility to obtain harvesting permits for areas and species that could not be harvested according to the legislation.</p>
Means of Verification	<ul style="list-style-type: none"> • Existing legislation • Level of enforcement • Reference to sources of information in guidance notes • BPs have an up-to-date forest legislation/regulations registry. • BPs demonstrate that the risk of sourcing illegally-harvested feedstock is low. • BPs make use of public information on legal non-compliance, provided by regulatory authorities.
Evidence Reviewed	<ul style="list-style-type: none"> • Riigi Teataja (www.riigiteataja.ee) • http://barometer.wwf.org.uk/what_we_do/government_barometer/scores_by_country/country_answers.cfm?country=Estonia • Presentation "PREPARATIONS FOR IMPLEMENTATION IN ESTONIA" Alar Soo • Nature Conservation Department Friday 8th February 2013, Head of Department - http://www.illegal-logging.info/sites/default/files/uploads/AlarSoo080213.pdf
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
1.4.1	<p>Payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date.</p>
Finding	<p>In Estonia there are no forest harvesting specific fees such as royalties, stumpage fees and other volume based fees. There are also no fees based on quantities, qualities and species.</p> <p>Value added tax (VAT) in Estonia is paid by all persons (natural and legal) having annual turnover from their business activities higher than 16 000 EUR. State Tax Inspectorate is responsible for collection of VAT, which has to be declared every month by tax payer. The Estonian Tax and Customs Board is responsible for collection of VAT, which has to be declared every month by a tax payer.</p> <p>According to statistics provided by Estonian Tax and Customs Board they have conducted 310 controls in 2012 and 552 controls in 2013 in forestry related companies. In 2012, 204 companies were asked to pay some additional sums for taxes, and in 2013, 377 companies were asked to pay additional taxes. Of these payments, some were for value added taxes, some for income taxes and some for both.</p> <p>It is compulsory for round wood sellers and round wood buyers to register all the amounts and sums a database, so the Estonian Tax and Customs board has an overview of the transactions.</p> <p>A specialist from the Estonian Tax and Customs Board has provided their opinion that paying of VAT is still problem <u>in Estonian forestry sector like in any other sector</u>. According to the Estonian Tax and Customs Board, the approximate sum of money that was not paid to the state was 2.5 million Euros in 2013. According to the additional information received during the stakeholder consultation the tax loss of forestry sector is 1-2% compared to the total estimated tax loss. There is also a letter from minister of finance who says to Estonian Forest and Wood Industries Association and The Foundation Private Forest Centre that there is no need to apply new and more strict value added tax system (returned VAT) that was proposed by them. According to the Ministry of Finance the tax loss from forest sector is very low compared to other sectors.</p> <p>After the compilation of this draft risk assessment new requirement came into force that requires that companies must register all invoices to state database that are higher than 1000 euros. By the Tax and Customs Board info, it has already made additional influence on the VAT declarations, which has increased in early 2015 by 12% comparing the same period in 2014, taking also into account that total turnover was little less than 2014.</p> <p>According to the information mentioned above. The risk status can be considered low for paying VAT.</p> <p>In case of State Forest the risk can be considered low since they are audited by the State Control, and according to internal accounting audit program required by the law. All the information related to their management activities are public and according to the information available there has not been any tax fraud by them.</p> <p>There is also income tax that people have to pay.</p>

	<p>There is Taxation Act and Income Tax Act in place. These acts specify the rights, obligations and liabilities of tax authorities and taxable persons, the procedure for tax proceedings and the procedure for the resolution of tax disputes.</p> <p>In 2014 income tax is 21%. In 2015 it will be 20%.</p> <p>The Income Tax Act also specifies requirements for taxing of forest material.</p> <p>Anybody receiving income from selling services or products must declare their incomes by the end of march and this can be done digitally or in the office of Estonian Tax and Customs Board.</p> <p>From 01.07.2014 it is obligatory to register all the workers in Estonian Tax and Customs Board database. This means that it is not possible to work without any kind of contract or registration. This is regulated by the Taxation Act.</p> <p>The Environmental Inspectorate (meeting was held on 29.09.2014) revealed that inspectorate together with Estonian Tax and Customs Board have been conducting weekly controls to forest operations in different counties to control fulfilment of this new regulation and other related regulations. There were no results of these inspections available at the time of preparing of this risk assessment.</p> <p>The Estonian Tax and Customs Board is responsible for controlling tax payments, which is a constant process.</p>
Means of Verification	<p>Records of payments and correspondence with revenue authorities show payments are correct.</p> <p>Krediidinfo database</p> <p>Inquiry to Estonian Tax and Customs Board</p>
Evidence Reviewed	<ul style="list-style-type: none"> • Taxation Act (Maksukorralduse seadus. Vastu võetud 20.02.2002, RT I 2002, 26, 150, jõustunud vastavalt §-le 170.) Chapter 1 - General provisions. • Value-Added Tax Act (Käibemaksuseadus. Vastu võetud 10.12.2003, RT I 2003, 82, 554, jõustunud vastavalt §-le 50.)- All chapters • Income Tax Act (Tulumaksuseadus. Vastu võetud 15.12.1999 RT I 1999, 101, 903, jõustumine 01.01.2000) All chapters • Answer to NEPCons request by Estonian Tax and customs Board (nr 9-6/10725-1 and nr 9-6/10725) • E-mail answer from Estonian Tax and customs Board 03.10.2014 • Letter from Ministry of Finance • Additional information from Tax and Customs Board
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator

1.5.1	Feedstock is supplied in compliance with the requirements of CITES.
Finding	<p>In Estonia there is no CITES tree species growing and according to the information from Ministry of Environment there have been no licenses issued for wood products in Estonia.</p> <p>The procedure set by the above-mentioned regulations is to be followed and the licenses, certificates and other documents as specified in these Regulations are required on bringing in (taking out) animals and plants, parts thereof or articles made of them.</p> <p>The Ministry of environment is responsible for issuing CITES licenses. Estonian Tax and Customs Board and Environmental Inspectorate are responsible of controlling these licenses.</p> <p>CITES species are also not used in biomass production.</p>
Means of Verification	<ul style="list-style-type: none"> • List of species purchased by BP; • Records of field inspections; • Assessment of risk that CITES species may be mixed with non-CITES species, in the supply chain; • Interviews demonstrate that the CITES requirements are understood; • CITES species are known and identified; • Where relevant, the operation possesses permits for harvest and trade in any CITES species.
Evidence Reviewed	<ul style="list-style-type: none"> • CITES (Loodusliku loomastiku ja taimestiku ohustatud liikidega rahvusvahelise kaubanduse konventsioon. Vastu võetud 03.05.1973) All articles. • Answer to NEPCons request by Ministry of the Environment 09.06.2014
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
1.6.1	Feedstock is not sourced from areas where there are violations of traditional or civil rights.
Finding	<p>There are no indigenous people in Estonia since Estonians are native people in their homeland. In Estonia, there are no groups of individuals having customary rights to forest harvesting activities.</p> <p>According to the legislation, people are allowed to be in private forest and in State Forest, pick berries and collect other non-timber products during the day time (except in strict nature reserves and during the nesting season of protected species). When people would like to camp or make a fire in the forest, they need to obtain additional permission from the land owner.</p>

Means of Verification	<ul style="list-style-type: none"> Traditional and civil rights are identified. Procedures are in place to ensure rights are not violated.
Evidence Reviewed	<ul style="list-style-type: none"> The Constitution of the Republic of Estonia Eesti Vabariigi põhiseadus. Vastu võetud 28.06.1992, RT 1992, 26, 349 jõustumine 03.07.1992) Chapter 2 - Main rights, freedoms and responsibilities General Principles of the Law of the Environmental Code (Keskkonnaseadustiku üldosa seadus. Vastu võetud 16.02.2011, RT I, 28.02.2011, 1 jõustumine 01.08.2014, osaliselt 01.01.2015 ja 01.08.2017) Regulates "everymans right" and collects different relevant requirements from different laws. Chapter 4, part 2 - Right to use not owned land or water body.
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
2.1.1	Forests and other areas with high conservation values in the Supply Base are identified and mapped.
Finding	<p>Estonian Forests are well surveyed and all major HCV are identified. All data about different type of protected species, areas and object are collected to state owned database called EELIS (Eesti Looduse Infosüsteem). Some of this information is available to everybody and more sensitive information (I and II category species etc.) only to people and organisations that need to know it because of the work and have signed confidentiality contract with the state. Forestry related protected areas and species can be seen in public forest registry (except I and II category species habitats): http://register.metsad.ee/avalik/</p> <p>For category I protected species, land owners are notified in writing. The system exists for land owners and other stakeholders to have access to the main information. Prior to issuing a felling permit, the existence of protected habitats and species is checked by the Environmental Board.</p>
Means of Verification	<ul style="list-style-type: none"> EELIS database Maps Interviews Regional, publicly available data from a credible third party The existence of a strong legal framework in the region. Public forest registry: http://register.metsad.ee/avalik/ - link works only in Estonia
Evidence Reviewed	<ul style="list-style-type: none"> Forest Act - (Metsaseadus. Vastu võetud 07.06.2006 RT I 2006, 30, 232, jõustumine 01.01.2007, osaliselt 01.07.2007) Chapter 1 - General provisions, 3 - Forest survey, chapter 4 - Forest management Nature Conservation Act - (Looduskaitseeadus Vastu võetud 21.04.2004, RT I 2004, 38, 258, jõustumine 10.05.2004) Chapter 1 - general provisions, chapter 3 -

	Organisation of protection, chapter 4 - protected areas, chapter 5 - Limited-conservation areas, chapter 6 - Shores and Banks, chapter 8 – Species
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
2.1.2	<p>Potential threats to forests and other areas with high conservation values from forest management activities are identified and addressed.</p> <p>Updated in 2021</p> <p>Management activities in the high conservation value forests are regulated by the Nature Conservation Act, Forest Act and related acts and regulations.</p> <p>The Environmental Inspectorate and the Environmental Board are responsible for controlling the fulfilment of these laws. The Environmental Inspectorate determines sanctions where violations are identified.</p> <p>Woodland Key Habitats are forest habitats with a high probability of the current occurrence of endangered, vulnerable or rare species. The WKH mapping tool is used to address high conservation value forest habitats in managed forests.</p> <p>According to Estonian legislation, the protection of WKHs is optional for private forest owners. They can choose to sign a contract with the State to protect WKHs. In such cases, the State pays compensation to the owner for the protection of the WKH. If the private forest owner does not want to protect the WKH they are allowed to cut it.</p> <p>In State forests and private forests, FSC and PEFC require the protection of registered WKHs.</p> <p>Finding</p> <p>In accordance with the above, the level of risk for this indicator is ‘specified’ for uncertified private forest and ‘low’ for both State forests and for FSC or PEFC certified private forest.</p> <p>In cases where the sourced feedstock derives from private forests, it is important to know exactly where the feedstock was cut (forest management unit (FMU), sub-compartment). Public databases can be used to determine if the material comes from a WKH.</p> <p>In 2017, the legal act “Vääriselupaiga klassifikaator, valiku juhend, kaitse korraldamine ning vääriselupaiga kaitseks lepingu sõlmimine ja kasutusõiguse tasu arvutamise täpsustatud alused” (“Woodland Key Habitat classification methodology, selection, protection and protection contract signing and compensation calculation detailed instruction”) was changed in a way that before adding new WKHs to the State registry there has to be an approval from the landowner who has a conflict of interest. As such potential WKHs in private forests are not always recorded on the public State registry.</p> <p>In order to protect Natura 2000 habitat types in Natura protection areas, the State has created Special Management Zones and Strict Reserve Zones so that it is possible to protect the majority and most valuable HCVs including Natura 2000 forest habitat types.</p>

	<p>In these zones commercial forest management is not allowed. As the state has decided that it is not feasible to protect all Natura 2000 forest habitat types with such strict zones some of these habitats are covered with the limited management zones where commercial felling with restrictions is allowed. Today the Board of Environment is not conducting Natura habitat impact assessments each time before issuing felling permits and the felling permits are issued even if the habitat type will be destroyed or damaged.</p> <p>Based on the information from FSC Estonia and relevant stakeholders there are approximately 700 mapped sacred grounds and Cross Tree Sites (sites with one or more culturally significant Cross Trees - in Estonian "ristipuud") that are fully or partly on forest land. Additionally they estimate that there are a number of unmapped natural sacred grounds. According to Estonian legislation harvesting is allowed in unprotected natural sacred grounds and Cross Trees are not legally protected from logging. When these areas and objects are protected by the Heritage Conservation Act, restrictions set by Heritage Board need to be followed. In the opinion of interested stakeholders the Heritage Board restrictions do not protect these sites in the way they would like to see it.</p> <p>Based on latest available information from the Heritage Board Natural Sacred Grounds inventories have been done approximately on half of Estonia and the results of this inventories are not publicly available. Digitalising their inventory results is still in progress. So, today, the Environmental Board does not have a full overview of the inventoried sites and felling that is taking place on Natural Sacred Grounds will not be subject to any additional restrictions by the Heritage Board.</p> <p>As a risk mitigation measure in the FSC Controlled Wood system a map was created by stakeholders of the relevant areas and objects. It is important to note that a mapping and classification methodology has not been formally agreed between State agencies and stakeholders and, therefore, differences in interpretation remain.</p> <p>Based on the information above there are five specified risk objects under this indicator:</p> <ul style="list-style-type: none"> • Officially registered WKHs • Potential WKHs • Natura forest habitat types that are in Natura protection areas limited management zones • Natural Sacred grounds • Cross trees <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 specified risks above are valid only for non-certified private forests (that is, a Supply Base Evaluation is not required for the feedstock sourced with the SBP-approved Forest Management Scheme claim).</p>
Means of Verification	<ul style="list-style-type: none"> • Maps from EELIS database • Guidance provided by BPs to suppliers/forest operators, regarding threats to the identified forests and areas of high conservation values, and verification of conformance through field inspections • Regional Best Management Practices • Standard Operating Procedures

	<ul style="list-style-type: none"> • Codes of Practice • Records of BP's field inspections • Monitoring records • Interviews with staff • Public forest registry: http://register.metsad.ee/avalik/
Evidence Reviewed	<ul style="list-style-type: none"> • Forest Act - (Metsaseadus. Vastu võetud 07.06.2006 RT I 2006, 30, 232, jõustumine 01.01.2007, osaliselt 01.07.2007) Chapter 1 - General provisions, 3 - Forest survey, chapter 4 - Forest management • Nature Conservation Act - (Looduskaitseseadus Vastu võetud 21.04.2004, RT I 2004, 38, 258, jõustumine 10.05.2004) Chapter 1 - general provisions, chapter 3 - Organisation of protection, chapter 4 - protected areas, chapter 5 - Limited-conservation areas, chapter 6 - Shores and Banks, chapter 8 – Species • Statistics about felling permit issued in WKH from Environmental Agency • FSC Centralised National Risk Assessment for Estonia: https://fsc.org/en/document-centre/documents/resource/309
Risk Rating	<input type="checkbox"/> Low risk <input checked="" type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
2.1.3	Feedstock is not sourced from forests converted to production plantation forest or non-forest lands after January 2008.
Finding	<p>Conversion is regulated by Forest Act and related acts listed below.</p> <p>Conversion is the cutting that is done in order to enable the use of land for purposes other than silviculture. Conversion may be carried out in Estonia on the basis of building design documentation conforming to the provisions of the Building Act or Land Improvement Act, or on the basis of an operational plan of the electrical installation conforming to the provisions of the Electrical Safety Act if the preparation of a detailed plan is not mandatory or on the basis of other valid design documentation, maintenance schedule or document arising from legislation which serves as the basis for the use of land for purposes other than forest management.</p> <p>Permission for conversion is issued by the Environmental Board and controlled by the Environmental Inspectorate. The decision is made by the local government who must check that the conversion is not in conflict with the local plan or the county plan. They must also consider the local peoples opinion.</p> <p>According to FAO data, during 2000 - 2005, average annual change in the forest cover was +0.4 %.</p>

	<p>According to the "Yearbook Forest 2013", that gives annual reports and facts about the forest in Estonia, the loss of the forest land (land registered as forest) between 2005 and 2012 was 1,3 % (total forest area 2 233900 ha in 2012 and 2 264 200 in 2005).</p> <p>During the meeting with representatives of the Environmental Inspectorate that took place the 29.09.2014, it was also concluded that there is no major risk in this area. No large scale conversion of forest lands is taking place in Estonia and large scale conversions are not possible due to different legislation.</p> <p>There are no cases known where the forest has been converted to production plantation. The wood production plantations have been found on the agricultural land.</p> <p>According to the information provided above there is a small scale conversion on agricultural soil, according to the statistics but according to Environmental Inspectorate there is no problems with illegal conversions.</p>
Means of Verification	<ul style="list-style-type: none"> • Historical maps and consultation with stakeholders. • Regional, publicly available data from a credible third party • The existence of a strong legal framework in the region.
Evidence Reviewed	<ul style="list-style-type: none"> • Riigi Teataja (www.riigiteataja.ee) • State of the World's Forests 2007. FAO (Food and Agriculture Organisation of the United Nations). 2007. • (Available at http://www.fao.org/docrep/009/a0773e/a0773e00.htm). • http://www.globalforestwatch.org/country/EST • Yearbook Forest 2013 - Forest statistics about Estonia • Nature Conservation Act - (Looduskaitseeadus Vastu võetud 21.04.2004, RT I 2004, 38, 258, jõustumine 10.05.2004) Chapter 3 - Organisation of protection, chapter 11 - Responsibility • Forest Act -(Metsaseadus. Vastu võetud 07.06.2006 RT I 2006, 30, 232, jõustumine 01.01.2007, osaliselt 01.07.2007) Chapter 4 - Forest management, chapter 7 - Final provision § 32 that indicates under which conditions it is allowed to convert forest land, it also indicates the acts that are related to the need of convert some forest • Planning Act - (Planeerimisseadus. Vastu võetud 13.11.2002 RT I 2002, 99, 579, jõustumine 01.01.2003) Chapter 1 - General provisions, chapter 2 - Types of plannings, chapter 3 - Preparation of spatial plans and participation of the public in such preparation
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
2.2.1	Feedstock is sourced from forests where there is appropriate assessment of impacts, and planning, implementation and monitoring to minimise them.
Finding	The main planning document where the assessment of impacts, and subsequent planning, implementation and monitoring are defined for forest owners, is the forest

	<p>management plan. The Forest Act and Forest Inventory guidelines set rules for persons and companies who conduct forest inventory and create management plans. Taxators must have taxator licenses and companies must have forest inventory permission for this. For gaining this license persons must have forestry education and must conduct a taxator exam. New forest management plans are checked by the Environmental Agency to ensure that all applicable legislation is followed.</p> <p>Forestry inventories are uploaded to public database and can be seen by any interested party. The requirement for planning forest management activities are same for state and private forest. Forest management plans include analyses, monitoring results and the description of management impact of previous period. During the preparation process of new management plan all relevant data shall be collected and together with analyses of previous management cycle shall be fed back into new management plan and consequently into operation practice.</p> <p>In addition, State Forest Management Centre has developed their own environmental impact assessment procedures for activities, which could have negative impact to environment, for instance: road reconstruction, drainage, the construction of gas or electricity lines, etc. There is the prevailing practice to include in the agreements with contractors the requirement to inform the forest owner about observed potential negative impacts of forest operation to biodiversity and ecosystems and to take preventing measures to avoid or minimise it.</p> <p>There are different environmental NGO's and also universities which periodically monitor several aspects of forest operation impact to environment or carries different inventories or monitoring projects. The various monitoring results in the form of databases, project results, national forest inventory, and statistical data are available on different portals and websites of responsible institutions, such as the EELIS database https://www.eelis.ee/ etc. It should be mentioned that all forests certified according to FSC forest management and chain of custody standard in which the indicators related to monitoring, environmental impact assessment are being constantly evaluated and addressed.</p> <p>Therefore, the monitoring procedures and data availability ensure that both in state and private forests the BP has control systems and procedures to verify that feedstock is sourced from forests where there is appropriate assessment of impacts, and subsequent planning, implementation and monitoring to minimise impacts.</p> <p>It is also allowed to take stumps from the forest but this is not widespread practice in Estonia because it is expensive and the stumps need to be cleaned from dirt that is time-consuming process. According to the information available, the main biomass producers do not use stumps in their production.</p>
Means of Verification	<ul style="list-style-type: none"> • Regional Best Management Practices; • Supply contracts; • Assessment of potential impacts at operational level • Assessment of measures to minimise impacts • Monitoring results • Publicly available information on protecting the values identified • Level of enforcement

