

**Accordance to the FSC requirements of the Estonian State  
Forest Management Centre (SFMC)**



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Member of the Social Chamber of the Estonian FSC**

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## Introduction

We hereby present an overview of various structural problems of the SFMC-s activities, whose truthfulness and severity we request the NEPCon's auditing team to inspect. We also point to specific forest plots, on which we have either discovered or have reason to suspect violations of the FSC forestry standard. Our audit handles extensive soil damage, destruction of the habitats of protected species, logging of keystone habitats or forest notifications issued on keystone habitats (the Estonian Environmental Agency is of the opinion that the SFMC will log every plot it requests a notification for), problems with the inclusion of locals at Kolga, Klooga, and elsewhere in Estonia and several other issues citizens have witnessed while performing supervision over the activities of the SFMC. For betterment of our cooperation, we'd be grateful for direct feedback, so we could interpret the FSC standard and system in a more comprehensive way in the years to come. We plan to enhance citizen supervision and start controlling FSC-certified private companies as well.

## 1. Endangering and destruction of natural values

**1.1 We suspect the SFMC has destroyed the habitat of a I category protected species on quarter KB355 plot 18,21 and quarter KB356 plot 1 and the violation of the following FSC requirements:**

6. 2 Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping and collecting shall be controlled.

6.2.6 Felling operations shall not be conducted in the nesting places and during the nesting period of rare, endangered or threatened species.

The Estonian Environmental Board affirms that the logged areas included the breeding areas of western capercaillie. Excerpt from the Forest Registry about the plots in question: „According to the Forest Act § 41 section 7 the Environmental Board controls the appropriateness of the forest notification within 15 working days and the conformity of planned logging to the requirements as stated in the legislation. The logging area is situated in the habitat of the western capercaillie (Environmental Registry code KLO9102070) on the breeding area of hens. The habitat of the western capercaillie is signified on the map added to the forest notification in blue crosshatch. The western capercaillie is specifically sensitive to disturbance (incl. logging)

on the breeding area during the breeding period of hens, which takes place from mid-April till the end of June.

**1.2 We direct attention to the fact that the SFMC has engaged in logging precious habitats (PH) and taken forest notifications on PH areas, thus violating the following FSC principles:**

PRINCIPLE 9. MAINTENANCE OF HIGH CONSERVATION VALUE FORESTS Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.

In previous years, the SFMC has logged on PH areas KB 360 plot 1, HL 131 plot 10 (information derived from an aerial photo). The Estonian Forest Aid has not inspected whether the logging has taken place yet, but we deem it necessary to include this data as well.

The SFMC-s forest notifications on PH areas:

1. quarter QE503 plot 11 volume 174 cbm; plot 13 volume 56 cubic meters (cbm).
2. quarter QE503 plot 19 volume 198 cbm; plot 21 volume 157 cbm.
3. quarter QE503 plot 3 volume 52 cbm
4. quarter QE807 plot 8 volume 211 cbm
5. quarter VP154 plot 5 volume 304 cbm; plot 8 volume 228 cbm
6. quarter KD119 plots 1 and 23 volume 543 cbm
7. quarter KD133 plots 2, 8 and 9 deforestation to create a drainage ditch 8. quarter SJ074 plot 7; SJ068 plot 9 deforestation
9. quarter SJ375 plot 14 deforestation; SJ374 plot 18
10. quarter SJ 391 plot 13 deforestation
11. quarter LD007 plot 16 deforestation
12. quarter SJ259 plot 1 sanitary cutting, volume 17 cbm
13. quarter MM669 plot 2 deforestation, volume 30 cbm
14. quarter WA060 plot 34 sanitary cutting 2 cbm
15. quarter WR228 plot 17 shelterwood compartment cutting 71 cbm
16. quarter WR228 plot 26 shelterwood compartment cutting 24 cbm
17. quarter HA159 plot 16 formative cutting 9 cbm
18. quarter HA159 plot 15 formative cutting
19. quarter HA159 plot 22 formative cutting
20. quarter AU208 plot 14 deforestation

- 21. quarter AU220 plot 3 deforestation
- 22. quarter AU241 plot 9 deforestation

In total, according to the notifications, 1200 cubic meters of wood could be logged from the PH areas. We find there should be a system that would eliminate the possibilities of taking forest notifications on PH areas and logging them.