	<ul style="list-style-type: none"> • Regional, publicly available data from a credible third party • The existence of a strong legal framework in the region. • Public forest registry: http://register.metsad.ee/avalik/ - link works only in Estonia
Evidence Reviewed	<ul style="list-style-type: none"> • Forest Act - (Metsaseadus. Vastu võetud 07.06.2006 RT I 2006, 30, 232, jõustumine 01.01.2007, osaliselt 01.07.2007) Chapter 1 - General provisions, chapter 2 - Direction of forestry, chapter 3 - Forest survey, chapter 4 - Forest management • Forest management regulation (Metsa majandamise eeskiri Vastu võetud 27.12.2006 nr 88 RTL 2007, 2, 16, jõustumine 12.01.2007) All paragraphs • Forest Inventory Guidelines (Metsa korraldamise juhend. Vastu võetud 16.01.2009 nr 2, RTL 2009, 9, 104) All chapters. • Requirements for the test works and examination of forest taxators and rules for evaluating the results of test works and exams (Metsakorraldaja katsetöödele ja eksamitele esitatavad nõuded, katsetööde ja eksamite korraldamise ning tulemuste hindamise ja metsakorraldaja tunnistuse andmise kord) • [RT I, 29.07.2014, 3 - jõust. 01.08.2014], Vastu võetud 21.12.2006 nr 82, RTL 2006, 93, 1724, jõustumine 01.01.2007- All paragraphs. • Rules for applying, issuing and extension of forest inventory and taxation license (Metsakorraldustööde tegevusloa taotlemise, andmise ja pikendamise kord, metsakorraldustööde tegevusloa vorm ning metsakorraldustööde tehnilistele vahenditele esitatavad nõuded ja nende nõuetele vastavuse hindamise kord. Vastu võetud 04.01.2007 nr 1, RTL 2007, 4, 65, jõustumine 15.01.2007) All chapters. • Public Forest Registry (http://register.metsad.ee/avalik/)
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
2.2.2	Feedstock is sourced from forests where management maintains or improves soil quality (CPET S5b).
Finding	<p>Updated in 2021</p> <p>The law requires that all forest operations shall be planned and implemented in accordance with the requirements of the Act's Forest Management Regulation. These include requirements for protection of nesting places of rare and endangered bird species, as well as requirements to leave trees, dead wood for biodiversity protection and soil protection.</p> <p>The maintenance of buffer zones along water courses or open areas, as well as some limitation in relation to protection of soil against erosion is covered also in the Forest Management Regulation. Forest management limitations are also related to some more sensitive forest soil types (no soil preparations allowed during regeneration etc.). The allowed limits of soil destructions and the timeline for forest owners to repair the damage done to forest soil are also mentioned. In protection areas usually additional measures to protect soil is described in</p>

	<p>protection acts. Most commonly additional measures foresee that forwarding material from cutting site shall be done in frozen soil or with dry soil.</p> <p>The Environmental Inspectorate is responsible for constantly controlling fulfilment of these laws.</p> <p>According to the statistics provided by the Environmental Inspectorate, 938 sites were controlled during 2012 and 990 were controlled during 2013. The number of violations related to environmental requirements in 2012 was 22 and in 2013 was 14.</p> <p>During the meeting with representatives of the Environmental Inspectorate that took place 29 September 2014, it was also concluded that the protection system is functioning well and there is no major risk in this area. The violations have been detected are small scale, for example: some soil damage or small scale cuttings in buffer zones. There is no major difference in compliance between the state forest and private forest. Where violations are detected in the state forest, the damage is rectified much more quickly.</p> <p>Environmental Inspectorate has been requested to provide more recent data on the topic. According to their response there is very low number of soil damage related violations in last year's data, considering the amount of fellings done on a yearly base. According to Environmental inspectorate there were three soil damage related violations in 2016, four in 2017 and 2018, three in 2019 and ten in 2020.</p> <p>According to the statistics provided above and information from the Environmental Inspectorate, the level of risk for this indicator is considered low.</p>
Means of Verification	<ul style="list-style-type: none"> • Regional Best Management Practices; • Supply contracts; • Records of BP's field inspections; • Assessment at an operational level of measures designed to minimise impacts on the values identified; • Monitoring records; • Publicly available information on the protection of soil; • Level of enforcement. of legislation
Evidence Reviewed	<ul style="list-style-type: none"> • Forest Act - (Metsaseadus. Vastu võetud 07.06.2006 RT I 2006, 30, 232, jõustumine 01.01.2007, osaliselt 01.07.2007) Chapter 1 - General provisions, 3 - Forest survey, chapter 4 - Forest management • Nature Conservation Act - (Looduskaitseeadus Vastu võetud 21.04.2004, RT I 2004, 38, 258, jõustumine 10.05.2004) Chapter 1 - general provisions, chapter 3 - Organisation of protection, chapter 4 - protected areas, chapter 5 - Limited-conservation areas, chapter 6 - Shores and Banks, chapter 8 – Species • Forest management regulation (Metsa majandamise eeskiri Vastu võetud 27.12.2006 nr 88 • RTL 2007, 2, 16, jõustumine 12.01.2007) All paragraphs. • Protection acts of protected areas that are found in www.riigiteataja.ee database.
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
2.2.3	Key ecosystems and habitats are conserved or set aside in their natural state (CPET S8b).
Finding	<p>Updated in 2021</p> <p>Management activities in the high conservation value forests is regulated by Nature Conservation Act, Forest Act and related acts and regulations.</p> <p>Estonian Forests are well surveyed and all major HCV are identified. All data about different type of protected species, areas and object are collected to state owned database called EELIS (Eesti Looduse Infosüsteem).</p> <p>According to Yearbook Forest 2013, there are the following protection areas in Estonia (31 December 2013):</p> <p>Five national parks, 138 nature conservation areas, 151 landscape conservation areas, 344 conservation areas (hoiuala), 1350 special species protection areas (püselupaik), 111 conservation areas with old protection regime, 21 protection objects under local municipality protection, over 1200 single protection objects. There are 217 027 ha (9.7% of forest land) strictly protected forests (no management activities allowed) and 339 923 ha (15.2 % of forest area) of limited management zones.</p> <p>According to EELIS database (www.EELIS.ee) there are following protection areas in Estonia (31 December 2020):</p> <p>Six national parks, 231 nature conservation areas, 156 landscape conservation areas, 319 conservation areas (hoiuala), 1633 special species protection areas (püselupaik), 38 conservation areas with old protection regime, 22 protection objects under local municipality protection, over 1076 single protection objects, 22 single protection objects on local municipality level, 471 protected parks and forest stands.</p> <p>There are 14.1% of strictly protected forests (no management activities allowed) and 11.3 % of forest area of limited management zones (2019 data). So 25.4% of forest land is under some kind of protection regime.</p> <p>All the important key ecosystems are under some kind of protection, under some protection regime or classified under WKH. Risks related to WKHs, potential WKHs as well as Natura forest habitat types that are in Natura protection areas limited management zones are described under 2.1.2</p> <p>According to Environmental inspectorate there are no major violations in protected areas.</p> <p>See Indicators 2.1.2 and 2.1.1</p>
Means of Verification	<ul style="list-style-type: none"> • Maps from EELIS database • Guidance provided by BPs to suppliers/forest operators, regarding threats to the identified forests and areas of high conservation values, and verification of conformance through field inspections • Regional Best Management Practices • Standard Operating Procedures • Codes of Practice

	<ul style="list-style-type: none"> Records of BP's field inspections Monitoring records In Public forest registry: http://register.metsad.ee/avalik/ - link works only in Estonia
Evidence Reviewed	<ul style="list-style-type: none"> Forest Act - (Metsaseadus. Vastu võetud 07.06.2006 RT I 2006, 30, 232, jõustumine 01.01.2007, osaliselt 01.07.2007) Chapter 1 - General provisions, 3 - Forest survey, chapter 4 - Forest management Nature Conservation Act - (Looduskaitseseadus Vastu võetud 21.04.2004, RT I 2004, 38, 258, jõustumine 10.05.2004) Chapter 1 - general provisions, chapter 3 - Organisation of protection, chapter 4 - protected areas, chapter 5 - Limited-conservation areas, chapter 6 - Shores and Banks, chapter 8 – Species EELIS database
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
2.2.4	Biodiversity is protected (CPET S5b).
Finding	<p>Updated in 2021</p> <p>Biodiversity related requirements are listed in the Nature Conservation Act, Forest Act and related acts and regulations.</p> <p>The Forest Management Regulations state the amount of biodiversity trees that need to remain after felling and the requirements for these trees. Also stated are the biodiversity related requirements for different felling types. It is forbidden to remove residues from poor soil types (heath forests and alvar forests).</p> <p>The Forest Act states the different forest types and requirements for fellings in these forest types, for example, the area of felling, species composition etc. The Forest Act must ensure that forest management ensures biological diversity, the productivity, regeneration capacity and vitality of forests, and the possibility of multiple uses of forest in a way that satisfies ecological, economic, social, and cultural needs.</p> <p>The Nature Conservation Act sets rules for management in nature conservation areas and in the protected species habitats (restrictions for felling times, area etc.).</p> <p>The management of Estonian forest is based on a forest management plan, where protected species, habitats and other environmental protection values or objects are listed, marked on the maps with prescribed and detailed protection measures. All information about protected species and habitats is listed in EESLIS database.</p>

	<p>The Environmental Inspectorate is responsible for constantly controlling fulfilment of these laws.</p> <p>According to the statistics provided by the Environmental Inspectorate, 938 sites were controlled during 2012 and 990 were controlled during 2013. The number of violations related to environmental requirements in 2012 was 22 and in 2013 was 14.</p> <p>In 2021, the Environmental Inspectorate was requested to provide more recent data on the topic. According to their response there were 11 Nature Conservation Act related violations in 2016, nine in 2017, 11 in 2018, 17 in 2019 and 20 in 2020.</p> <p>During the meeting with representatives of the Environmental Inspectorate that took place on 29 September 2014, it was concluded that the protection system is functioning well and there is no major risk in this area. The violations have been detected are small scale, for example, some soil damage or small scale cuttings in buffer zones. There is no major difference in compliance between the state forest and private forest.</p> <p>The same conclusion was made after a communication with the Environmental Inspectorate in 2021. When violations are detected in the state forest, the damage is rectified much more quickly.</p> <p>There is effective legislation in place to protect species, to map new habitats and protect those habitats. 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 and often exceeds the practices in neighbouring countries.</p> <p>Risks related to WKHs, potential WKHs as well as Natura forest habitat types that are in Natura protection areas limited management zones are described under Indicator 2.1.2 above.</p>
Means of Verification	<ul style="list-style-type: none"> • Regional Best Management Practices; • Supply contracts; • Assessment of potential impacts at operational level and of measures to minimise impacts; • Monitoring results; • Publicly available information on the protection of the values identified; • Level of enforcement • Regional, publicly available data from a credible third party • Public forest registry: http://register.metsad.ee/avalik/ - link works only in Estonia • EELIS database
Evidence Reviewed	<ul style="list-style-type: none"> • Forest Act - (Metsaseadus. Vastu võetud 07.06.2006 RT I 2006, 30, 232, jõustumine 01.01.2007, osaliselt 01.07.2007) Chapter 1 - General provisions, 3 - Forest survey, chapter 4 - Forest management • Nature Conservation Act - (Looduskaitseeadus Vastu võetud 21.04.2004, RT I 2004, 38, 258, jõustumine 10.05.2004) Chapter 1 - general provisions, chapter 3 - Organisation of protection, chapter 4 - protected areas, chapter 5 - Limited-conservation areas, chapter 6 - Shores and Banks, chapter 8 – Species • Forest management regulation (Metsa majandamise eeskiri Vastu võetud 27.12.2006 nr 88 • RTL 2007, 2, 16, jõustumine 12.01.2007) All paragraphs.

	<ul style="list-style-type: none"> • Yearbook Forest 2013 http://www.keskkonnainfo.ee/main/index.php/et/component/content/article/184?tmpl=component
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
2.2.5	The process of residue removal minimises harm to ecosystems.
Finding	<p>The forest operations shall be planned and implemented in accordance with the requirements set up in the act Forest Management regulations. In the mentioned act the ways and time limit of cleaning the felling site from the residuals are listed. There are different ways to do it but in all cases it must be done in a way that does not damage remained trees (including natural regeneration). In the Forest Act it is also mentioned the need to clean the felling site from the residuals after the final felling and also the fines in case the felling site is not cleaned. It must be mentioned that in case residual removing is planned after the final felling there is always some amount that is not removed because these are used in soil protection when taking the material out from the forest.</p> <p>There are some studies about the influence of removing the residuals from the forest and according to the data available, it can be said that there are changes in the composition of insect, fungi and plant species. The main influence is coming from removing the stumps (that is not common practice in Estonia). When removing the residuals there is no major influence to forest ecosystems.</p>
Means of Verification	<ul style="list-style-type: none"> • Regional Best Management Practices; • Supply contracts; • Records of BP's field inspections; • Assessment at an operational level of measures designed to minimise impacts on the values identified; • Monitoring records;
Evidence Reviewed	<ul style="list-style-type: none"> • Forest management regulation (Metsa majandamise eeskiri Vastu võetud 27.12.2006 nr 88 • RTL 2007, 2, 16, jõustumine 12.01.2007) Paragraph 9. • Forest Act - (Metsaseadus. Vastu võetud 07.06.2006 RT I 2006, 30, 232, jõustumine 01.01.2007, osaliselt 01.07.2007) Chapter 1 - General provisions, 3 - Forest survey, chapter 4 - Forest management • Article in Estonian Forest magazine: http://www.loodusajakiri.ee/eesti_mets/artikkel1287_1273.html
Risk rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk

Comment or Mitigation Measure	
	<p style="text-align: center;">Indicator</p>
2.2.6	<p>Negative impacts on ground water, surface water, and water downstream from forest management are minimised (CPET S5b).</p>
Finding	<p>The Law on Water regulates the protection and monitoring of water resources (including water courses in forests) in Estonia.</p> <p>In Nature Conservation Act there are listed restrictions to different activities in different water protection zones.</p> <p>The special management regime is set in forest management plans or management documents of protected areas where these forests are located in order to protect water bodies from damage, pollution, etc. All the maps of different kind of water protection zones are always available in forest management plans. Forest cuttings are allowed depending on the management and protection regime assigned based on the forest group.</p> <p>Using residuals to build temporary bridges over ditches and springs is allowed, but cleaning the residuals after finishing the work is a requirement.</p> <p>During the meeting with representatives of the Environmental Inspectorate that took place on the 29.09.2014 this topic was also discussed. It was concluded that the protection system is well functioning and there is no major risk in this area. The violations have been detected are small scale, for example: some soil damage or small scale cuttings in buffer zones. There is no major difference in compliance between the state forest and private forest. Where violations are detected in the state forest, the damage is rectified much more quickly.</p> <p>The risk is considered low for this indicator.</p>
Means of Verification	<ul style="list-style-type: none"> • Regional Best Management Practices; • Supply contracts; • Records of BP's field inspections; • Assessment at an operational level of measures designed to minimise impacts on the values identified; • Monitoring records; • Inquiry from Environmental Inspectorate • Publicly available information on the protection of soil; • Level of enforcement.
Evidence Reviewed	<ul style="list-style-type: none"> • Law on Water (Veeseadus. Vastu võetud 11.05.1994 RT I 1994, 40, 655 jõustumine 16.06.1994) Chapter 5 – Protecting water body from damage • Nature Conservation Act - (Looduskaitseeadus Vastu võetud 21.04.2004, RT I 2004, 38, 258, jõustumine 10.05.2004) Chapter 1 - general provisions, chapter 3 - Organisation of protection, chapter 4 - protected areas, chapter 5 - Limited-conservation areas, chapter 6 - Shores and Banks

Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
2.2.7	Air quality is not adversely affected by forest management activities.
Finding	<p>The Ambient Air Protection Act regulates the protection, management and monitoring of ambient air pollution. There is no indication of any damage of influence to air quality of forest operations. There are also mentioned the normatives for machinery polluting the air (including forest machinery). The cutting technique and its use does not cause impact to air quality. Usually forest operation are in the remote places and do not affect the air quality. The air quality is impacted by biomass users, who burn biomass in the power plants, households or other facilities.</p> <p>The monitoring and statistical data about air quality and its tendency can be found in the website of the Environmental Agency:</p> <p>http://seire.keskkonnainfo.ee/index.php?option=com_content&view=article&id=645&Itemid=184 .</p>
Means of Verification	<ul style="list-style-type: none"> • Regional Best Management Practices; • Supply contracts; • Records of BP's field inspections; • Assessment at an operational level of measures designed to minimise impacts on the values identified; • Monitoring records; • Level of enforcement. • Regional, publicly available data from a credible third party • The existence of a strong legal framework in the region.
Evidence Reviewed	<ul style="list-style-type: none"> • Ambient Air Protection Act (Vastu võetud 05.05.2004 RT I 2004, 43, 298 jõustumine 30.09.2004, osaliselt 27.11.2004. a). Chapter 2 – methods of minimising the air pollution • Data on State ambient air monitoring (Keskkonnaagentuur)
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator

2.2.8	There is controlled and appropriate use of chemicals, and that Integrated pest management (IPM) is implemented wherever possible in forest management activities (CPET S5c).
Finding	<p>In act Forest management regulations it is regulated the use of pesticides. It is allowed to use pesticides in forest only on the basis of forest protection expertise. In case of using any pesticides the requirements of the Plant Protection Act must be also followed.</p> <p>In case pesticides are used in plantations the same requirements from the Plant Protection Act must be followed.</p> <p>In State forest the pesticides are used only in special cases. There have been no such cases in recent years (information from FSC FM audits). During the FSC FM audits in state forest requirements related to use of chemicals is evaluated annually.</p> <p>The use of chemicals in private forests is not very common, however they shall follow the general legislation related to the plant protection products.</p> <p>The use of any kind of pesticides must be recorded by the forest owner.</p> <p>The use of chemicals is controlled by Environmental board and Ministry of Agriculture.</p>
Means of Verification	<ul style="list-style-type: none"> • Existing legislation; • Level of enforcement; • Regional Best Management Practices; • Supply contracts; • Records of BP's field inspections; • Assessment at an operational level of measures designed to minimise impacts on the values identified; • Monitoring records; • Request to Board of Environment • Interview with Environmental Inspectorate
Evidence Reviewed	<ul style="list-style-type: none"> • Forest management regulation (Metsa majandamise eeskiri Vastu võetud 27.12.2006 nr 88 RTL 2007, 2, 16, jõustumine 12.01.2007) All paragraphs. • Plant Protection Act (Vastu võetud 21.04.2004 RT I 2004, 32, 226 jõustumine 01.05.2004) Chapter 2 – Plant health • Forest Act - (Metsaseadus. Vastu võetud 07.06.2006 RT I 2006, 30, 232, jõustumine 01.01.2007, osaliselt 01.07.2007) Chapter 1 - General provisions, 3 - Forest survey, chapter 4 - Forest management
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
2.2.9	Methods of waste disposal minimise negative impacts on forest ecosystems (CPET S5d).

Finding	<p>The Waste Act defines the different types of waste and requirements of waste disposal. The management, functions of responsible institutions, monitoring, and storage and other waste management procedures are defined in this Law.</p> <p>In Forest Act the fines are defined for leaving the waste in the forest.</p> <p>The impact to environment at operational level related to waste in the forests is quite low. In state forest enterprises there is prevailing practice to check the cutting and other areas where the forest activities are foreseen before and after work by responsible persons and to ensure that no waste is disposed and that all legal requirements and good practice is followed. In addition, State Forest Service periodically controls how forest operations in cutting areas are being or have been implemented according to existing legal acts.</p> <p>The situation is similar in private forest. It is common practice that the contracts with forest felling companies include the requirement of cleaning the forest from the waste caused by the forest management work.</p> <p>The waste prevention problem exist in the forests nearby cities and recreational objects, which are often visited by people.</p> <p>The control of waste disposal is done by the Environmental Inspectorate. During the meeting with representatives of the Environmental Inspectorate that took place 29.09.2014 this topic was also discussed. They said that the waste is taken to forest illegally by people not related to forest operators and this is more critical in forests near bigger cities or recreation objects.</p>
Means of Verification	<ul style="list-style-type: none"> • Regional Best Management Practices • Supply contracts • Operational Assessment of potential impacts and of measures to minimise impact • Monitoring results.
Evidence Reviewed	<ul style="list-style-type: none"> • The Waste Act (Vastu võetud 28.01.2004 RT I 2004, 9, 52 jõustumine 01.05.2004) • Forest Act - (Metsaseadus. Vastu võetud 07.06.2006 RT I 2006, 30, 232, jõustumine 01.01.2007, osaliselt 01.07.2007) Chapter 1 - General provisions, 3 - Forest survey, chapter 4 - Forest management
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
2.3.1	Analysis shows that feedstock harvesting does not exceed the long-term production capacity of the forest, avoids significant negative impacts on forest productivity and ensures long-term economic viability. Harvest levels are justified by inventory and growth data.
Finding	Updated in 2021

	<p>The Forestry Development Plan 2012-2020 and Yearbook Forest 2013, that gives annual reports and facts about the forest in Estonia, state that during last decade the cutting rate in Estonian forests was from 7 to 11 million m³ per year. The amount is in line with sustainable development principle when the cutting rate doesn't exceed the annual increment and gives the potential to meet the long-term the economic, social and environmental needs. According to the Forestry Development Plan 2012-2020 the sustainable cutting rate is 12-15 million m³ per year.</p> <p>The Forestry Development Plan for 2021-2030 has not been agreed yet but based on the information from experts the felling rates will not be higher than in last development plan. Annual felling rates and annual growth comparison can be seen in Yearbook Forest statistics and in more descriptive way in Environmental Ministry web page https://www.envir.ee/et/metsastatistika.</p> <p>According to the Forest Yearbook 2019, the total volume of Estonian forests is 481,359,000 m³ (2019), annual growth 16,334,000m³ (2019) and estimated felling volume 11,300,000m³ (2019). This demonstrates that the annual growth is significantly higher than annual felling volume. Forest statistics from the Ministry of Environment homepage shows a similar trend for the period 2000-2019.</p> <p>The main planning document, where the assessment of inventory data and subsequent planning, implementation and monitoring are defined for forest owners, is the Forest Management Plan.</p> <p>Forest Management Plans are prepared for a period of ten years and include forest inventory analyses, monitoring results and the description of management impact of previous period. During the preparation process of new management plan all relevant data shall be collected and together with analyses of previous management cycle shall be fed back into new management planning and consequently into operation practice. Forest Management Plans are developed according to the Forest Act and related acts.</p> <p>A review of the statistics confirmed that annual harvest levels stay below annual yield and thus the low risk designation may be maintained.</p>
Means of Verification	<ul style="list-style-type: none"> Harvesting records, inventory and growth data and yield calculations, and Operational Practice indicate that biomass feedstock harvesting rates avoid significant negative impacts on forest productivity and long-term economic viability.
Evidence Reviewed	<ul style="list-style-type: none"> Forestry Development Plan 2012-2020 http://www.envir.ee/sites/default/files/elfinder/article_files/mak2020vastuvõetud.pdf Yearbook Forest 2013 http://www.keskkonnainfo.ee/main/index.php/et/component/content/article/184?tmpl=component Forest Act - (Metsaseadus. Vastu võetud 07.06.2006 RT I 2006, 30, 232, jõustumine 01.01.2007, osaliselt 01.07.2007) Chapter 1 - General provisions, 3 - Forest survey, chapter 4 - Forest management Forest Yearbook 2019 Forest statistics in Environmental Ministry web page https://www.envir.ee/et/metsastatistika .

Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
2.3.2	Adequate training is provided for all personnel, including employees and contractors (CPET S6d).
Finding	<p>In the Forest Development Plan 2012-2020 it is stated that: "There is evidence available (Forest Development Plan 2012-2020, Yearbook Forest 2013, article in magazine "Estonian Forest") that today there is enough number of qualified forest specialists working in forest sector in order to reach the main goals of forest development program and there is a need to continue to train new specialists and provide possibilities for specialists for additional training".</p> <p>The educational system in Estonia provides broad scope of education degree, training and scientific knowledge for forest sector. There is Estonian University of Life Sciences where it is possible to get forestry related higher education and Luua Forestry School and Pärnumaa Vocation Education Centre who provide forestry related vocation education. The information about the graduates is available in Yearbook Forest 2013.</p> <p>The need for forestry education also comes from the Forest Act.</p> <p>The state forest enterprises and private contractors are periodically controlled by State Labor Inspection, authorities of fire protection, Environmental Inspectorate and other controlling institutions if all workers have the necessary qualifications skills, corresponding documents and other necessary skills to fulfill the requirements of applicable legislation.</p>
Means of Verification	<ul style="list-style-type: none"> • Existing legislation; • Level of enforcement • Supply contracts; • Records of BP's field inspections; • Monitoring records; • Interview with Inspectorate • Training plans, training records, and records of qualifications.
Evidence Reviewed	<ul style="list-style-type: none"> • Forestry Development Plan 2012-2020 http://www.envir.ee/sites/default/files/elfinder/article_files/mak2020vastuvõetud.pdf • Yearbook Forest 2013 http://www.keskkonnainfo.ee/main/index.php/et/component/content/article/184?tmpl=component • Forest Act - (Metsaseadus. Vastu võetud 07.06.2006 RT I 2006, 30, 232, jõustamine 01.01.2007, osaliselt 01.07.2007) Chapter 1 - General provisions, 3 - Forest survey, chapter 4 - Forest management
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk

Comment or Mitigation Measure	
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	Indicator
2.3.3	<p>Analysis shows that feedstock harvesting and biomass production positively contribute to the local economy including employment.</p>
Finding	<p>It is common practice that the local workers are used for forestry works in Estonia. This fact has been proved in FSC audits in state forest and in private forests. Since state forest is managing half of the forests in Estonia and most of the job is done with the help of subcontractors who are private companies.</p> <p>In South Estonia there is possible that the Latvian subcontractors are used but this is not common practice.</p> <p>Most of the harvested round wood is processed inside Estonia. In 2013 2,7m m³ of unprocessed roundwood was exported from Estonia (24% of the annual felling rate in 2013) and 280 000 m³ was imported to Estonia. Exported round wood was mainly the pulpwood.</p> <p>Value added of forest sector companies at current prices in 2012 (last available statistics) was: 238m euro in Forestry, 341m euro in wood processing industry, 55m euro in paper and pulp industry and 108m in furniture industry. Full data about 2012 and previous years is available in Yearbook Forest 2013.</p>
Means of Verification	<ul style="list-style-type: none"> Analysis of contribution.
Evidence Reviewed	<ul style="list-style-type: none"> Yearbook Forest 2013 http://www.keskonnainfo.ee/main/index.php/et/component/content/article/184?tmpl=component
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
2.4.1	The health, vitality and other services provided by forest ecosystems are maintained or improved (CPET S7a).

Finding	<p>One of the main goals mentioned in Forestry Development Plan 2012-2020, Nature Conservation Act and in Forest Act (and in related documents) is the protection of biodiversity and maintenance of forest vitality. Measures to achieve this goal are: reforestation and afforestation based on ecological and genetically sound base, planting more mixed forests and especially the hardwood species, combining natural and artificial reforestation, formation of stable cost and river based forests, increase of assortment grown in forest nurseries, selection of valuable forest populations in every forest natural region, protecting their natural and genetically composition and rationally using their genetically resources for reproduction, reducing the use of chemical and replacing them by mechanical and biological means, etc. The analyses of forest vitality and health system provided in National Program on Environmental monitoring states that in Estonia the monitoring is being constantly carried out and the general vitality condition of Estonian forest, forest habitats and species is considered good.</p> <p>The Common system of sanitation protection covers state and private forests and deals with occasionally occurring natural calamities and diseases or pests outbreaks</p> <p>The forest management regulation defines the requirements and procedures for sanitation protection of state and private forests describing the necessary measures to prevent and eliminated reasons causing the damage to forests by biotic, abiotic and anthropogenic factors.</p>
Means of Verification	<ul style="list-style-type: none"> • Overall evaluation of potential impacts of operations on forest ecosystem health and vitality • Assessment of potential impacts at operational level and of measures to minimise impacts • Regional Best Management Practices • Supply contracts • Monitoring results.
Evidence Reviewed	<ul style="list-style-type: none"> • Forestry Development Plan 2012-2020 http://www.envir.ee/sites/default/files/elfinder/article_files/mak2020vastuvoetud.pdf • Forest management regulation (Metsa majandamise eeskiri Vastu võetud 27.12.2006 nr 88 RTL 2007, 2, 16, jõustumine 12.01.2007) All paragraphs. • Nature Conservation Act - (Looduskaitseeadus Vastu võetud 21.04.2004, RT I 2004, 38, 258, jõustumine 10.05.2004) Chapter 1 - general provisions, chapter 3 - Organisation of protection, chapter 4 - protected areas, chapter 5 - Limited-conservation areas, chapter 6 - Shores and Banks • National Program on Environmental monitoring http://seire.keskkonnainfo.ee/ • Forest Act - (Metsaseadus. Vastu võetud 07.06.2006 RT I 2006, 30, 232, jõustumine 01.01.2007, osaliselt 01.07.2007) Chapter 1 - General provisions, 3 - Forest survey, chapter 4 - Forest management
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator

2.4.2	Natural processes, such as fires, pests and diseases are managed appropriately (CPET S7b).
Finding	<p>The Forest Act and Fire Safety Act define the general requirements for establishment of anti-fire lines in forests as well as sets the procedures for organisation of fire extinguishing system in state and private forests.</p> <p>Estonian forests according to the burning class are divided into 3 categories (low, medium and high). Forest management of state and private forests are based on the forest management plans where the procedures and measures to verify that natural processes, fires, pests and diseases are managed appropriately are defined.</p> <p>In Estonia the fire prevention and monitoring system covers all Estonian forests. According to the Yearbook Forest 2013 there were 5 forest fires registered and all of these were caused by human activities (80% was caused by careless forest visitors). Statistics about previous years is also available in Yearbook Forest 2013.</p> <p>According to the legislation, forest fires must be put out. In some special cases (in purpose of imitating natural process) it is allowed to burn down forest stand but this is done in controlled conditions.</p> <p>Forest Act and related acts define the procedures, responsible institutions and measures for forest protection against pests, diseases and other natural calamities. Statistical data about forest sanitation conditions are available in the Yearbook Forest 2013. In addition, every forest management plan as the main planning documents includes the measures for forest protection against pests, diseases, natural calamities, etc. Preventive measures to be used by forest owners are as follows: monitoring and regular checkup and forecast of possible diseases and pests, the establishment of the damage layer for diseases and pests according to environmental impact assessment, operational, mechanical, chemical measures, the analyses of effectiveness of preventive measures, biological and chemical products, sanitation cuttings, trees for insect trap, quarantine, etc.</p>
Means of Verification	<ul style="list-style-type: none"> • Regional Best Management Practices; • Supply contracts; • Assessment of potential impacts at operational level and of measures to minimise impacts; • Monitoring results;
Evidence Reviewed	<ul style="list-style-type: none"> • Forest Act - (Metsaseadus. Vastu võetud 07.06.2006 RT I 2006, 30, 232, jõustumine 01.01.2007, osaliselt 01.07.2007) Chapter 1 - General provisions, 3 - Forest survey, chapter 4 - Forest management • Fire Safety Act (Tuleohutuse seadus, Vastu võetud 05.05.2010 • RT I 2010, 24, 116, jõustumine 01.09.2010) Chapter 2 – Ensuring fire safety • Yearbook Forest 2013 http://www.keskkonnainfo.ee/main/index.php/et/component/content/article/184?tmpl=component
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or	

Mitigation Measure	
	Indicator
2.4.3	<p>There is adequate protection of the forest from unauthorised activities, such as illegal logging, mining and encroachment (CPETS7c).</p>
Finding	<p>The legislation requires that all forest operations shall be planned and implemented in accordance with the requirements of the Forest Management Regulation. These include requirements for protection of nesting places of rare and endangered bird species, as well as requirements to leave trees and dead wood for biodiversity protection.</p> <p>The maintenance of buffer zones along water courses or open areas, as well as some limitation in relation to protection of soil against erosion is covered in the Regulations on forest cuttings.</p> <p>The Environmental Inspectorate is responsible for constantly controlling fulfillment of these laws. In case of timber theft it will be handled by police. The statistical data about different violations is available in Yearbook Forest 2013.</p> <p>According to the statistics provided by the Environmental Inspectorate statistics 938 sites were controlled during 2012 and 990 were controlled during 2013. The number of violations related to environmental requirements in 2012 was 22 and in 2013, 14.</p> <p>According to the data from Yearbook Forest 2013 there were 67 cases of timber theft, 12 persons were caught and the total damage was 80 433 euros.</p> <p>During the meeting with representatives of the Environmental Inspectorate that took place 29.09.2014 it was also concluded that the protection system is functioning well and there is no major risk in this area. The violations have been detected are small scale, for example: some soil damage or small scale cuttings in buffer zones. There is no major difference in compliance between the state forest and private forest. Where violations are detected in the state forest, the damage is rectified much more quickly.</p>
Means of Verification	<ul style="list-style-type: none"> • Maps; • Records of BP's field inspections; • Monitoring records; • Interviews with staff; • Publicly available information. • Request to Environmental Inspectorate • Interview with Environmental Inspectorate
Evidence Reviewed	<ul style="list-style-type: none"> • Forest Act - (Metsaseadus. Vastu võetud 07.06.2006 RT I 2006, 30, 232, jõustumine 01.01.2007, osaliselt 01.07.2007) Chapter 1 - General provisions, 3 - Forest survey, chapter 4 - Forest management • Nature Conservation Act - (Looduskaitseseadus Vastu võetud 21.04.2004, RT I 2004, 38, 258, jõustumine 10.05.2004) Chapter 1 - general provisions, chapter 3 - Organisation of protection, chapter 4 - protected areas, chapter 5 - Limited-conservation areas, chapter 6 - Shores and Banks, chapter 8 – Species

	<ul style="list-style-type: none"> • Yearbook Forest 2013 http://www.keskkonnainfo.ee/main/index.php/et/component/content/article/184?tmpl=component • Forest Management Regulation (Metsa majandamise eeskiri Vastu võetud 27.12.2006 nr 88 RTL 2007, 2, 16, jõustumine 12.01.2007) All paragraphs.
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
2.5.1	The legal, customary and traditional tenure and use rights of indigenous peoples and local communities related to the forest, are identified, documented and respected (CPET S9).
Finding	<p>There are no indigenous people in the country since Estonians are native in their homeland. However, there are national minorities (traditional communities) in Estonia – such as Russians, Finnish and other. Brief evaluation of various reports were done in order to confirm low risk for protection traditional people's rights. All reports states that Estonia has sufficient legislation for traditional rights protection.</p> <p>According to the legislation, people are allowed to be in private forest and in State Forest, pick berries and collect other non-timber products during the day time (except in strict nature reserves and during the nesting season of protected species). Where people would like to camp or make a fire in the forest, additional permission is needed from the land owner.</p> <p>In Estonia, there are no groups of individuals who have customary rights to forest harvesting activities.</p> <p>All the forest management plans are publicly available and interested persons can see these upon need. State Forest Management center has also harvesting plans uploaded on their homepage.</p> <p>The State Forests are FSC certified, therefore the managers have stated that they are willing to discuss customary rights related questions with stakeholders.</p>
Means of Verification	<ul style="list-style-type: none"> • Customary and traditional tenure and use rights are identified and documented; • Interviews with local communities and other stakeholders, indicate that their rights are respected; • Appropriate mechanisms to resolve disputes exist; • Agreements exist regarding these rights.
Evidence Reviewed	<ul style="list-style-type: none"> • Monitoring the EU Accession Process: Minority Protection • The Constitution of the Republic of Estonia Eesti Vabariigi põhiseadus. Vastu võetud 28.06.1992, RT 1992, 26, 349 (jõustumine 03.07.1992) Chapter 2 - Main rights, freedoms and responsibilities

	<ul style="list-style-type: none"> General Principles of the Law of the Environmental Code (Keskkonnaseadustiku üldosa seadus. Vastu võetud 16.02.2011, RT I, 28.02.2011, 1 jõustumine 01.08.2014, osaliselt 01.01.2015 ja 01.08.2017) Regulates "everymans right" and collects different relevant requirements from different laws. Chapter 4, part 2 - Right to use not owned land or water body. Forest Act - (Metsaseadus. Vastu võetud 07.06.2006 RT I 2006, 30, 232, jõustumine 01.01.2007, osaliselt 01.07.2007) Chapter 1 - General provisions, 3 - Forest survey, chapter 4 - Forest management Nature Conservation Act - (Looduskaitseeadus Vastu võetud 21.04.2004, RT I 2004, 38, 258, jõustumine 10.05.2004) Chapter 1 - general provisions, chapter 3 - Organisation of protection, chapter 4 - protected areas, chapter 5 - Limited-conservation areas, chapter 6 - Shores and Banks, chapter 8 – Species
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
2.5.2	Production of feedstock does not endanger food, water supply or subsistence means of communities, where the use of this specific feedstock or water is essential for the fulfilment of basic needs.
Finding	Main necessities of local communities are related to recreation and mushroom and berries picking. These activities are important for many people for leisure or perquisite income. The right to get free access to the forests are guaranteed in the Constitution of Republic of Estonia, Forests Law and other legal acts. With few exceptions all forests are available for berries and mushroom picking. Exceptions include only the nature reserves and berry plantations in the forests. The right to get free access to the forests are guaranteed in the Constitution of Republic of Estonia, Forests Act and General Principles of the Law of the Environmental Code. Forest management does not play significant role in relation to community necessities, because the Estonian forest cover is more than 50% and various succession stage forests are available in the landscape, therefore no risk related to this indicator exist. It is prevailing practice that state forest enterprises allow the local people to collect the cutting residues from cutting areas. In addition, local people can buy fuel wood without any restrictions. The market analyses indicates that there is not lack of fuel wood for local people and that forest operation doesn't cause and influence the lack of basic needs of local people.
Means of Verification	<ul style="list-style-type: none"> Interviews with local communities and other stakeholders indicate that subsistence needs are not endangered. Agreements exists on resource rights where these impact on the needs of communities.
Evidence Reviewed	<ul style="list-style-type: none"> The Constitution of the Republic of Estonia Eesti Vabariigi põhiseadus. Vastu võetud 28.06.1992, RT 1992, 26, 349 jõustumine 03.07.1992) Chapter 2 - Main rights, freedoms and responsibilities

	<ul style="list-style-type: none"> General Principles of the Law of the Environmental Code (Keskkonnaseadustiku üldosa seadus. Vastu võetud 16.02.2011, RT I, 28.02.2011, 1 jõustumine 01.08.2014, osaliselt 01.01.2015 ja 01.08.2017) Regulates "everymans right" and collects different relevant requirements from different laws. Chapter 4, part 2 - Right to use not owned land or water body
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
2.6.1	Appropriate mechanisms are in place for resolving grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions.
Finding	<p>Grievances and disputes, including those relating to tenure and use rights, to forest management practices and to work conditions are regulated by basic legislation, namely: Constitution, Law of Obligations Act , Labour Code etc. The detailed procedures, duties and responsibilities of involved persons are defined in the basic legislation. In Estonia, the land restitution process is still ongoing, therefore most cases of grievances and disputes are related to establishment of tenure and use rights over forests under restitution process and disputes over borders of forests.</p> <p>In case people are not satisfied with the results of dispute there is always possibility to turn to court of justice.</p> <p>In addition, state forest enterprises have their own procedures, which regulates the registration, investigation and the application of relevant actions in order to solve the disputes with private persons and local communities.</p> <p>The disputes related to work conditions shall be solve according to administrative procedures and labour legislation. It is prevailing practice to include additional clarification statements in the working agreements concerning the dispute resolutions. In addition, the trade unions can assist in solving disputes over working conditions and can use their own procedures and agreements.</p>
Means of Verification	<ul style="list-style-type: none"> Existing legislation; Level of enforcement; Regional Best Management Practices; Supply contracts; Records of BP's field inspections; Monitoring records;
Evidence Reviewed	<ul style="list-style-type: none"> The Constitution of the Republic of Estonia (Eesti Vabariigi põhiseadus. Vastu võetud 28.06.1992 RT 1992, 26, 349 jõustumine 03.07.1992) Law of Obligations Act (Võlaõigusseadus. Vastu võetud 26.09.2001 RT I 2001, 81, 487 jõustumine 01.07.2002)