**1.3 We suspect that the SFMC plans to establish a new drainage system in the intersection point of quarters KD214 and KD216, which is in contradiction with the following FSC requirements:**

6. 3 Ecological functions and values shall be maintained intact, enhanced, or restored, including:

- a) Forest regeneration and succession
- b) Genetic, species, and ecosystem diversity
- c) Natural cycles that affect the productivity of the forest ecosystem

6.3.5 Forest areas not affected by existing drainage ditches shall not be drained.



*Illustration 1: Forest notifications taken after Vikipalu-Pillapalu forest fire*

#### **1.4 We suspect that several important FSC requirements were unfulfilled with the clear cutting of forests near Vikipalu after an extensive forest fire this year, which created a huge clear area.**

In Summer 2018 there was a massive forest fire near Vikipalu and Pillapalu, after it was put out, the SFMC made a large number of concentrated clear cuts there (see the picture for notifications in light blue and link for video footage <https://www.youtube.com/watch?v=DqkKbbyjYaw&feature=youtu.be>)

Burnt forest is one of the greatest conservation deficiencies, which should be well known to the SFMC-s conservation department, as it was discussed in the ecology working group in the problem gathering process for the National Forestry Development Plan 2021-2030 with the SFMC representative present (see problem 39<sup>1</sup>). Following the criteria 6.4.1 the SFMC should have recognized the burned area as a key biological area and preserve it, or at least consult with specialists. Also, the creation of a large clear area right next to a nature preserve should have warranted an Environmental Impact Assessment process (criteria 6.1, indicators 6.1.1 and 6.1.6). Notably there wasn't enough retention trees left on the area (criteria 6.3.7). Forest notifications were also taken for four PH areas – AE043, 14001:003:0189 nr 6, 11, 12, 14 AE041, 14001:003:0189 nr 51, but we haven't controlled whether they were logged as well (criteria 6.4.4).

## **2. Causing of ruts**

### **2.1 We suspect that the SFMC has by means of causing deep ruts on quarter HL319 plots 9, 11 and 12 violated the following FSC requirements:**

6. 3 Ecological functions and values shall be maintained intact, enhanced, or restored, including:

- a) Forest regeneration and succession
- b) Genetic, species, and ecosystem diversity
- c) Natural cycles that affect the productivity of the forest ecosystem

6.3.9 Forwarding and harvesting by harvester shall not be done during wet spring and autumn season, in cases when soil damage can not be prevented.

In addition, this kind of logging activity leads to suspect that the SFMC is violating the following FSC requirements:

6. 5 Written guidelines shall be prepared and implemented to: control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and protect water resources.

6.5.1 Large FMO-s: FMO shall specify areas suitable for all-weather harvesting, winter harvesting or dry-weather only.

6.5.4 Measures shall be taken to minimize soil damage and erosion during harvesting operations.

**2.2 We suspect that the SFMC has caused over 500 meters worth of forest soil damage at the intersection of quarters KD214 and KD216, thus failing to fulfil the following FSC indicator requirements:**

6. 1 Assessment of environmental impacts shall be completed –appropriate to the scale, intensity of forest management and the uniqueness of the affected resources –and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations.

6.1.1 FMO shall assess environmental impacts during management planning of site disturbing forest operations and designate appropriate mitigation measures in management plan.

6.1.2 Measures to minimize negative environmental impacts of forest operations shall be followed in the field (e.g. wet soil types shall be handled with precaution to avoid soil damages, sensitive bird habitats shall not be intervened in birds nesting period etc.)

Video footage from site:

[https://www.facebook.com/EestiMetsaAbiks/posts/320470911865417?  
comment\\_id=320543935191448&\\_if\\_id=1540217781671854&\\_if\\_t=feed\\_comment](https://www.facebook.com/EestiMetsaAbiks/posts/320470911865417?comment_id=320543935191448&_if_id=1540217781671854&_if_t=feed_comment)

### **3. Uninclusive inclusion practices**

3.1 We find that the SFMC has violated the good practice of inclusion in Kolga, Klooga, Haapsalu and elsewhere, thus violating the following FSC requirements:

4. 4 Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups directly affected by management operations.