	<ul style="list-style-type: none">Forest Act - (Metsaseadus. Vastu võetud 07.06.2006 RT I 2006, 30, 232, jõustumine 01.01.2007, osaliselt 01.07.2007) Chapter 1 - General provisions, 3 - Forest survey, chapter 4 - Forest management
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
2.7.1	Freedom of Association and the effective recognition of the right to collective bargaining are respected.
Finding	<p>There are Employment Contracts Act, Trade Unions Act and The Constitution of the Republic of Estonia regulating that Freedom of Association and effective recognition of the right to collective bargaining.</p> <p>The Estonian Trade Union Confederation (EAKL) comprises of 20 branch unions that represent state and municipal government officials, education workers, health care workers, transport workers (including road, railway, sea and air transport), industrial workers (including energy, light industry, food industry, timber and metal industry) and people employed in the service sector (postal, communication, trade, hotel and cleaning sector workers, etc). The EAKL operates to ensure that the principle of social justice is respected in society. The EAKL represents employees' interests in collective agreements and protects employees' rights in employment relations, consults employers on developing a sustainable labour market and the government on developing a socially sustainable economic model. The EAKL participates actively in the formation of legislation and policies in order to guarantee the social security of employees and a healthy working environment.</p> <p>§ 29 of Estonian Constitution establishes the workers are free to form and join trade unions and the workers right to strike for protecting their economic and social interests. According to the Trade Unions Act, Trade Unions have the right to supervise the employer's adherence to and implementation of the labour, economic, and social laws related to the rights and interests of their members, as well as of the collective and other agreements. It is also Right of Trade Unions to Demand the Annulment of the Employer's Decisions which violate labour, economic, and social rights of their members provided by the laws of the Republic of Estonia.</p>
Means of Verification	<ul style="list-style-type: none"> • Existing legislation; • Level of enforcement; • Supply contracts; • Records of BP's field inspections; • Assessment at an operational level of measures designed to minimise impacts on the values identified; • Monitoring records;
Evidence Reviewed	<ul style="list-style-type: none"> • Employment Contracts Act (Töölepingu seadus) • Vastu võetud 17.12.2008, RT I 2009, 5, 35, jõustumine, 01.07.2009) All chapters • Trade Unions Act (Ametiühingute seadus. Vastu võetud 14.06.2000, RT I 2000, 57, 372 jõustumine 23.07.2000) Chapter 1 - General provisions • ILO conventions (relevant sections for legal employment have been incorporated into Estonian Legislation by the Employment Contracts Act and the Trade Unions Act). • The Estonian Trade Union Confederation (EAKL) http://www.eakl.ee/

	<ul style="list-style-type: none"> The Constitution of the Republic of Estonia (Eesti Vabariigi põhiseadus. Vastu võetud 28.06.1992, RT 1992, 26, 349 jõustumine 03.07.1992) Chapter 2 - Main rights, freedoms and responsibilities ILO Convention site: http://www.ilo.org/
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
2.7.2	Feedstock is not supplied using any form of compulsory labour.
Finding	According to the Constitution of the Republic of Estonia § 29 forced labour is prohibited. Estonia has ratified ILO Convention concerning Forced or Compulsory Labour No I-507. Ministry of Social Affairs is responsible for implementing this convention and taking all measures to avoid forced or compulsory labour in the country. Exploring the situation of compulsory and/or forced labour in Estonia some nongovernmental researches have been analysed but no major evidences were identified regarding compulsory and/or forced labour in the country.
Means of Verification	<ul style="list-style-type: none"> Existing legislation; Level of enforcement; Supply contracts; Records of BP's field inspections; Monitoring records;
Evidence Reviewed	<ul style="list-style-type: none"> ILO conventions (relevant sections for legal employment have been incorporated into Estonian Legislation by the Employment Contracts Act and the Trade Unions Act). The Constitution of the Republic of Estonia (Eesti Vabariigi põhiseadus. Vastu võetud 28.06.1992, RT 1992, 26, 349 jõustumine 03.07.1992) Chapter 2 - Main rights, freedoms and responsibilities
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
2.7.3	Feedstock is not supplied using child labour.

Finding	The terms and conditions of employment underage workers is regulated in Employment Contracts Act. There are very strict rules for the types of job and the duration of the job that children under the age of 18 are allowed to do. Existing information about child labour in the reports of acting institutions were reviewed. There were no evidences of child labour identified after reports analyses. The Ministry of Social Affairs is responsible for managing the protection of children rights. The child of 14 years and above shall have the right to work commensurate with his age, state of health, general education level and professional expertise if the child is less than 14 years old employer must ask special permission from the local work inspector. Work shall be chosen freely. In 1992, Estonia has ratified UN Convention on the Rights of the Child. Ministry of Social Affairs is responsible for implementing this convention and taking all measures to protect the rights of the children.
Means of Verification	<ul style="list-style-type: none"> • Existing legislation; • Level of enforcement; • Supply contracts; • Records of BP's field inspections; • Assessment at an operational level of measures designed to minimise impacts on the values identified; • Monitoring records; • Public Information
Evidence Reviewed	<ul style="list-style-type: none"> • ILO conventions (relevant sections for legal employment have been incorporated into Estonian Legislation by the Employment Contracts Act and the Trade Unions Act). • The Constitution of the Republic of Estonia (Eesti Vabariigi põhiseadus. Vastu võetud 28.06.1992, RT 1992, 26, 349 jõustumine 03.07.1992) Chapter 2 - Main rights, freedoms and responsibilities • Employment Contracts Act (Töölepingu seadus • Vastu võetud 17.12.2008, RT I 2009, 5, 35, jõustumine, 01.07.2009) All chapters • ILO conventions (relevant sections have been incorporated into Estonian Legislation by the Employment Contracts Act and the Trade Unions Act).
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
2.7.4	Feedstock is not supplied using labour which is discriminated against in respect of employment and occupation.
Finding	Estonia has ratified ILO convention number 111 in 2005, number 100 in 1996 and relevant sections have been incorporated into Estonian Legislation by the Employment Contracts Act and the Trade Unions Act.

Means of Verification	<ul style="list-style-type: none"> Existing legislation; Level of enforcement; Supply contracts; Records of BP's field inspections; Monitoring records; Payroll records; Company policies indicate that the requirements are met.
Evidence Reviewed	<ul style="list-style-type: none"> ILO conventions (relevant sections have been incorporated into Estonian Legislation by the Employment Contracts Act and the Trade Unions Act).
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
2.7.5	Feedstock is supplied using labour where the pay and employment conditions are fair and meet, or exceed, minimum requirements.
Finding	<p>Legal employment in Estonia is defined by different legislation. According to the legislation all employees shall have signed employment contract which is a basis for obligatory social security. According to the requirements of the Employment Contracts Act, the employment contract must be in writing and it must contain essential provisions in order to be valid, such as conditions of payment, the place of work and a job description. Certain types of employment contract may require additional provisions such as the term of the contract, seasonal work, etc. Temporary hires, provided through employment agencies, offer an alternative to fixed term contracts.</p> <p>Illegal employment in Estonia is controlled and preventive measures implemented by different institutions such as State Labour Inspectorate, Estonian Tax and Customs Board and Police Department.</p> <p>Minimum wage shall be define by the Government. According to the Minimum Wage Act the minim wage from 01.01.2015 is 2,34 EUR per hour and 390 EUR per month in case of full work time.</p>
Means of Verification	<ul style="list-style-type: none"> Existing legislation; Level of enforcement; Supply contracts; Records of BP's field inspections; Monitoring records;
Evidence Reviewed	<ul style="list-style-type: none"> Employment Contracts Act (Töölepingu seadus Vastu võetud 17.12.2008, RT I 2009, 5, 35, jõustumine, 01.07.2009) All chapters Minimum Wage Act (Töötasu alammäära kehtestamine. Vastu võetud 28.11.2013 nr 166). All chapters.

Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
2.8.1	<p>Appropriate safeguards are put in place to protect the health and safety of forest workers (CPET S12).</p>
Finding	<p>Updated in 2021</p> <p>Health and safety in forestry activities is monitored by the Labour Inspectorate. The Occupational Health and Safety Act provides the occupational health and safety requirements set for work performed by employees and officials (hereinafter employee), the rights and obligations of an employer and an employee in creating and ensuring a working environment which is safe for health, the organisation of occupational health and safety in enterprises and at state level, the procedure for challenge proceedings, and the liability for violation of the occupational health and safety requirement.</p> <p>According to the Labour Inspectorate's statistics, they have visited a total of 82 forestry related companies during 2012 and 75 companies during 2013. The total number of violations in 2012 was 299 and in 2013 was 209.</p> <p>The main type of violations were related to <u>health and safety procedures</u>, for example, risk assessments were missing or were not according to requirements, no internal controls in place, a lack of safety instructions for machinery, insufficient training for workers and violations of health control requirements.</p> <p>Safety equipment related violations make up 8% of the total violations during the past five years.</p> <p>During the FSC FM audits there have also been some cases where workers were not wearing the required safety equipment though the equipment was provided by the employer. There are very rare cases of violations among FSC certified companies since they are controlled every year during audits and FSC requires more than the local legislation.</p> <p>According to the information from Forestry Workers Union the violation of health and safety requirements is not widespread among their members and compared to previous years the situation is much better. Using health and safety equipment has become a natural element among their members. Members of the union are State Forest workers only.</p> <p>It is clear that issues exist in some areas, but according to the statistics, the majority of forestry workers are using the required safety equipment and in most of the cases the required equipment has been provided to workers.</p>

	<p>We received some additional information during the stakeholder consultation from the Estonian Forest and Wood Industries Association. According to their studies, 96% of fellings are conducted by harvester, and machine operators are working in good working environment.</p> <p>At the same time we received some statistics from the Police about the fatalities related to self-employed persons (they are not controlled by Labour Inspectorate and such accidents are not reflected in their statistics). There are on average one to three fatalities per year related to felling activities. This shows that there is some risk related to felling activities. On the other hand the volume that is cut down by chainsaw operators is very small when compared to the total volume. Moreover, the fact that Environmental Inspectorate together with Labour Inspectorate have conducted additional inspections to control the fulfillment of the new act that requires the registration of all workers, makes it possible to change the risk status from specified to low risk.</p> <p>Ongoing control visits are also conducted by the Labour Inspectorate, which helps in improving the gaps that have been identified.</p> <p>According to latest statistics from Labor Inspectorate (https://www.ti.ee/et/statistika/tooonnetused) there were 30 accidents in 2017, 29 (13 serious accidents) in 2018, 27 in 2019 (six serious ones) and 27 in 2020 (nine serious ones).</p> <p>These statistics reflect the forest management level.</p> <p>Based on the latest statistics there is no need to change risk level in this indicator.</p>
Means of Verification	<ul style="list-style-type: none"> • Existing legislation; • Level of enforcement; • Supply contracts; • Records of BP's field inspections; • Monitoring records; • Feedback from Labour Inspectorate
Evidence Reviewed	<ul style="list-style-type: none"> • Occupational Health and Safety Act (Töötervishoiu ja tööhutuse seadus. Vastu võetud 16.06.1999, RT I 1999, 60, 616, jõustumine 26.07.1999) All chapters. • ILO conventions (relevant sections for health and safety have been incorporated into Estonian Legislation by the Occupational Health and Safety Act). • Answer to NEPCons request by Labour inspectorate (answer sent to NEPCon on 06.04.2014) • Answer from Police and Customs Board (2.1-3/9891-1 31.03.2015) • Answer to NEPCons request by Labour inspectorate (answer sent to NEPCon on 26.03.2015) • Labor Inspectorate statistics (https://www.ti.ee/et/statistika/tooonnetused)
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
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.
Finding	<p>Updated in 2021</p> <p>The high carbon stocks are considered to be in wetlands, peat lands and very old mature forests stands. The Forest Act and Nature Conservation Act state that according to the management purpose Estonian forests are divided into four groups (forest reserves, special-purpose forests, protective forests, exploitative forests). The wetlands, peatlands and very old mature forests which contain the high carbon value mostly have strict protection regime enforced by the legislation. Bordering areas around the wetland usually have strict protection regime or can also be protective forests where some minor management is allowed. Usually sanitary cutting, thinning or shelter wood felling is implemented.</p> <p>All information about the protected areas is available in the public Forest Registry, EELIS database. Protection rules for all protected areas are available in Riigiteataja database (place where all Estonian Acts are saved). According to EELIS database (www.EELIS.ee) there are following protection areas in Estonia (31 December 2020):</p> <p>Six national parks, 231 nature conservation areas, 156 landscape conservation areas, 319 conservation areas (hoiuala), 1633 special species protection areas (püselupaik), 38 conservation areas with old protection regime, 22 protection objects under local municipality protection, over 1076 single protection objects, 22 single protection objects on local municipality level, 471 protected parks and forest stands.</p> <p>There are 14.1% of strictly protected forests (no management activities allowed) and 11.3 % of forest area of limited management zones (2019 data). So, 25.4% of forest land is under some kind of protection regime.</p> <p>All of them are managed under the applicable legislation (protection plan, management plan etc) or free of any activities at all. Currently there is no evidence that remaining important large scale forests are impacted by forestry practices. The forest operations shall be planned and implemented following requirements set up in the Forest Management Regulation. In the mentioned Act various bans to extract biomass in order to protect ecosystems are clearly defined.</p> <p>Most of the drainage systems existing on wetlands and peat lands are established during the soviet occupation and before 2008. More valuable areas are protected by the state as mentioned above. The risk of wetland depletion through expanding drainage systems is regulated and only maintenance and restoration of existing systems is allowed. New systems require an environmental impact assessment before a permit is considered. This is regulated by the Land Improvement Act.</p> <p>It is important to highlight that the SBP Standard does not restrict sourcing feedstock for biomass production from wetlands or peatlands. In a guidance note to the indicator 2.9.1 in Standard 1 it is explained that drainage shall not be conducted on previously undrained soils (renovation of old Soviet-time drainage systems using modern</p>

	<p>engineering methods is acceptable) and this is being followed in practice. No previously undrained soils are being drained.</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 may be true that harvesting activities and drainage restoration 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>Additionally, only in 2020 over 6000 ha of wetlands were restored. Over last 5 years over 12 000 ha of wetlands were restored in Estonia. More projects are being planned. This indicates a positive trend. Main driver of these projects is state forest and experts from universities and NGOs are involved in these projects as well.</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 in early 2022. 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>
Means of Verification	<ul style="list-style-type: none"> • Maps, procedures and records • Regional, publicly available data from a credible third party • The existence of a strong legal framework in the region • Interviews with experts
Evidence Reviewed	<ul style="list-style-type: none"> • Nature Conservation Act - (Looduskaitseeadus Vastu võetud 21.04.2004, RT I 2004, 38, 258, jõustumine 10.05.2004) Chapter 1 - general provisions, chapter 3 - Organisation of protection, chapter 4 - protected areas, chapter 5 - Limited-conservation areas, chapter 6 - Shores and Banks, chapter 8 – Species • Forest Act - (Metsaseadus. Vastu võetud 07.06.2006 RT I 2006, 30, 232, jõustumine 01.01.2007, osaliselt 01.07.2007) Chapter 1 - General provisions, 3 - Forest survey, chapter 4 - Forest management • Yearbook Forest 2019 https://www.keskkonnaagentuur.ee/et/aastaraamat-mets-2019 • Land Improvement Act https://www.riigiteataja.ee/en/eli/527122018003/consolidate • Riigiteataja – Database for all Acts in Estonia www.riigiteataja.ee • Forest management regulation (Metsa majandamise eeskiri Vastu võetud 27.12.2006 nr 88 RTL 2007, 2, 16, jõustumine 12.01.2007) All paragraphs. • Wetland restoration https://www.rmk.ee/metsa-majandamine/loodusblogi/soode-taastamine-2020
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
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.
Finding	<p>Updated in 2021</p> <p>Forest inventory data in Estonia has been available since 1958 and forest statistics including forest land use change, forest coverage, forest conversion and other related information is available in the Forest Yearbook 2019. The monitoring data and forest inventory indicates that the total forest coverage is increasing, the cutting rate is lower than the forest increment and the structure of forest stand according to forest site does not show the increase of poor forest stands.</p> <p>According to the Forest Yearbook 2019, the total volume of Estonian forests is 481,359,000 m³ (2019), annual growth 16,334,000m³ (2019) and estimated felling volume 11,300,000m³ (2019). This demonstrates that the annual growth is significantly higher than annual felling volume. Forest statistics from the Ministry of Environment homepage shows a similar trend for the period 2000-2019.</p> <p>In 2020, a report "Forest and Climate Change" was published in cooperation between the Estonian Ministry of the Environment and the University of Cambridge. This is one of the three comprehensive reports which were analysed on this topic and it gives the following conclusions:</p> <ul style="list-style-type: none"> • A forest is a very complex system with many variables (including climate change) impacts and their interrelationships are diverse. The future of the Estonian forest was modelled into five scenarios for the next hundred years. The four of them differ from each other mainly in terms of the volume of regeneration felling and the fifth is where no felling takes place. • Based on the observed scenarios, the recommended volume of regeneration felling for the next one hundred years is 8-9 million m³ on average per year, the total annual felling volume is about 10-12 million cubic metres per year. During the five-year duration of the previous RRA the average annual harvest rate was below 12 million cubic metres and therefore within the sustainable range. • If the annual felling volumes specified in a previous point are maintained, the forest reserve should remain either the same or increase depending on the forest growth scenario. And so it ensures the carbon sequestration and additional storage in the forest from year to year. It is important to follow the principles of sustainable forest management and allow regeneration felling only in stands that have reached legal felling age. • 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 emitter in the coming decades. Still, around 2040 is forest carbon sequestration and emissions would become neutral and from 2050 onwards more carbon would be sequestered in the maturity felling scenario than in the uniform felling scenario. Nevertheless, the "mature felling scenario" has never been practised and is not expected in the future.

	<ul style="list-style-type: none"> The forest felling of up to 10-12 million cubic metres per year is thus recommended. When talking about forest carbon emissions, it is important to remember that not all timber volumes are immediately released as CO₂ into the atmosphere. At least half of felled timber is stored into the Harvested Wood Products (HWP). It is estimated that the life cycle for sawn timber is 35 years, fibre boards 25 years and paper products two years. The report gives a positive evaluation to using woody biomass and timber products to replace fossil fuels and fossil-intense materials. <p>Additionally, two most recent National Inventory Reports (NIR) were analysed: Report pursuant to Articles 13 and 14 of Regulation (EU) 525/2013 Estonia (2019) and Report pursuant to Article 39 of Regulation (EU) 2018/1999 Estonia (2020), both published by Ministry of the Environment.</p> <p>The 2019 NIR states that the LULUCF sector is expected to start to release carbon according to the projections until 2040. However, it is mainly caused by the increased emissions from croplands to cover growing food demand. Expanding settlements area will also increase the emissions from Settlements. In coming years forest growing stock reaches the peak and then begins to decrease. Therefore, it is also expected that CO₂ sequestration from forest land is going to decline.</p> <p>The 2020 NIR provides more recent assessment and it states that according to the projections, the LULUCF sector is expected to become a source of GHGs from 2031 onwards. Forest land and HWP will continue to sequester carbon, however in other categories, emissions occur throughout the period. Despite the moderate decline in fellings rate, net annual increment in 2018 and 2019 has been lower than in previous years. The age structure of managed forests in Estonia is dominated by mature stands as approximately 39% of forest stands are more than 60 years old. Due to the high proportion of mature forests, management is needed to increase the carbon sequestration capacity. Although carbon sequestration will temporarily decrease in the coming years, it will increase in the long run. It is expected, that in 2031–2040 the CO₂ sequestration from forest land is going to decline to -1,277.8 kt CO₂ eq, due to the increasing share of very young and old stands where sequestration rate is lower. In 2041–2050, net removal from forest land will increase and reach -1,912.9 kt CO₂ eq.</p> <p>A report “Hidden inside a wood pellet” (2020) published by Estonian Fund for Nature and the Latvian Ornithological Society was also reviewed. This report raised some concerns about a potential decrease in forest carbon sink projected in a NIR report from 2019. However, as described above, a more recent report from 2020 states that although carbon sequestration may temporarily decrease in the coming years, it will increase in the long run.</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). The report provides additional assurance that if current forest harvest levels will be maintained (highly likely) then there is no risk to forest carbon stock and sink in the long term.</p> <p>Based on the described analysis the risk for this indicator over the long term is evaluated as low.</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</p>
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	<p>shortly after. Special attention will be given to the topic of forest carbon and the situation reviewed again then.</p>
Means of Verification	<ul style="list-style-type: none"> Results of analysis Regional, publicly available data from a credible third party The existence of a strong legal framework in the region for forest regeneration including limitation for the species to be used during planting. Interviews with experts
Evidence Reviewed	<ul style="list-style-type: none"> Yearbook Forest 2019 https://www.keskkonnaagentuur.ee/et/aastaraamat-mets-2019 Forest Statistics from Ministry of Environment website https://www.envir.ee/et/metsastatistika „Forest and Climate Change“ (2020) https://www.envir.ee/sites/default/files/metsad_ja_kliima_muutused_v3.0_eesti_keelne.pdf Report pursuant to Articles 13 and 14 of Regulation (EU) 525/2013 Estonia https://www.envir.ee/sites/default/files/content-editors/Kliima/kasvuhoonegaaside_politiikaid_meetmeid_ja_prognoose_kasitlev_aruanne_15.03.2019.pdf Report pursuant to Article 39 of Regulation (EU) 2018/1999 Estonia https://www.envir.ee/sites/default/files/Kliima/ghg_projections_pams_estonia_2021_15.03.21_3.pdf Hidden inside a wood pellet https://media.voog.com/0000/0037/1265/files/Biomass_report_ENG%20_2020.pdf LULUCF sector carbon sink analysis till 2050 (Maakasutuse, maakasutuse muutuse ja metsanduse sektori sidumisvõimekuse analüüs kuni aastani 2050) (https://envir.ee/media/4036/download)
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

	Indicator
2.10.1	Genetically modified trees are not used.
Finding	<p>According to the information available, GMO-s is not used in Estonia.</p> <p>The European Union Council Directive 1999/105/EC on the marketing of forest reproductive material regulates the marketing and production for marketing purposes of forest reproductive material within the Community. The directive prohibits placing genetically modified forest reproductive material on the market, unless it is safe for human health and the environment. There is a number of requirements included in the directive, including a risk assessment that must be fulfilled prior to placing any GMO on the European market.</p>

	<p>There is also an overall law - The Act of Taking GMO-s to nature (Geneetiliselt muundatud organismide keskkonda viimise seadus) that applies to all types of organisms including forest regeneration material. There are rules and conditions for taking GMO-s to environment. However, the Estonian Forestry Act eliminates the chance for using GMO-s for forest regeneration since no GMO-s are included in the list of appropriate regeneration material.</p> <p>The forest selection project manager Tiit Maaten from Estonian University of Life Sciences also shared his opinion that at the moment there are no such GMO tree species developed that would be suitable for the Estonian climate and at the same time be safe for environment. In his opinion, it is unrealistic that the GMO-s will be used for forest generation in Estonia.</p> <p>According to Environmental Inspectorate and other public sources there are no permissions given for using GMO-s in Estonian Forests.</p>
Means of Verification	<ul style="list-style-type: none"> • Reference sources, interviews and records show that GMOs are not used. • Public reports • Legislation
Evidence Reviewed	<ul style="list-style-type: none"> • The regions for forest regeneration material allowed to use in Estonia (Eestis metsa kultiveerimisel kasutada lubatud kultiveerimismaterjali algmaterjali päritolupiirkonnad) https://www.riigiteataja.ee/akt/115042011002 • Categories of regeneration material and quality requirements for the regeneration material. (Kultiveerimismaterjali kategooriad, kultiveerimismaterjali algmaterjalile ning kultiveerimismaterjali kvaliteedile esitatavad nõuded) https://www.riigiteataja.ee/akt/1048227?leiaKehtiv • The Act for taking GMO-s to Environment (Geneetiliselt muundatud organismide keskkonda viimise seadus) https://www.riigiteataja.ee/akt/108072014010?leiaKehtiv • EU Directive 1999/105/EÜ 22. december 1999, about marketing of forest regeneration material (NÕUKOGU DIREKTIIV 1999/105/EÜ, 22. detsember 1999, metsapaljundusmaterjali turustamise kohta)
Risk Rating	<input checked="" type="checkbox"/> Low risk <input type="checkbox"/> Specified risk
Comment or Mitigation Measure	

Annex 2: List of experts consulted and contacts of Working Body

Expert	Qualification	Role
Aavo Sempelson	Senior inspector in Environmental Inspectorate, Nature conservation department	Consulted areas related to Nature conservation and fulfillment of requirements in Forest Act Consulted also in 2021
Uno Luht	Manager of Nature conservation department in Environmental Inspectorate	Consulted areas related to Nature conservation and fulfillment of requirements in Forest Act
Hardi Tullus	Professor in Estonian University of Life Sciences, Department of Silviculture	Consulted indicators related to carbon balances
Tiit Maaten	Forest selection project manager in Estonian University of Life Sciences	Consulted GMO related indicators
Airi Lepassar	Manager of VII control department in Estonian Tax and Customs Boards	Consulted tax related questions
Annika Lepp	Senior specialist in Estonian Tax and Customs Boards	Consulted tax related questions
Kadri Alas	Specialist in Ministry of the Environment, Nature Conservation Department	Consulted indicators related to CITES
Eve Sepp	Forestry Workers Union	Consulted indicators related to H&S
Krista Vaikmets	Analyst in Work Inspectorate	Consulted indicators related to H&S
Urmas Tamm	Chief specialist of Forest registry in Environmental Agency	Consulted indicators related to WKH
Kristel Järve	Chief specialist in Forest department of Ministry of Environment	Consulted indicators related to WKH

Working Body: Preferred by Nature, coordinator: Asko Lust alust@preferredbynature.org, phone: +372 5565 3894

Annex 3: List of publications used

Yearbook Forest 2013. Available: <http://www.keskkonnainfo.ee/main/index.php/et/vaeljaanded-ja-uelevaated/vaeljaanded-ja-uelevaated>

Presentation "PREPARATIONS FOR IMPLEMENTATION IN ESTONIA" Alar Soo

Nature Conservation Department Friday 8th February 2013, Head of Department - <http://www.illegal-logging.info/sites/default/files/uploads/AlarSoo080213.pdf> EUTR

[Data on State ambient air monitoring](#) ([Keskkonnaagentuur](#))

Forestry Development Plan 2012-2020

http://www.envir.ee/sites/default/files/elfinder/article_files/mak2020vastuvõetud.pdf

[Yearbook forest 2019 Available: https://www.keskkonnaagentuur.ee/et/aastaraamat-mets-2019](#)

[Forestry statistics from Environmental Ministry: https://www.envir.ee/et/metsastatistika](#)

[Work accidents statistics from Labour inspectorates homepage:](#)

<https://www.ti.ee/et/statistika/tooonnetused>

[FSC CNRA: https://fsc.org/en/document-centre/documents/resource/309](#)

„Forest and Climate Change“ (2020)

https://www.envir.ee/sites/default/files/metsad_ja_kliima_muutused_v3.0_eesti_keelne.pdf

Report pursuant to Articles 13 and 14 of Regulation (EU) 525/2013 Estonia

https://www.envir.ee/sites/default/files/content-editors/Kliima/kasvuhoonegaaside_poliitikaid_meetmeid_ja_prognoose_kasitlev_aruanne_15.03.2019.pdf

Report pursuant to Article 39 of Regulation (EU) 2018/1999 Estonia

https://www.envir.ee/sites/default/files/Kliima/ghg_projections_pams_estonia_2021_15.03.21_3.pdf

Hidden inside a wood pellet https://media.voog.com/0000/0037/1265/files/Biomass_report_ENG%20_2020.pdf

LULUCF sector carbon sink analysis till 2050 (Maakasutuse, maakasutuse muutuse ja metsanduse sektori sidumisvõimekuse analüüs kuni aastani 2050), (2021) published in cooperation with Environmental Agency and Estonian University of Life Sciences.

(<https://envir.ee/media/4036/download>)

Annex 4: List of stakeholders

- **Estonian Biomass Association (EBA)** - is a nonprofit organisation, which was founded in Tallinn on May 8, 1998. EBA is a voluntary union of its members. EBA is engaged in renewable fuels research, resources estimation, sustainable development of renewable types of energy and promotion of the use of environmentally-friendly fuels at both the state and individual level. Contact: eby@eby.ee, phone: +372 55 32910
- **Baltic Biomass Network (BBN)** - The BSR INTERREG IIIB Baltic Biomass Network works at a regional, spatial planning level with local authorities, biomass producers and bioenergy investors in drawing up optimal GIS based biomass production schemes for mobilising biomass resources and planning sustainable bioenergy investment projects.

Contact:

- **Estonian Renewable Energy Association** - Estonian Renewable Energy Association was established on May 13, 2011 in Estonia. The association is founded by the main renewable energy producers in Estonia and associations from different renewable energy sectors such as biogas, biomass, hydro, solar and wind. Estonian Renewable Energy Association covers all renewable energy sectors in Estonia, including electricity, heating and cooling and biomass. Contact: koda@taastuvenergeetika.ee, phone: +372 56 490 670
- **Estonian Council of Environmental NGOs** - nine non-governmental environmental organisations belong to the council. Until now EKO members have made joint efforts mainly to make Estonian forestry, agriculture, and energy policies and planning decisions more environmentally friendly. Contact: Kai Klein, info@eko.org.ee, phone: +372 53338572
- **Estonian Fund for Nature** - Since 1991, the voluntary civic association in cooperation with many people and organisations has been the leader of various wildlife conservation projects important to Estonia. Contact: elf@elfond.ee, phone: +372 7428443
- **SEI Tallin** - is a part of Stockholm Environment Institute. The Tallinn centre is a key national expert on environment and energy, sustainable development and number of policy issues in the Estonian society. SEI Tallinn's agenda is driven by local, European as well as global challenges in sustainable development. Contact: info@seit.ee, phone: +372 6276101

Estonian Green Movement / Friends of the Earth (ERL) - is a non-profit environmental organisation. It has founded in 1988, becoming one of the first environmental NGOs in Estonia that started to deal with

wide range of environment and development issues. ERL is one of the most influential environmental groups in Estonia, raising environmental awareness among public, pushing government for strong policy and being quite visible in national media. Its activities are carried out in framework of 3 programs, which are Environmental awareness, Environmental policy and Nature conservation. Contact: info@roheline.ee, phone: +372 742 2532

- **The Estonian Private Forest Union (EPFU)** - was established in 1992 as an umbrella organisation for the local organisations of private forest owners. The EPFU has approximately 30 member organisations all over Estonia. Local organisations can be set up from forest owners of both natural and legal persons. The main purpose of the EPFU is to represent the interests of private forest owners. This means active participation in Estonian forest policy and legislative process. In order to create a strong representative body it is important to cooperate with forest owners and give them a possibility to express clearly their position as far as their rights are concerned. The EPFU can be considered as a mediator in forest issues between the state and the third sector. Contact: erametsaliit@erametsaliit.ee, phone: +372 6525888
- **The Foundation Private Forest Centre (PFC)** - was established on March 23, 1999. The Private Forest Centre ensures meeting of the responsibilities of the state towards private forest owners. The main objective of the PFC is to contribute to sustainable, environmentally friendly and efficient forest management practice of Estonian private forest owners. It thus cooperates closely with state institutions and local private forest owners organisations and is governed by representatives of private forests as well as civil servants. Contact: eramets@eramets.ee, phone: +372 6525333
- **Estonian University of Life Sciences (EMU)** – the only [university](#) in Estonia whose priorities in academic and research activities provide the [sustainable development](#) of natural resources necessary for the existence of Man as well as the preservation of heritage and [habitat](#). The EMU is a centre of research and development in such fields as [agriculture](#), [forestry](#), [animal science](#), [veterinary science](#), rural life and economy, [food science](#) and [environmentally](#) friendly technologies. The university is a member of the BOVA university network. Contact: Hardi Tullus hardi.tullus@emu.ee, met@emu.ee, phone: +372 5098598
- **Estonian Forest and Wood Industries Association (EMPL)** – is a non-profit organisation gathering timber and forest-industry related organisations. Organisations objectives are: internationally competitive forestry and wood processing industry, standing for joint interests of the members and achieving common goals, raising awareness about the sector's role among society, sustainable use of forest, development and growth of the use of wood, innovative solutions within the sector. Vision is to developed forestry and timber industry and the appreciation of domestic wood support, a healthy environment for living and a decent standard of living. Contact: Ott Otsman, ott.otsman@empl.ee, phone: +372 503 2552

- **Graanul Invest AS** – Biomass producer. Contact: Margit Parmas, margit.parmas@graanulinvest.com, phone: +372 6699870
- **Warmeston OÜ** – Biomass producer. Contact: viljo.aros@warmeston.ee phone: +372 742 5696
- **United Loggers OÜ** – Biomass producer. Contact Peeter Volke, peeter.volke@united-loggers.ee, phone: +372 6626125
- **FSC Estonia** – NGO who is representative of FSC international in Estonia. Contact Marion Kade m.kade@ee.fsc.org, phone: +372 56 566 026
- **Maavalla Koda** - NGO representing land religious organisations. Contact koda@maavaldd.ee, phone +372 56 932 353

Annex 5: Stakeholder consultation report

NOTE: According to the RRA Procedure (<https://sbp-cert.org/documents/process-documents/regional-risk-assessment-procedure/>), during the minor update 2021 the Working Body did not need to conduct a stakeholder consultation. The Working Body still has contacted several stakeholders directly to obtain the latest data and statistics. The public stakeholder consultation for the minor update 2021 was organised by SBP. Stakeholder comments and SBP response may be found on SBP website in a separate document "Estonia RRA Minor Update Response to Consultation Oct21_FINAL".

The report below contains an overview and a summary of outcomes of Working Body stakeholder consultation process in 2015. Risk assessment was conducted as part of Sustainable Biomass Partnership risk assessment process in accordance with SBP Risk Assessment Procedure (v1.0). The stakeholder consultation report was prepared in accordance with the SBP Risk Assessment Procedure (v1.0) clause 4.13.

Stakeholder consultation process

The first stakeholder consultation round was completed from 26.03.2015-26.04.2015 and the second round took place from 05.05.2015-20.05.2015. The information about the risk assessment process development, along with the draft risk assessment, was sent out to all key stakeholders. Principal groups of identified stakeholders – biomass, timber processing industry, state authorities, non-governmental organisations working in environmental, social sectors, industry associations, associations of forest owners, certification bodies working in forestry sector and scientific institutions/academia. Stakeholders have been notified through email. The list of stakeholders can be seen in Annex 4. Three stakeholders, the Estonian Fund for Nature (ELF), Graanul Invest AS and the Estonian Forest and Wood Industries Association (EMPL) provided their feedback. Thus, it can be concluded that the main environmental stakeholder group and the industry sector provided their input.

Other stakeholder groups were covered via “Loodusaeg” mailing list. There are almost thousand readers starting with students and ending with all main nature related organisations including state authorities.

Additionally there were couple of meetings with industry representatives (EMPL). These meeting were held upon their request. Other stakeholders did not request for any meeting. With FSC Estonia NEPCon had couple of discussions via phone. With ELF some of the topics were also discussed before when the FSC NRA was developed.

Stakeholder Type	Stakeholders Notified # of individuals (# of institutions represented)	Stakeholders consulted directly or provided input (#)
Biomass, timber processing industry, companies	3	4
Non-governmental organisations	6	3
Authorities, government agencies	6	6
Associations	4	1
Forest owners associations	2	1
Academic, research institutions	1	1

A summary of stakeholder comments to Risk Assessment indicators that have been proposed a specified risk status.

1.1.2 Feedstock can be traced back to the defined Supply Base

Initially, specified risk was proposed for this indicator in relation to the supply base in sawmills and other timber processing entities, who might import timber for biomass production from other countries, especially those having a high corruption index (e.g. Belarus and Russia) and/or might mix it with the local timber during the biomass production process. The analyses of the statistical information and available reports indicated that the import of round wood and sawn timber from countries with a high corruption index constitutes a substantial part of the imported timber. However, the additional analyses and information sent by stakeholders indicated that the main part of the imported timber from these countries are re-exported to other countries as pulpwood products or consumed in internal markets and thus not used for biomass production. Only a very small amount of this imported timber is likely to be used for biomass production.

When comparing the total volumes of round wood used in Estonia (approximately 10 million m³) and the amount of imported round wood from Russia (12 000 m³), the amount represents less than 1 %. Moreover, according to the information received during the stakeholder process a lot of this material is pulpwood that does not end up in biomass production. This is because the custom taxes for Russian pulpwood are much lower compared to logs used for lumber production. Additionally, a lot of the pulpwood used in Estonia has the status of FSC Controlled Wood. Compared to the volumes produced on site, the amounts of imported lumber and/or firewood (wood residues imported to Estonia) are small (860 000 m³ of lumber and 180 000 t firewood and wood residues). In terms of controlled wood, these volumes represent supply from low risk countries and specified risk countries. Unfortunately we do not have the exact statistics about the share of material coming from specified risk countries, but as the total number is fairly small and taking into account that there is some material coming from low risk countries as well, the risk would be insignificant. In accordance with the additional information received from stakeholders, the risk designation was changed from specified to low risk.

1.4.1 The BP has implemented appropriate control systems and procedures to verify that payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting are complete and up to date.

Initially, based on an interview with the Estonian Tax and Customs Board in 2014 and some statistical information about paying VAT, specified risk was proposed for this indicator in relation to paying VAT. According to the additional information received during the stakeholder consultation it appeared that the tax loss of the forestry sector, compared to the total estimated tax loss in Estonia, is 1-2%. The stakeholders also presented a letter from the Minister of Finance, which stated that there is no need to apply new and more strict value added tax system (returned VAT) for Estonian Forest and Wood Industries Association and The Foundation Private Forest Centre. According to the Ministry of Finance the tax loss from the forest sector is very low compared to other sectors.

After the compilation of this risk assessment, a new requirement came into force. This requires that companies must register all invoices that are higher than 1,000 euros in the state database. According to the Tax and Customs Board info, it has already made an additional influence to the VAT declarations, which in early 2015 compared to the same period in 2014 increased by 12 %. Also taking into account that the total turnover was a little lower in 2015 than in 2014. According to the information mentioned above the risk status can be considered low for paying VAT.

2.1.2 The BP has implemented appropriate control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities.

EMPL and Graanul Invest sent additional information about the protection of Woodland Key Habitat (WKH). Later on NEPCon received addition comments Warmeston OÜ, Purutuli OÜ, Ardor OÜ and Stora Enso Eesti. The content of these additional comments were same – WKH related risk should be low. Statistics shows that 76,4 % of WKH are situated in state forest and thus protected. The remaining WKH are to be found in private forest areas. In private forests some of the WKH are situated in different protected areas, some in FSC or PEFC certified forest areas and 204 WKH are protected by the protection contract (voluntary agreement signed by the forest owner and state). The timber in WKH in private forests amounts to approximately 400 000 m³. The amount that theoretically might end up in biomass production is very small compared to the total amount of material used.