4.4.3 Large and medium FMO-s: FMO shall demonstrate that input from community participation was considered and/or responded to during management planning and operations.

4.4.4 Large and medium FMO-s: Areas of special economic, ecological, cultural or spiritual value for local communities shall be mapped and their protection values and management regime shall be documented.

2. 3 Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.

2.3.1 FMO shall not be involved in outstanding disputes of substantial magnitude in relation to the certified forest area, involving a significant number of interest groups.

2.3.2 FMO shall use mechanisms for resolving disputes over tenure claims and use rights that respectfully involve and consider the disputants in process.

2.3.3 Records shall be maintained of disputes over tenure and use rights.

2.3.4 FMO shall demonstrate significant progress achieved to resolve major disputes

The inclusion practice of the SFMC has fallen under wide criticism, as the possibilities of the local populace to affect the logging plan (preserving a part of the forest for recreative use, switching to another management technique) are very limited.

**3.2 In case of the Kolga inclusion a local has complained that the SFMC failed to comply with the written agreement between SFMC and the local community.** The local's testimony can be found here: <http://eestimetsaabiks.emaliikumine.ee/index.php/rmk-riivab-kolgalaste->



[usaldust/](#) In short, the SFMC failed to notify the locals personally a month in advance before the logging. The local, A.Blum also noted that the RMK foreman (Avo Siilak) was being rude and dismissive towards the agreement. The SFMC also failed to refrain from working at nighttime, failed to preserve trees as per agreement. It is also notable that in case of that inclusion meeting, the SFMC was relatively flexible.

3.3 In case of the logging near Klooga, the locals collected over 1000 signatures against the logging and presented them to the SFMC prior to the logging. In addition to the locals, a distinguished landscape ecologist Anneli Palo intervened, writing a challenge to the SFMC's logging plan, listing the natural values of the area and pointed that it's being intensively used as a recreational forest<sup>2</sup>. The conservation biologist suggested the area be managed with continuous cover methods. A. Palo also issued an application to the Environmental Board to have the area formally protected, and the EB started processing the application, but the SFMC did not stop the logging, claiming that it is not legally obligated to do that and that there is already a precedent of taking areas including clear cut areas under protection. This can be seen as a violation of the FSC requirements 6.4.1 and 6.4.2, as the SFMC refrained from cooperation with both a distinguished specialist and a state office whose duty is to manage nature conservation. In addition, the SFMC presented itself as incompetent in matters regarding conservation.

**3.4 The town of Haapsalu wished to ban clear cuts** within its borders, following the wishes of the local community, via the means of general planning<sup>3</sup>. Since then the SFMC with allies from the Private Forest Association has pressured the municipality to back down from its plan, among other methods also by threatening with court.<sup>4</sup> The situation also seems to violate criteria 4.4 and indicator 4.4.3.

**3.5 In case of logging the small forested area near Roobuka**, the locals explicitly brought out that that forest serves as a noise filter between the settlement and railroad, nevertheless a large part of it was logged<sup>5</sup>.

**3.6 In addition to the aforementioned cases**, the media reached several other complaints against logging in state forests, including Viimsi, Narva-Jõesuu, Kooraste and others. Those cases can also be considered a violation of indicator 9.1.2, as the logging causes psychological stress and the recreative value of logged areas decreases significantly. The SFMC fails to take into account the forest's function of blocking noise and wind, its effect on air quality and water regime and the psychological aspect, all of whose may affect the health and life quality of local citizens.

## 4. Exceeding a sustainable logging limit

According to our calculations, the SFMC fails to log within sustainable rates, thus violating the following FSC requirements:

5.6 The rate of harvest of forest products shall not exceed levels which can be permanently sustained.

5.6.1 Annual allowable cut (AAC), by area or volume, shall be set based on conservative and well-documented estimates of growth and yield.