NEPCon requested additional information from the Environmental Agency and from the Ministry of Environment about the felling in WKH. Felling permits for 2-2.5 % per year for WKH areas in private forest areas, that are not covered by WKH contracts have been issued during the last three years. It must be mentioned that not all forest covered by these felling permits will be cut down (according to studies from 2011 60-80% of the issued felling permits will be used) but compared to the total amount of WKH without a WKH contract this amount is still high. WKH that has a protection contract is considered protected.

Even though WKH is situated in protected areas it does not necessarily mean that they are protected, because some management activities are allowed in some type of the protection zones. According to the studies done by the Private Forest Owners Union approximately 30% of WKH are situated in this kind of management zones where cutting may be allowed. In protection areas, landowners cannot sign a WKH contract with the state.

Thus, low risk cannot be justified for this indicator and companies sourcing material must mitigate the risk of WKH material entering their production.

2.8.1 The BP has implemented appropriate control systems and procedures for verifying that appropriate safeguards are put in place to protect the health and safety of forest workers.

Initially, specified risk was proposed for this indicator. This was related to the usage of Health & Safety equipment. During the consultation period, NEPCon received additional information relevant for this indicator from the Estonian Forest and Wood Industries Association. According to their studies, 96% of all logging conducted by harvesters and machine operators have a good working environment.

At the same time we received statistics from the Police about the fatalities related to self-employed persons (they are not controlled by Labour Inspectorate and accidents with them are therefore not reflected in their statistics). On average 1-3 fatalities annually are related to felling activities. This shows that there is some risk related to the logging. On the other hand, the Environmental Inspectorate together with the Labour Inspectorate have conducted additional inspections to control the fulfilment of the new act, which requires the registration of all workers. Therefore, the risk status can be changed from specified to low risk.

2.2.4 The BP has implemented appropriate control systems and procedures to ensure that biodiversity is protected.

ELF proposed to change the risk from low to specified risk since some of the protected species populations are experiencing a decline in numbers. However, many of the old forest related protected species are doing well and their populations have positive trends. Overall, the situation with species and habitat protection and biodiversity is considered good. Despite this additional comment made by ELF, the risk status will not be changed.

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.

ELF stated that some misleading information was found in the findings. NEPCon reviewed the findings and removed the misleading information about exact data and carbon calculations. Additionally, specified risk was proposed for this indicator, because wet forest that have drainage systems are also areas of high carbon stocks.

Most of the drainage systems to wet forest types were done before 2008 (most of them during the soviet occupation), which is why these areas are already considered to be spoiled areas in terms of storing carbon. Therefore, it was decided to maintain the level of risk as low.

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.

ELF proposed that low risk should only be possible in cases where the annual felling volume for Estonia is below 9 million m³. This proposition was based on a study ordered by the Environmental Ministry. NEPCon reviewed the study and consulted with Hardi Tullus, the professor of silviculture from the Estonian University of Life Sciences. Both the report and the interview with the professor showed that no practical studies related to the carbon emission from the forest soil have been done in Estonia. Furthermore, the models used in the studies are not developed for Estonia. Because these carbon calculation models are developed for other countries it is not reasonable to set additional numerical limitations for this indicator. Thus, the risk will stay low without any numerical volume limitations.

Annex 1: A summary of stakeholder consultation results

SBP indicator	SBP risk assessment process proposal / NEPCon	Biomass, timber processing industry opinion	non-governmental organisation opinion	Final version
1.1.2	Specified risk	Low risk	No comments	Low risk
1.4.1	Specified risk	Low risk	No comments	Low risk
2.1.2	Specified risk	Low risk	Specified risk,	Specified risk
2.2.4	Low risk	Low risk	Specified risk	Low risk
2.8.1	Specified risk	Low risk	No comments	Low risk
2.9.1	Low risk	No comments	Specified risk	Low risk
2.9.2	Low risk	No comments	Specified risk	Low risk

SBP Indicators, discussed in stakeholder consultation process

1.1.2 Feedstock can be traced back to the defined Supply Base

1.4.1 The BP has control systems and procedures to verify that payments for harvest rights and timber, including duties, relevant royalties and taxes related to timber harvesting, are complete and up to date.

2.1.2 The BP has control systems and procedures to verify that potential threats of forest management activities to the HCVs are identified and safeguards are implemented to protect them.

2.8.1 The BP has control systems and procedures to verify that appropriate safeguards are put in place to protect the health and safety of forest workers.

2.2.4 The BP has implemented appropriate control systems and procedures to ensure that biodiversity is protected.

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.

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.

Annex 2: Stakeholder comments

Letter sent to stakeholders:

Dear Stakeholder,

We would like to inform you, that we have prepared a Draft of the SBP Risk Assessment for Estonia, which is now ready for the stakeholder consultation. This SBP Risk Assessment includes environmental, social and economic aspects according to the SBP requirements.

We would very much appreciate your comments in regards to the individual risk designation or to the SBP Risk Assessment in general. Attached, you can find the official Stakeholder Announcement together with the Draft of the SBP Risk Assessment. You can submit your comments directly to me.

Please note, that we plan to organise a stakeholder workshop (more details in the Stakeholder Announcement) where you will be able to discuss your comments. However, to ensure constructive dialogue, we would like you to provide us your comments before the workshop takes place.

Kind regards,

Asko Lust

Lugupeetud huvirühma esindaja,

Anname teada, et on koostatud SBP riskihinnang Eesti kohta, mis on nüüd valmis huvigruppide konsultatsiooniks. SBP (Sustainable Biomass Partnership) kohta saate lähemalt lugeda nende kodulehelt: <http://www.sustainablebiomasspartnership.org/>.

Riskihinnang sisaldb endas keskkonna, sotsiaal ja majanduslikke aspekte lähtuvalt SBP nõuetest.

Kirjale on lisatud huvigruppide konsultatsiooni teade ning samuti riskihinnangu mustand. Kommentaarid palun saata otse minu mailile.

Lisaks on peale konsultatsiooni plaanis korraldada ka huvigruppide koosolek, kus on võimalik saadetud kommentaare arutada. Soovitame Teil oma kommentaarid siiski enne koosolekut saata. Koosoleku toimumise aeg ja koht selgub peale konsultatsiooni ning sellest antakse eraldi teada.

Lugupidamisega

Asko Lust

metsamajandamise ja tarneahela audiitor
NEPCon OÜ

E-mail: alu@nepcon.net

Mobiil: +372 55 653 894

Skype: asko.lust1

Filosooofi 31 | 50108 Tartu | Eesti

www.nepcon.net

26.03.2015

Tartu

SBP Risk Assessment for Estonia – Stakeholder consultation

SBP Scheme:

The Sustainable Biomass Partnership (SBP) was formed in 2013 by European utilities that are using biomass, mostly in the form of wood pellets, in large thermal generating plants. Biomass-fired power and heat generation is seen as an important technology for achieving the EU's 2020 renewable energy targets and EU member states are adopting their own national approaches to ensuring that the biomass used is legally and sustainably sourced. SBP's objective is to develop the tools necessary to demonstrate that, as a minimum, solid biomass used for energy production meets these national requirements.

The SBP Risk Assessment for Estonia was conducted according Standard #1 V1.0 - Feedstock Compliance Standard which sets out the principles, criteria and indicators to be met by participating Biomass Producers (BPs). The SBP Standard #1 can be found in SBP website - <http://www.sustainablebiomasspartnership.org/documents>. To obtain a copy of the applicable standard or make comments about these standards, please contact NEPCon by telephone, FAX, email or website listed below.

The purpose and scope Regional Risk Assessement (RRA)

The purpose of this RRA is to evaluate the risk of the Estonian forest management practices on a national level with aim to propose the risk designation for each indicator. The scope of evaluation includes all forest and plantations within the country. The objective of the stakeholder consultation is to engage stakeholder in a dialoque and provide opportunities to stakeholders to discuss the designation of the risk.

Consultation period

The consultation starts 26.03.2015 and will end 26.04.2015. The RRA will be completed 30 days after the last day of the stakeholder consultation. In case there is a need for additional consultation prior to the development of the Final RRA Report you will be informed accordingly.

Your Input Sought

As a part of the SBP Risk Assessment process we invite stakeholders to offer comment and feedback on the risk designation in relation to conformance with the requirements of the SBP Standard#1 referenced above. We welcome input, in whatever form is easiest and most secure for you. Your input will be valuable

at any stage of the Risk Assessment process, but we would prefer to meet you personally during our SBP Risk Assessment workshop (date will be announced separately) so that we can discuss them further within different stakeholder groups which shall lead to reaching a consensus.

Your options for communicating your observations to us are as follows.

1. Attend SBP Risk Assessment workshop.
2. Call and give comments to NEPCon.
3. Submit written comments by mail, FAX or email to NEPCon. Unless you request otherwise, these comments will be kept confidential and are solely for the purposes of assessing the risk.

Your comments will be published in the final Risk Assessment Report unless you require confidentiality.

Stakeholders who may wish to dispute any aspect of the RRA process or decision can access NEPCon's Dispute Resolution Policy at www.nepcon.net

The process of the RRA development is aligned with the "SBP Regional Risk Assessment Procedure V1.0". To obtain a copy of the this procedure, please contact SBP or NEPCon.

Contacting NEPCon

- Email: alu@nepcon.net for Asko Lust
- Worldwide Website – www.nepcon.net.
- Telephone – +372 55653894
- FAX – +372 7 380 724
- Mail address – NEPCon OÜ, Filosoofi 31, 50108 Tartu, Estonia

Comments from ELF

OÜ NEPCon

Filosoofi 31, 50108, Tartu

alu@nepcon.net

Eestimaa Looduse Fond: 9.04.2015

Esitame Eestimaa Looduse Fondi kommentaarid SBP (Sustainable Biomass Partnership) riskihinnangu kohta.

Üldisemaks kommentaariks kogu riskihinnangu kohta tuleb märkida, et biomass on laiem mõiste, kui ainult puit, kuid riskihinnang paraku teisi biomassi liike ei käitle. Veel enam, käsitletakse vaid tavapärasest metsandusest pärit puitu, mitte aga näiteks niitude taastamisest saadavat puitu.

Järgnevalt on toodud meie kommentaarid punktide kaupa:

Prg 2.2.4. The BP has control systems and procedures to ensure that biodiversity is protected (CPET S5b).

Selle indikaatori puhul ei saa meie hinnangul riski madalaks hinnata. Seda, et kõik ei ole elurikkusega metsades täna hästi, näitavad mitmete liikide arvukuse langustrendid. Kõige könekamaks neist näidetest võib pidada lendorava, kanakulli ja kopsusambliku langevaid arvukusi, kes kõik vajavad eluks vanu loodusmetsi.

Prg 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.

Teeme ettepaneku riskihinnangus kindlasti käsitleda järgnevat analüüs: „Eesti võimalused liikumaks konkurentsivõimelise madala süsinikuga majanduse suunas aastaks 2050“. (http://www.envir.ee/sites/default/files/loppraport_2050.pdf vaata tabel77 lehekülgel 240) Selles näitavad Keskkonnagentuuri tehtud arvutused, et raiemahu puhul üle 8-9 millon tihumeetri hakkab metsade tagavara oluliselt vähenema, mis omakorda tähendab süsiniku emissiooni. Seega tuleks riskihinnangus ära märkida, et „low risk“ on see indikaator ainult juhul, kui aastane raiemaht on alla 9 millon tihumeetri.

prg 2.9.1. "The wetlands, which contains the high carbon value according to Estonia legislation have strict protection regime. First forestry practices were suspended in wetland forest stands situated around big bogs due to establishment of strict nature reserves of big wetlands."

See on pooltöde, enamus nendest aladest on maardlate nimekirjas. Turbamaardlatena on arvele võetud ligikaudu 0.5 mln ha, sookaitsealade pindala on veidi alla 200 000 ha.

See, et kas nende ümber kehtivad metsaraie piirangud, on eksitav. Kindlasti on see nii reservaatides ja sihtkaitsevööndites, kuid piiranguvööndites ei ole see absolutne. Seda enam, et soode ja kaitsealadega piirnevates metsades toimuv majandustegevus, sh kuivendus, võib otseselt mõjutada kaitsealade väärtsusi (lisa: Eestimaa Looduse Fondi kommentaarid ja vastulause Änglema, TTP-593 maaparandusehitiste rekonstrueerimise (REK 2012) ehitusloa andmise keskkonnamõju eelhinnangule, Natura-eelhinnangule ning keskkonnamõju hindamise algatamata jätmise eelnõule).

prg 2.9. 1."The forest statistic indicates that during the last decade and after the year 2008 no changes occurred in the protected areas where the high carbon stocks are stored (wetlands and peat lands), therefore no biomass could be sourced from areas that had high carbon stocks in January 2008. "

Siinkohal puudub meie teada statistika, mis töendaks, et kaitsealadel raiet ei teostata ning et nendel paiknevate metsade tagavara pole muutunud. Väite töestuseks palume esitada vastavad andmed.

Aruande annab hinnanguks: "low risk", millega ei saa kindlasti nõustuda. Turvasmuldadel paiknevates metsades toimuv kuivendus on oluline CO₂ emissiooni allikas, samuti võivad kuivenduse mõjul väheneda nende kui ka kõrvalpaiknevate alade mullastiku süsinikuvarud.

Ettepanek määratleda riski tase: "specified risk". (vt lisa: Eestimaa Looduse Fondi kommentaarid ja vastulause Änglema, TTP-593 maaparandusehitiste rekonstrueerimise (REK 2012) ehitusloa andmise keskkonnamõju eelhinnangule, Natura-eelhinnangule ning keskkonnamõju hindamise algatamata jätmise eelnõule).

Lugupidamisega,

Liis Kuresoo

Eestimaa Looduse Fond

Juhatuse liige

Comments from EMPL

Nepcon OÜ

Asko Lust

alu@nepcon.net

24.04.2015

SBP (Sustainable Biomass Partnership) Eesti riskihinnangu konsultatsiooniprotsess

Eesti Metsa- ja Puidutööstuse Liidu kommentaarid

Vaadanud läbi Nepconi poolt koostatud esialgse SBP riskihinnangu leiame, et riskihinnangu koostamisel on liiga vähe arvesse võetud Eesti metsamajanduse jätkusuutlikku olemust, Eestis toimivat seadusandlust ning korrektselt toimivaid regulatsioone. Esialgne riskihinnangu raport määratleb et nelja indikaatori riskide juures ei ole (osaliselt) tegu madalate riskitasemetega.

1. Materjali päritolu jälgitavus (1.1.2.)

Raportis leitakse, et materjali päritolu jälgitavus on kõrge riskitasemega impordi puhul neist maadest mis ei ole EL maad. Märgime, et puidutoorme import neist maadest on väga väike, mida näitab ka raport (12200 m³). Kogu Eestis kasutatav toormemaht on ca 10 miljonit m³, seega moodustab nimetatud 12200 m³ sellest vaid 0,1%. Täiendavalt märgime, et kuna kogu kolmandatest maadest imporditav materjal allub EUTR regulatsioonile ning osa sellest on ka sertifitseeritud FSC või PEFC järgi, siis on tegemist Eesti jaoks väga väikese riskiga, et kõnesoleva materjali päritolu ei oleks teada või jälgitav.

Seega tuleb päritolu jälgitavuse risk hinnata madalaks.

2. Maksuriskid (1.4.1)

Raportis leitakse, et maksuriski ei saa hinnata madalaks kuna on tuvastatud maksupettuseid.

Juhime siinkohal tähelepanu kolmele asjaolule:

1. Vastavalt Eesti Rahandusministeeriumi infolle (kiri Rahanduministeeriumilt 19.04.2010) moodustavad käibemaksukaod metsasektoris kogu käibemaksu kaost vaid väikese osa ning käibemaksurisk metsasektoris on liiga madal, et rakendada erimeetmeid (pöördkäibemaks). Samuti viidatakse asjaolule, et maksurikkumised metsasektoris on väheneva trendiga.
2. Vastavalt Maksu- ja Tolliameti infolle (e-kiri 8.10.2014) moodustab maksukahju metsasektoris vaid 1-2% kogu maksukahjust.
3. Alates 01.11.2015 kehtestati Eestis uus regulatsioon mille alusel kõik ettevõtted (sh metsasektor) peavad MTA-le deklareerima igakuiselt kõikide 1000 ületavate tehingute ostjate ja müüjate andmed. Vastavalt MTA infolle on nimetatud regulatsioon juba 2015 a alguses andnud tulemusi ja käibemaksu laekumised on töusnud 12%.
4. Alates 1.06.2014 peavad kõik Eesti töötajad olema registreeritud töötajate registris, mida haldab MTA <http://www.emta.ee/index.php?id=35283>.

Ülaltoodut arvesse võttes tuleb maksurisk hinnata madalaks.

3. Metsa majandamine ja kõrge kaitsevärtusega alad (2.1.2)

Raportis leitakse, et vääriselupaikade kaitsmisel erametsades on riskid, mida ei saa hinnata madalaks.

Siinkohal soovime juhtid tähelepanu asjaolule, et vääriselupaiga väljavalikut korraldab Metsaseaduse järgi Keskkonnaministeerium Keskkonnaagentuuri ja Keskkonnaameti kaudu, seega ei sõltu see metsaomanikust ning metsamajandamiskavade koostamisel võetakse arvesse vääriselupaikadega seonduvad meetmed elupaiga kaitseks. Tervikuna on Eestis kaitstud metsade osakaal kõrgeim Euroopa Liidus. Metsale tekitatud keskkonnakahju on aastaraamatu Mets 2013 järgi oluliselt vähenenud 13 aastasel perioodil 2000-2013. Vastavalt kahjujuhtude arv 98,7% (1394-t 18-le) ning rahasse hinnatult 99,3% (7,5-lt miljonilt eurolt 50 tuhandeni).

Toetudes ülaltoodule tuleb risk kõrge kaitsevärtusega aladele hinnata madalaks.

4. Tööohutus metsas (2.8.1)

Raportis leitakse, et serifitseerimata metsades ei saa hinnata tööohutuse riski madalaks.

1. Vastavalt raievõimsuste analüüsile (EMPL poolt läbi viidud 2012) on 4% raietest Eestis teostatud raietööliste poolt ning 96% on masinraie osakaal. See näitab, et enamus raieid on tehtud heas töökeskkonnas ja ohututes tingimustes ehk operaatorikabiinis.
2. Raiemaht 2014 aastal kasvas esialgsel Keskkonnaagentuuri hinnangul ~10%. Samal ajal vähenes tööõnnnetuste arv Tööinspektsiooni andmetel 5% (20-lt 19-le).

Ülaltoodut arvesse võttes tuleb tööhu risk hinnata madalaks.

Lugupidamisega,
Eesti Metsa- ja Puidutööstuse Liit
Ott Otsmann
tegevjuht
ott.otsmann@empl.ee

Nepcon OÜ
Asko Lust
alu@nepcon.net

20.05.2015

SBP (Sustainable Biomass Partnership) Eesti riskihinnangu konsultatsiooniprotsess 2 (pikendatud)

Eesti Metsa- ja Puidutööstuse Liidu täiendavad kommentaarid

Vaadanud läbi Nepconi poolt koostatud esialgse SBP riskihinnangu ja vastuse esimese vooru kommentaareidele kõrge kaitsevärtusega alade metsade majandamise osas, (indikaator 2.1.2) leiame, et ka indikaator 2.1.2 osas tuleb Eesti risk hinnata madalaks. Esitame alljärgnevalt täiendavad kommentaarid ja põhjendused.

Nepconi hinnang ütleb, et erametsade VEP-de (vääriselupaigad) raiumise risk on kõrge.

Keskkonnaagentuuri andmetel on Eestis arvel 8654 VEP-i (4818 vääriselupaika ja 3836 vääriselupaiga tunnusega ala) kogupindalaga 21343,9 ha (vastavalt 9260,6 ha ja 12 083,3ha). Vääriselupaikadest asub riigimetsas 8232 VEP-i pindalaga 16306,8 ha ja erametsades 3932 VEP-i pindalaga 5037,1 ha. Seega FSC sertifikaadiga riigimetsas asub 76,4% VEP-dest ja erametsas 23,6% VEP-dest. Erametsas asuvatest VEP-dest asub kaitsealadel (siht-, piiranguvööndis või hoiualadel) 1350 VEP-i kogupindalaga 2316,7 ha-d. Väljaspool kaitsealasid asub 2582 VEP-i pindalaga 2720,4 ha-d. Lepingutega on kaetud 221 VEP-i pindalaga 407,9 ha-d. Seega on otsese kaitse alt väljas 2361 VEP-i pindalaga 2312,5 ha-d, mis teeb vaid 10,8 % VEP-de üldpindalast.

VEP-d asuvad enamasti looduslikult raskesti ligipääsetavates kohtades (liigniisked alad, järsud nõlvad jne.) ja vähesel inimmõju tõttu on nende puiduline väärthus madal. Seetõttu on ka metsaomanike majanduslik huvi VEP-de raieks madal.

Tavaliselt asuvad VEP-d inimasustusest ka suhteliselt kaugemal, mistõttu puudub huvi Metsaseaduse § 41 (14) järgselt raiet teostada.

Vääriselupaikade ideoloogia põhiprintsiip on algusest peale olnud vabatahtliku kaitse põhimõte. Seetõttu tuleb arrestada ka VEP-de sentimentaalset vääritus, mistöttu on paljude maaomanike jaoks VEP-i raie moraalselt välistatud.

Kõike eelpool toodut arrestades tuleb risk kõrge kaitsevärtusega aladele hinnata madalaks.

Lugupidamisega,

Eesti Metsa- ja Puidutööstuse Liit

Ott Otsmann

tegevjuht

ott.otsmann@empl.ee

E-mail 16.06.2015

Tere ja tänud Askole saadetud info eest,

EMPL on seisukohal et nii väikese % võimaliku raie korral WKH-des tuleb risk siiski madalaks hinnata. Asko saadetud tabelis on välja arvestatud, et kuni 8,2% WKH-dest võivad statistika järgi sattuda raiesse erametsades. Samas on seal arvestatud 5 aasta teatiste hektarite summaga? Arvestus peaks olema viidud minu arusaamise järgi ikka aasta baasile, st et kui suur on siis risk, et aasta jooskul läheb midagi raiesse. Sest aasta baasil arvestame ju kõiki muutusi ka WKHde pindalade muutusi vmt. Tegin tabelisse lisaarvestuse võttes arvesse aasta baasilt suhte WKH-de pindalasse erametsades. Sellisel juhul jäab võimalik raie WKH-des 1% juurde. Palun vaadake lisas olevast tabelist.

Translation of the section above was asked by EMPL: In EMPL opinin the WKH related risk must be evaluated as low due to the low % of potential cutings in WKH-s. In table sent by Asko 8,2 % of WKH may end up as cuttings according to the statistics. On the other hand this is calculated as sum per 5 years? In my opinion the calculations should be done on yearly bases, calculating how big is the risk that something is cut down. Ther changes in WKH areas are also done on yearly bases. I made some additional calculations to the table realted to cutings in WKH in private forests. In this case the potential cutting volume is around 1%. Please see the table below.

	Nr	ha	in RPK nr (76,4%)	ha	in private forests nr (23,6%)	ha
Total WKH	12164	21343,9		8232	16306,8	3932 5037,1
Protected with WKH contracts					221	407,9
Situated in protected areas (in different management zones)-> this does not mean that protected					1350	2316,7
WKH without any protection					2361	2312,5
WKH that are not protected with WKH contracts					3711	4629,2

	Aasta									% out of WKH not covered with contracts on private forests (5 year period)	Average, year, Private for, ha		
Felling permits issued in WKH	2010	2011	2012	2013	2014	All	Private	All	Private	All	Private	All	Private
Nr of felling permits that include WKHs	56	38	52	41	91	75	87	75	109	95	95		
Area of WKH covered by felling permits, hectares	69,3	37,9	53,6	44	108	89,6	98,7	88,4	130,2	122,3	382,1	8,20%	76,42
* out of total felling	12,7	11,6	24,4	23	62,8	61,8	54,3	53,8	94,2	93,1			48,52
Nr of WKH covered by felling permits	67	35	57	44	88	78	83	75	113	104			

Forest department of Ministry of Environment states that in private forests approximately 60% of issued felling permits will end up with actual fellings and in State forest the percentage is approximately 80%. It is not possible to say how many felling permits are actually used.

It is not possible to say how many felling permits are actually used

WKH rale võimalik % erametsas	1,5%
Arvese võttes ka teatiste realiseerumist	0,9%
WKH uuendusrale võimalik % erametsas	1,0%
Arvese võttes ka teatiste realiseerumist	0,6%

Igal juhul, ükskõik kuidas ei arvesta, jäab võimalik raiutav maht WKHst ikka väga madalaks, mistõttu ju risk on ka madal. Lisada tuleb veel ka seda, et osa WKH-dele võetud metsateatistest on põhiustatud

näiteks tormimurrust vmt looduslikust protsessist mille tõttu seal WKH tunnused kaovad, ehk et väärthuslik liik kaob sealt mingil looduslikul põhjusel.

Põhmötteliselt olen reedel 19.06 Tartus, meil on hommikul Puuinfo koosolek Tartu Loodusmajas. Peale seda (peale 11.30) võiks ka kokku saada vajadusel Nepconis.

Tervitades,

Eesti Metsa- ja Puidutööstuse Liit

Estonian Forest and Wood Industries Association

Ott Otsmann

Tel: +3726567643

Fax: +3726567244

GSM: +3725032552

ott.otsmann@empl.ee

www.empl.ee

Comments from Graanul Invest AS

NEPCon Estonia
Asko Lust
Chain of Custody and Forest Management auditor
Floosoofi 31 | 50 108 Tartu | Estonia

In Tallinn 22.04.2015



COMMENTS
to the SBP Risk Assessment of Estonia

Firstly on behalf of Graanul Invest (producing about 65% of wood pellets produced in Estonia and using in process around 15% of the total woody biomass volume cut in the forests in Estonia) we are utterly disappointed on the process of putting SPB Estonian country report in place.

The report and potential risks established consist of opinions of auditors without any reference to actual data behind such opinions and there is no trend curves that would establish any reason for such evidence. Futheron there has been no engagement of the actually affected industries, companies or sectors involved. What is even worse is that the conclusions on potential issues is often in full or in material respect in contrary to the opinions of the experts who have given their input.

So taking that into consideration, in our opinion the country report as it stands today is of no actual value in evaluation potential risks or their mitigation mechanisms in Estonian forestry and should be amended. There have neither been any public processes to evaluate or challenge the findings in the report so far.

Bioenergy business is integral and important part of Estonian forestry sector (at least 30-40% of wood cut in Estonia is used in different energy applications) and putting together a report without reasonably taking into consideration the actual circumstances is in my opinion very counterproductive to the further increase of the level of sustainability in the forestry sector of Estonia and leads to wider distortions of the wood market in general.

The report has established four specified risks that need to be mitigated in Estonia:

1. Feedstock cannot be traced back to its supply base;
2. Tax and duty payments for harvesting rights and operations;
3. Forest management activities in HVC-s are not regulated;
4. Lack of relevant safeguards to protect the health and safety of forest workers.

The general comment on all the issues above is that what is the basis of such unspecified risk? Is there a reference criteria to mark that risk as unspecified or is it subjective decision of the auditor? What would be the reference points to consider any specific risk as low risk is also not described. So in my opinion auditors in their approach are rather than looking at actual situation creating a future job pattern for themselves *a'la* we will create a problem and then if you pay us for mitigation audit we will approve that You have mitigated it. I am sorry for harsh opinion here, but there is little ways to describe the process otherwise.

Now to the detailed unspecified risks:

1. Feedstock cannot be traced back to the supply base.

In our opinion the amount of feedstock used by Estonian wood industry that comes from outside of Estonia and from non EU countries is very small (some come from Latvia, but the forestry sustainability level in Latvia is of similar standard as in Estonia). The material that comes from outside of Estonia and Latvia is mostly material that comes here for transit to third countries (pulpwood) or already processed goods for further processing (boards for shaving lines in Estonia). Material that comes into Estonia must be (and there is no evidence that it is not) in accordance with EUTR and as such at least CW level certified. In Annex 1 of the report it is stated that round wood export from Russia was 12.200 m³, how much of it was re-exported (in transit) and how much of it was certified wood (FSC or PEFC) is also not shown. In reference Estonia harvests around 10 mio m³ of wood per year and thus this 12.200 m³ is in total 0,1% of round wood used in Estonia (taking the worst case scenario that all wood is utilized by the industry here). And all that wood is subject to European Timber Regulation anyway.

So in order to objectively (and not subjectively) evaluate that risk we need to look at actual statistics now and historically and potential problems involved. If there is no problems involved then what would be the basis of evaluating this risk at such high level? We see the level of foreign material strongly decreasing in Estonian wood industry and if the auditors would actually find out and show the historical data then it will be evident that such risk is irrelevant in the big picture.

So I think there is necessary mitigation measures in place countrywide:

- a) Volumes are really marginal
- b) We have EUTR in place
- c) Most of the wood imported from third countries is certified

2. Tax issues with respect to forestry operations.

In order to evaluate that risk it is necessary to evaluate the actual data on the basis of which such statement is made. In our opinion huge progress has been made to regulate forestry operations and make them more transparent in Estonia. Also the amount of paperwork and regulation that goes along with round wood makes tax evasions very scarce in Estonia. There is also quite strong consolidation happening in the forestry sector so there is less and less companies involved. So in order to actually give any opinions on that specific risk we need statistics of established tax issues in the forest level in Estonia and also an official opinion from Estonian Tax Office that that risk exists and everybody needs to start checking everybody. Graanul Invest have asked specific actual tax data from the Tax Office but due to the limited period to respond we have not received it yet. Though in my opinion it should have been a must to the auditors to ask for such data and analyze it as part of making any conclusions whether there is a major risk or not.

If You look Estonia's general position in the tax collection efficiency in the world then we are in the very high level. So the question would be, what is the level where Estonia would be a low risk country and what is the level we would be a high risk. In my opinion it is in this context inadequate that an auditor has an opinion that the risk is there, there has to be a reference and where is Estonia in comparison to that reference.

Also the mitigation mechanisms provided are not reasonable. The possibility that counterparty has tax debts is in Estonian legal system not a hindrance to the commercial activity and has never been also in any commercial discussions. Even the biggest companies can from time to time have tax debts and to exclude them from business environment would be unproportional and definitely not help neither their situation nor total business environment.

In Annex 1.4.1 auditors/experts describe different measures how potential tax evasions are controlled and what measures have been taken into use (registry of workers, checks on site by tax office), which would normally describe that the risks are under control, but nevertheless the conclusion is surprisingly that the risk is still big and further action is needed. Such conclusion compared to the actual statements of experts about the situation seems to be completely arbitrary.

3. Forest management and HVC-s.

To introduce that issue we first have to note that proportionally Estonia has highest percentage of protected forests in the EU (most of them historically belong to the State Forest Company (That has FSC certification) or have been acquired by the State Forest Company), meaning that the area where cutting and forest management operations are limited in order to protect forest or wildlife is the highest in Europe. To come to the point in our opinion Estonian forest operations are one of the best regulated that we have seen and heard in different countries (Graanul Invest has looked at different projects in quite a few countries). The same was also stated by Estonian Forest Inspectorate who according to Annex 1 point 2.1.2 have noted that measures are working well and there is satisfactory legal regulation that is working well and also strongly enforced. The number of violations is small and violations are insignificant. Also the level of infringements is decreasing yearly basis. And yet the conclusion is that the risk in the private forest is high.

There are two cases here which are confused in the text of audit and need to be looked separately:

- a) Cutting in the private forest in WKH-s in larger scale with cutting permission and on the basis of forestry plan and
- b) Minor cutting in the forest (including in the WKH-s) without cutting permission required.
- c)

We see that it is important to make clear distinction here and separate the two.

- a) In the case of cutting in private forest in the area of WKH-s on the basis of cutting permit, such cutting permit will already consider all the implications necessary to protect the WKH-s. It is not necessary and actually is contrary to the meaning of WKH-s that cuttings should be prohibited there, rather the aim is to protect the integrity and ecosystems in the area and monitored and adjusted forestry activities are almost in all cases necessary to protect these areas. This is also done and regulated by the cutting permits and long term forestry management plans on the basis of which cutting permits are issued. So the system of long term forest management plans is actually covering the problem and that has also been clearly stated by the Environmental Inspectorate.
- b) The second instance is when cuttings are done by the owners without cutting permit. Such operations are allowed in very limited scope and only for certain thinning operations the scope and composition of which is very limited and well defined by law. Also the amount of such fellings in Estonia is minor (described in 0, something in percentage wise of total cutting).

So while both Environmental Inspectorate as well as actual practice on ground show that there is no actual problems and the issue is strongly controlled and there is very few infringements, the auditors nevertheless come to the conclusion that risk level in private forest is high. How have the auditors come to that conclusion? Again there is no reference to any reference values or indicators in the regional or international basis. So it is obvious that the conclusion is completely contrary to the actual situation and expert statements in the audit.

We have searched for actual statistics available in Estonia and it can be found from Estonian forestry yearbook of 2013 (latest one available so far). We have attached as appendix a table describing the actual

situation and historical trends to our comments. It shows that in total Estonian forestry the amount of forest damage caused in 2013 was 80,433 EUR. If we take that average cutting was 10 mio cbm and average log price is 45 EUR/ cbm then the percentage of damage caused to the nature vs. the business volume is considerably smaller than potential statistical mistake and was 0,0018 %. We also bear in mind the comment in the report itself that most of these damages are minor damages to the roads and ditches etc. Thus there is clear and publicly available evidence that national state level controls and measures work perfectly and no private measures are additionally needed.

4. Safety of workers in the forest operations.

If we look at the findings of the report then the risk is described as low by the Forest Working Union, usage of safety equipment is widespread and the situation is improving fast. Also there is very strong control by the Labour Inspectorate to check and enforce the legislation in Estonia which fulfills all the requirements pointed out by auditors. With this respect we have two issues to look into, firstly is the risk there and secondly how can we mitigate it. Again there is no reference with respect to the scope of the issue compared to any benchmark, so the conclusion whether there is a major risk or not is arbitrary and a subjective opinion of auditors. In this case it is impossible for anyone to argue against that position or to consider whether such conclusion has any merit or not. In our opinion Estonia has legal system in place that requires protective measures and practices to be in place and we fully agree with the Forestry Workers Trade Union that the situation is under control and as trend improving fast. So unless we can be presented evidence that we have a real issue there it is arbitrary to consider that risk high. Again consolidation of the forest industry has improved and is improving the situation further.

The second question is how to mitigate that risk and here the opinions are just not workable. Estonia has huge amount of private forest and the only cases we could have potentially issues is when in private forest the owner or his subcontractors would manually come to cut the forest. Such forest operation are very small in scope and there is no available statistics to me but I believe that more than 95% of timber volume is already felled by harvesters to ensure better quality and reduce the cost of forest operations. The wood from those private landowners comes to the market once placed at roadside and after the felling operations are concluded, so there is even if required no way for anybody to go and see if they use protective gear or not. As a side comment the mitigation measure would be to have FSC FM certificate, but also in those audits some infringements have been found!!!

So again the question here is weather Estonian state with the laws and regulations and applicable control mechanisms in place will be able to cover the situation or will it require third party interference and what could be the result of such interference. In my opinion we have a law in place with very harsh punishments for nonfulfillment. The fulfillment of that law is checked regularly and placing the focus on the risk areas by Labor Inspectorate. Public organizations have full array of potential measures to influence the fulfillment of these requirement up to imprisonment of responsible people in the most extreme cases. I think the mitigation mechanisms described in the audit will add very little value there as state has much stronger and effective means to control that. Graanul Invest has in its group two forestry operations companies and from our own practice we can tell that state audits are much more strict and comprehensive than the audits for OHSAS 18001 certificate (that we also have).

So in my opinion every measure must be used and initialized if it has an aim and there is a possibility to improve the situation and get closer to the aim by doing it. How the complicated and in real life unusable mechanism would help us to do that is unclear.

In conclusion in the SPB audit we need to bear in mind that bioenergy industry is part of wood and forest industry and heavily based on the residues of other industries in that sector. So big part of our raw material is residues from other industries. Creating an arbitrary set of rules to the bioenergy industry that is neither necessary, nor relevant and in the end of the day will hardly bring along any improvement of the current situation is just counterproductive.

If we look at the Estonian forestry in general then it is well organized, forests are well protected to ensure the sustainability and continuity of that industry and nature and wildlife preservation has always been the integral part of that system. We all have to agree that unfortunately accidents happen in forest operations, somebody tries to avoid paying taxes and even intentionally or unintentionally infringements happen in cutting operations. What is important to understand here is that firstly situation is getting better year by year and Estonia as a state has all necessary regulations and enforcement mechanisms in place to reduce and minimize such events. And that policy bears fruit, we see constantly that things are improving. Also under this point we have asked for actual statistics and data from state organizations but have not received it yet (it usually takes up to 30 days to make such specific data available).

Creating a secondary third party industry on the side of state to control and mitigate these issues is in my mind selfish attempt to artificially find a problem in order to provide later a service how to solve it. And I do not see it necessary. In my opinion and after getting acquainted with the latest SPB standards it is obvious that Estonian forestry sector does not have a current date issues that need to be specifically mitigated on top of the mitigation measures already in place.

And as final remark putting together an industry wide standard without consulting in the process with any party in the industry just shows how biased the process has been.

I hope that our comments can be helpful to explain the situation in the forest sector in Estonia and will be utilized in the final SPB Estonian Risk Assessment. As soon as further information and statistics becomes available to us, we will also forward those to the same group.

Raul Kirjanen
CEO

graanul invest

AS Graanul Invest
Humala 2, 10617 Tallinn, Estonia
Tel. +372 6699870
Fax +372 6699871
e-mail: raul.kirjanen@graanulinvest.com
www.graanulinvest.com

7.1.1 Metsaõigusnormide riikumised 2013. aastal maakonniti ja kokku aastail 2000–2013 Violation of forest protection regulations by counties in 2013 and total for 2000–2013

Country	Number of districts*	Kestmine riikumised annetud Eesti alale				Kestmine riikumised annetud Eesti alale				Kestmine riikumised annetud Eesti alale				Kestmine riikumised annetud Eesti alale				Kestmine riikumised annetud Eesti alale				
		Metsamaksimumpiiri	Tahvelaid	Tahvelaid	Tahvelaid	Tahvelaid	Tahvelaid	Tahvelaid	Tahvelaid													
Huu	8	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6
Ida-Viru	15	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10	10
Järvamaa	5	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6
Lääne-Viru	12	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Põlva	14	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12	12
Pärnu	10	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9	9
Peipsi	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Saare	1	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	6
Tartu	4	7	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Viljand	7	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8
Yksi	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Kokku	95	0	76	76	76	76	76	76	76	76	76	76	76	76	76	76	76	76	76	76	76	76
(2009-2013)	133	0	86	11 396	0	77	0	77	0	77	0	77	0	77	0	77	0	77	0	77	0	77
2012	133	0	86	11 396	0	77	0	77	0	77	0	77	0	77	0	77	0	77	0	77	0	77
2011	160	110	16 380	1	23	20	105 706	22	22	1 002	108	108	108	108	108	108	108	108	108	108	108	108
2010	212	162	17 893	1	20	107 788	22	22	355	115	355	355	355	355	355	355	355	355	355	355	355	355
2009	166	128	16 740	8	22	84 934	10	10	533	125	533	533	533	533	533	533	533	533	533	533	533	533
2008	260	1	217	32 250	4	50	173 925	32	32	328	149	328	328	328	328	328	328	328	328	328	328	328
2007	303	4	242	33 088	30	61	124 602	43	43	1 983	116	1 983	116	1 983	116	1 983	116	1 983	116	1 983	116	1 983
2006	441	4	318	36 611	42	64	459 517	70	70	9 224	184	9 224	184	9 224	184	9 224	184	9 224	184	9 224	184	9 224
2005	781	0	988	75 138	113	170	1 241 708	136	136	26 782	316	26 782	316	26 782	316	26 782	316	26 782	316	26 782	316	26 782
2004	1 490	39	833	68 950	143	452	4 206 837	544	544	92 123	395	92 123	395	92 123	395	92 123	395	92 123	395	92 123	395	92 123
2003	1 761	30	9 561	86 081	61	486	4 750 429	869	869	112 001	487	112 001	487	112 001	487	112 001	487	112 001	487	112 001	487	112 001
2002	1 722	95	825	72 441	107	551	6 222 594	837	837	127 060	101	127 060	101	127 060	101	127 060	101	127 060	101	127 060	101	127 060
2001	1 975	105	894	53 910	210	887	6 708 279	1 069	1 069	141 405	934	141 405	934	141 405	934	141 405	934	141 405	934	141 405	934	141 405
2000	2 267	83	884	53 120	232	1 304	7 458 875	1 681	1 681	172 531	1 242	172 531	1 242	172 531	1 242	172 531	1 242	172 531	1 242	172 531	1 242	172 531

* metsamaksimumpiiri üleületatud metsad mõõtmeid ei hinnata. Mõõtmeid ei hinnata ka metsade osade, mis pole mõõtmete eest saanud.

Allikas: Keskonnaministeerium, Välisministeerium, Põllumajanduse- ja Erakoda-keskusasjadeamet.

** metsamaksimumpiiri üleületatud metsad mõõtmeid ei hinnata.

Source: Environmental Agency of Estonia, Ministry of Environment, Ministry of Agriculture and Rural Affairs.

Ma sain Keskkonnaministeeriumist vastuse, et sellise info kogumine võtab palju rohkem aega, sest ühtset infobaasi selles osas ei ole.

Keskonnaministeerumi andmetel on erametsades olevate vääriselupaikade puiduressurss kokku alla 400.000 tihumeetri.

Arvestada tuleb seda, et erametsades on vääriselupaiku ca 2800 ha ja nendest ca 20% on kaetud lepinguga KKMga ning kindlasti oluline osa ka PEFC sertifikaadiga.

Nagu Ott Otsmani kirjast välja tuli, siis suur osa vääriselupaikadest on ka kas kohaliku elu mõttes kaitstud või asuvad äärmiselt raskesti kättesaadavates kohtades.

Seega potensiaalses komertskasutuses oleva puidu hulk vääriselupaikades on suurusjärgus maksimaalselt 100-150.000 tihumeetrit.

Kui võtta selle resursi reaalne majandamisaktiivsus, siis maksimaalselt võiks sellist puitu olla komertskasutuses aastas suurusjärgus 3000 - 5000 tihumeetrit.

Ehk me räägime väga väikestest komakohtadest.

Siinjuures tuleb tähele panna veel ka teist asja ja see on metsamaomandi suhteliselt kiire konsolideerumine Eestis ja valdavalt on sellised konsolideeritud metsaüksused PEFC sertifikaadiga sertifitseeritud.

Seega aja jooksul see probleem väheneb iseenesest veelgi.

Lisaks sellele on sertifitseerimise alal väga aktiivsed ka ühistud ja Erametsakeskus. Räägitud on ka sellest, et metsakorralduslike meetmete toetused siduda metsade sertifitseerimisega.

Minu ettepanek on nagu ennegi, ma ei näe selles probleemis kõrget riskiastet, kus tööstus peaks midagi või saaks midagi täiendavat teha.

Kui vaadata trende (maomandi konsolideerumine, uus FSC CW süsteem, võimalike toetuste sidumine metsanduse sertifitseerimisega), siis olukord on kontrolli all ja probleemi reaalselt ei ole.

Raul Kirjanen
CEO

graanul invest

AS Graanul Invest
Humala 2, 10617 Tallinn, Estonia
Tel. +372 6699870
Fax +372 6699871
e-mail: raul.kirjanen@graanulinvest.com
www.graanulinvest.com

Comments from FSC Eesti

Email 16.06.2015

Tere!

Seoses indikaatoriga 2.8.1 ei mõista täpselt riski hindamist madalaks. Ma saan aru argumendist, et 96% raietest tehakse harvesteridega, aga ometi oli algses SBP riskihinnangus info, et palju on probleeme nt protseduuride, tööohutusjuhendite ja koolitustega või ei vastanud need nõuetele ning kokkuvõttes olid ka rikkumiste numbrid päris suured. Harvesterijuhi enda tööohutus otseselt võib ju tagatud olla, aga kui protseduurid jm sellega kaasnev (tööohutuseeskirjad) ei ole korras, ei pruugi kõigi osapoolte tööohutus tagatud olla. Lisaks on siis nüüdsest viimases versioonis välja toodud info FIEde kohta ja ilmneb, et nendega on 1-3 surmajuhumit aastas. Ma arvan, et selle riski madalaks määratlemiseks on vaja natuke rohkem pingutada kui arvata, et 96% raietest on harvesteridega, kelle juhtidega on kõik hästi. Kas Tööinspeksioonilt ja erinevatelt ministeeriumitel ei oleks võimalik välja uurida, milline on näiteks

tööõnnestuse ja sellest tuleneva ajutise töövõimetuse (haiguspäevad), aga ka pikemaajalise töövõimetuse (invaliidistumine) rahaline möju ettevõtetele ja riigile. Lisaks siis ülirasked tööõnnestused, mis lõppevad surmaga. Võrdluseks, hiljaasagu avaldatud justiitsministeeriumi tellitud uuringust selgus, et ühe tampa hind ühiskonnale on nt 1,25 miljonit eurot. Siit võiks retooriliselt küsida, milline on vastukaaluks rahaline möju ühiskonnale, kui ettevõtted peavad veidi rohkem tervise- ja tööohutusnõuetega vaeva nägema?

Indikaatori 2.9.2 puhul on jäänud kesiseks põhjendus, miks ELFi kommentaari mitte arvesse võtta. Erinevad erialaeksperdid on koostanud põhjaliku rakendusuuringu ning sealsete tulemuste mitte arvestamine, tuues ettekäändeks, et vastavat teaduslikku mudelit ei saa ekstrapoleerida Eesti tingimustesse, ei ole kohane. Usun, et sellele indikaatorile õige riskimääratluse saamiseks peaks võtma ühendust Keskkonnaministeeriumi ja KAURi ekspertidega.

Lugupidamisega

Indrek
Tegevjuht
Eesti FSC

Lai 29
51014, Tartu, Estonia
Tel: +372 5698 5588
E-post: i.talpsep@ee.fsc.org
Skype: indrektalpsep

Talpsep

Email 18.06.2015

Tere!

Kui ca 96% materjali mahust lõigatakse harvesteridega, on ju väga lihtne risk määratleda ja konkreetne kontrollmeede välja pakkuda. Enamikul juhtudel siis ei olekski põhimõtteliselt midagi vaja teha, sest harvesteridega lõigates on kõik hästi. Samas oleks võimalik läbi selle tegeleda 4%-ga, kus risk tegelikult kõrge on. Just läbi vabatahtlike sertifitseerimisskeemide on võimalik kujundada üldisi norme valdkonnas. Ehitustööd on ka ohtlikud ja riski nulli pole võimalik viia, aga see ei tähenda, et probleemist peaks mööda vaatama.

Tervitustega

Indrek

Comments from MTÜ Eesti Erametsaliit



MTÜ Eesti Erametsaliit

Mustamäe tee 50

10621 Tallinn

erametsaliit@erametsaliit.ee

www.erametsaliit.ee

Hr. Asko Lust
NEPCon OÜ
alu@nepcon.net

Eesti Erametsaliidi seisukoht SBP riskihinnangule

Meie 22.06.2015 kiri nr 26/15

Tulenevalt Teie viimastest SBP riskianalüüsist 16.06.2015 eelnöust, soovime juhtida tähelepanu mõningatele asjaoludele selle riskianalüüsis ning avaldada arvamust riskianalüüsist eelnöu exceli tabeli kujul esitatud lisa punktides 5 ja 24 esitatu kohta.

1. Keskonnaagentuuri andmetel on Eestis arvel 8654 VEP-i (4818 vääriselupaika ja 3836 vääriselupaiga tummusega ala) kogupindalaga 21343,9 ha (vastavalt 9260,6 ha ja 12 083,3 ha). Antud andmed sisaldavad 1552 potentsiaalset vääriselupaika pindalaga 3207 ha, mis tähendab seda, et need alad ei omanud arvele võtmise ajal vääriselupaiga tummuseid, kuid hindaja arvamuse kohaselt oli neil potentsiaali saada 20 aasta perspektiivis vääriselupaigaks. Vääriselupaikade üldpindalast moodustasid nad ca 15 %. Eesti metsamaast on praeguseks enam kui 10 % range kaitse all (metsanduse arengukava eesmärk) ja potentsiaalsed vääriselupaigad ei oma enam sellist olulisust loodusväärtuste tekijajana, nagu nad olid arvelevõtmise hetkel. Minimaalselt 15 % vääriselupaikadena arvel olevatest metsadest, kuhu on võetud metsateatised on seetõttu väiksema väärtusega alad.
2. Osa VEP-e, kuhu on võetud metsateatised on raiutud seetõttu, et nad on hukkunud looduslike protsesside (peaasjalikult tormikahjustused) tagajärje. Kui vääriselupaik on loodud tunnusliikide põhjal, mis vajavad metsa varjet, siis sellisel juhul häib ka tunnusliik. Kahtlemata loovad tormimurru alad eeldusi rohket kõdupuuud vajavatele liikidele. Kuid sellisel juhul annavad parema efekti eelpool nimetatud range kaitsega alad, kus suurema pindala töttu on spetsifilist elupaika nõudvate liikide jätkusuutlik säilimine oluliselt paremini tagatud, kui väikesepindalalistel vääriselupaikadel.
3. Vääriselupaikadest asub erametsades 3932 VEP-i pindalaga 5037,1 ha, st 23,6% VEP-dest. Erametsas asuvatest VEP-dest asub kaitsealadel (siht-, piiranguvööndis või hoiualadel) 1350 VEP-i kogupindalaga 2316,7 ha. Täieliku majandustegevuse piiranguga aladel, ehk sihtkitsevööndis asub 431 VEP-i pindalaga 422,4 ha. Hoiualadel, ehk aladel kus Keskonnaametil on õigus keelata tegevus mis kahjustab ala soodsat seisundit, 331 VEP-i pindalaga 1167,6 ha, ning piiranguvööndis, kus teatud tingimustel on võimalik teostada VEP-i potentsiaalselt kahjustavat raiet, 588 VEP-i üldpindalaga 726,7 ha. Väljaspool kaitsealasid asub 2582 VEP-i pindalaga 2720,4 ha. Lepingutega on kaetud 221 VEP-i pindalaga 407,9 ha. Seega on otseste kaitse alt väljas 2949 VEP-i pindalaga 3039,2 ha, mis teeb ca 14 % VEP-de üldpindalast. Eelpool tulenevast tuleb lugeda ekslikuks ka Draft of the SBP Risk Assessment for Estonia eelnöu aluseks olev WKH Summary.xlsx tabelis toodud märkus „Situated in protected areas (in different management zones) - > this does not mean that protected“ sest nii võib käsitleda ainult piiranguvööndis olevat osa VEP-dest.
4. VEP-ide tekke eelduseks on pikaaegne vähene inimmoju. Seetõttu asuvad VEP-id enamasti looduslikult raskesti ligipääsetavates kohtades. Tavaoludes jäab Keskonnateabe Keskkuse 2011 aasta uuringu järgi erametsades ca 60 % metsateatistest raiena realiseerimata. Tulenevalt rasketest oludest, on



MTÜ Eesti Erametsaliit
Mustamäe tee 50
10621 Tallinn
erametsaliit@erametsaliit.ee
www.erametsaliit.ee

vääriselupaikadele võetud metsateatiste raiena realiseerimine töenäoliselt veelgi madalam. Eelpool tulenevast tuleb lugeda ekslikuks Draft of the SBP Risk Assessment for Estonia eelnõu aluseks olev WKH Summary.xlsx tabelis toodud märkus „Approximately 2-2,5% per year of WKH may have been cut down during last 3 years in private forests.“ sest see eeldaks raskesti ligipääsetavates ja madalama majandusliku väärtusega puistutes suuremat metsateatiste realiseerumist raieks, kui see on tavapära stes tulundusmetsades. Ka on arvestamata jäetud võimalik teatiste korduvesitamine, mistöttu võib sama eralduse metsateatis pindalaliselt korduvalt esineda.

5. Erametsaomanike nägemus oma metsa majandamise eesmärkidest on väga heterogeenne. Paljud erametsaomanikud ei ole erinevatel põhjustel oma metsade majandamisest huvitatud või pole võimalised seda tegema. Need metsad moodustavad olulise reservi vanade loodusmetsade ja tulevaste VEP-de tekkeks.
6. Erametsade pindalast on PEFC sertifikaadiga kaetud 11 %. Viimase viie aasta jooksul on PEFC sertifitseeritud metsamaa pindala kahekordistunud, ning antud protsess jätkub kiirenevas temporis. PEFC sertifikaadiga ühinemisel kohustub metsaomanik kaitsta ja säilitama oma VEP-e. Seega on eelduslikult otseste kaitse alt väljas olevatest 2949 VEP-ist pindalaga 3039,2 ha, ca 11 % kaitstud läbi PEFC sertifikaadi.
7. Tulenevalt vähesest lepinguga kaetud VEP-de pindalast on Keskonnaministeeriumi poolt 2015. aastal võetud ette samme, et selgitada välja VEP-ide tegelik olukord ja tulevikuvisionid. Sellega seoses on käsitletud VEP-ide teemat 5. märtsil 2015 teemakohasel seminaril, mille tulemusel töötakse välja lahendused VEP-ide parema kaitse tagamiseks.

Eelpool toodut arvestades seame kahtluse alla SBP riskianalüüs 16.06.2015 eelnõu excel'i tabeli kujul esitatud lisa punktides 5 ja 24 esitatud väited ning kinnitame, et risk kõrge kaitseväärtusega aladele tuleb Eesti Erametsaliidi hinangul hinnata madalaks.

Lugupidamisega,

Aira Toss

/allkirjastatud digitaalselt/

Juhatus esimees
aira.toss@erametsaliit.ee

Liina Laineveer
Tegevdirektor
liina.laineveer@erametsaliit.ee

Comments from Warmeston OÜ, Purutuli OÜ, Ardor OÜ

Ardor OÜ Warmeston OÜ

Sustainable Biomass Partnership Limited 3rd Floor, 41 Moorgate London EC2R 6PP England

15th October 2015

Dear SBP Secretariat

We, the undersigned biomass producers operating 4 facilities in Estonia, are submitting our comments for the draft Regional Risk Assessments for Estonia prepared by Nepcon in August 2015 and published on the Sustainable Biomass Partnership (SBP) webpage¹. It is our opinion that the analyses undertaken for the indicator 2.1.2 „*The BP has control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities*“ is insufficient and the risk level should be considered low for the following reasons:

1 <http://www.sustainablebiomasspartnership.org/documents/consultation-documents/draft-regional-risk-assessments>

1. Less than 1% of the total area of the WKHs are potentially harvested.

2. From 1999 to 2015 the total area of WKH's in Estonia has increased by 3.4%.

3. Risk related to WKH is managed and monitored on the state level.

Please find a more detailed elaboration further below.

The draft RRA assigned based on the information available during the risk assessment process a specified risk for indicator 2.1.2, whereas the associated risk assessment covered three areas:

- violations related to protected sites and species;
- violations related to environmental requirements;
- protection of Woodland Key Habitats (WKH).

For both of the first two aspects the risk assessment concluded: i) the protection system is functioning well; ii) there is no major risk in the area, and; iii) the recorded violations have been small scale cases. Therefore the indicator 2.1.2 has been assigned as *specified risk* based on the potential risk related to the protection of the WHK.

The RRA correctly states that based on the Estonian legislation the protection of WKH is optional for private forest owners. However the draft RRA does not undertake any further analyses under *Annex 1: Detailed Findings for SBP Indicators* to describe or assess the situation in detail, leaving it unclear what are the bases for the assigned “specified risk” and why the management and monitoring practices in place have not been mentioned and/or considered as sufficient mitigation measures.

We would like to bring to the attention of the authors and SBP that the Estonian Ministry of Environment (MoE) has published an analyses of the protection mechanisms of the WKHs on 25th August 2015². The report provides among other two statistical findings that are of high importance when assessing the risk associated with harvesting of wood growing in WKHs:

2 Keskkonnaministeeriumi analüüs VEPi kaitsemehhanismile (täiendatud 25.08.2015), <http://www.envir.ee/et/vaariselupaikade-kaitse>

3

http://www.keskkonnaagentuur.ee/failid/Metsateatisega_kavandatud_lageraiete_teostamise_analuus_2011_ortofotode_pohjal.pdf

1. The maximum area of the annually requested felling permits that overlap with the WKHs is 1% of the total WKHs area, whereas not all of the permitted harvesting is carried out in practice.

2. From 1999 to 2015 the total area of WKH's in Estonia has increased by 3.4%.

According to harvesting analyses carried out by Environmental Agency 25 to 34 percent of the areas covered with felling permits are not harvested in privately owned forests³. This data supports the findings of the MoE analyses indicating that less than 1% of the total WKH area are potentially harvested. Furthermore the various reports and available statistics demonstrate that the potential risk related to WKH is managed and monitored on a state level under the supervision of the Ministry of Environment and the involvement of Environmental Board, Environmental Inspectorate and Environmental Agency.

We do note that some aspects of the above have been partially covered in the draft RRA under Chapter 4 Stakeholder Consultations and other annexed material, but the structure of the draft RRA is misleading as not all relevant information is available under the detailed analyses in annex 1.

It is our opinion that the draft RRA has not given full regard to the above given aspects and the analyses undertaken is insufficient. In combination with the information provided by EMPL and Graanul Invest during the stakeholder consultations the risks associated with the indicator 2.1.2 including the risk of feedstock originating from WKH's ending up in biomass production should be considered low as long as the management, monitoring and inspections undertaken today are continued and there are no major changes in the monitored parameters.

Yours sincerely,

Tanel Mihkelson Board Member	Kuido Kuntro Board Member	Siim Liblik Board Member
OÜ	Ardor OÜ	Warmeston OÜ

Comments from Stora Enso Eesti AS

16.10.2015 Dear Melanie Wedgbury, We, the undersigned, are submitting our comments for the draft Regional Risk Assessments for Estonia prepared by Nepcon in August 2015 and published on the Sustainable Biomass Partnership (SBP) webpage . Our comment is to the indicator 2.1.2 „The BP has control systems and procedures to identify and address potential threats to forests and other areas with high conservation values from forest management activities“ is insufficient and the risk level should be considered low for the following reasons: 1. The indicator states potential threats to forest and other areas with conservation values, however in the draft RRA the risk is unspecified only related to Woodland Key Habitats (WKH). WKH concept in Estonia is voluntary protection on top of ordinary environmental protection areas and requirements. Only because the specified risk in draft RRA is risen from WKH, the rest of comments are about this minor part of protecting high conservation value forests; 2. Woodland key habitats are mapped and the data is public. WKH are continuously followed by authorities and since 1999 the area of WKH area has increased in current circumstances by 3,4%; 3. Most WKH are located on state land and those areas are protected. In private forests WKH area is 2760ha, from what 430ha owners have even signed WKH protection commitment. Remaining about 11% from the total Estonian WKH area. 4. WKH are not most attractive for commercial harvesting (low volume, high harvesting cost compared to other parts of forests, difficult to access, non-commercial value for FO), that means even on the properties with not officially protected WKH, the key habitat itself remains often untouched during

logging operation; 5. Companies commit not to harvest wood from any WKH (E.g. Stora Enso Eesti AS has an agreement with Estonian Fund for Nature from 2007). The draft RRA leaving it unclear what are the bases for the assigned “specified risk” and why the management and monitoring practices in place have not been mentioned and/or considered as sufficient mitigation measures.

Yours sincerely, Stora Enso Eesti AS Margus Kuusk Sustainability Manager