5.6.2 FMO shall ensure that the rate of harvest does not exceed sustainable levels.

According to national forest statistics<sup>6</sup> the SFMC logged 4,32 million cbm of wood in 2017. This exceeds the target set in the SFMC-s development plan<sup>7</sup>, 4 million cbm. It rises a suspicion: whether there is no sustainable limit set, or it is not being followed. A leading specialist of the Environmental Agency, Enn Pärt, has calculated that a long-term sustainable logging volume for the entire Estonian forest is 8,4 mln cbm/y<sup>8</sup> (more conservative estimates also exist). The SFMC manages 45% of Estonian forests. If production forests and preservation forests were equally distributed between private and state forests, the sustainable yearly logging volume would thus be 3,78 mln cbm/y. However, this is not the case – 25% of the state forest is under strict protection, thus, no logging takes place there<sup>9</sup>.  $3,78 \text{ (mln cbm)} \times 3/4 = 2,835 \text{ (mln cbm)}$ . Thus, the current logging volume of the SFMC cannot be sustained permanently. The infographics shared by the SFMC itself also point to the decline of mature forests in the near future<sup>10</sup>. To achieve a more equal logging, RMK could log some trees later, especially pines that grow on fertile soils, but this is not being done.

It is also possible that the SFMC sees it's development plan target of 4 mln cbm as a median one. It could also claim that it is guided by our state policy, which allows for a maximum of 15 mln cbm/y during the period of 2011-2020. But the EFDP2020<sup>11</sup> does not aim for a permanently sustainable logging volume based on well documented and conservative estimates, but from the logic „when the forest is mature, log a lot“. This contradicts FSC indicators 5.6.1 and 5.6.2.

The unsustainability of the logging volumes of the SFMC was also brought out in the 2010 National Audit Office report<sup>12</sup>. Since the report, the SFMC logging volumes have not decreased, but increased (they used to be 2,8 mln cbm back in 2010). The state now owns 8 more per cent of the total forest area in Estonia, but this can hardly justify a more than 25% rise in logging volumes.

**4.2 We suspect that the SFMC activities endanger the spruce forest ecosystems**, which is contrary to the indicator 6.3. In Estonia, the most overlogged tree species or forest types is the spruce (Rosenthal<sup>13</sup>, Kuuba<sup>14</sup>, based on national statistics). Conservation biologists from the University of Tartu have noted the unsustainable logging in spruce forests is already taking its toll regarding spruce-related biodiversity<sup>15</sup>. In 2017, the legal logging age of fertile spruce forests was lowered by 10 to 20 years, the effect of which fell on mostly state forests. We know of no measures taken by the SFMC to reduce the overlogging of spruce forests.

## **5. Insufficient protection of natural sacred sites**

5.1 It seems the SFMC does not adequately protect the natural sacred sites and the interest groups related to them, thus violating the following FSC requirements:

9.2.3 Stakeholder consultations should indicate that FMO consistently considers and protects HCVF values.

The natural sacred sites' experts have repeatedly pointed at the insufficient protection the natural sacred sites are receiving<sup>16</sup>. This year as well, a story about a logged cross-forest reached the media, in this case, the SFMC even ignored the Environmental Board's warning<sup>17</sup>. The sacred sites' protection is further hindered by the fact most of them haven't been taken under protection due to it not being a state priority, and neither does the state allow for voluntarily marked sacred sites to appear on it's maps. The Estonian Fund for Nature has also raised the issue of inadequately protected precious habitats.<sup>18</sup>

By association, we also suspect that the following FSC requirements are being ignored:

9. 4 Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.

9.4.1 A system for continuous monitoring of HCVF values shall be incorporated into the FMO's planning, monitoring and reporting procedures.

## **6. The use of improper forest management techniques**

6.1 The Estonian Forest Aid estimates that the improper forest management techniques facilitates the proliferation of root- and fungal diseases, thus violating the following FSC principles:

10.7.1 Measures shall be taken in the forest to prevent outbreaks of pests, disease, fire and invasive plant introductions. Example: 61102:002:0205 plot 3. The spruce stumps have not been treated with Rotstop, the logging took place in a warm season. It is highly possible that root rot is being spread. The SFMC has also failed to introduce other measures to limit the spreading of root rot. The clear-cut spruce forests are still being regenerated with spruce and improvement cuts are still being made in warm seasons. Several studies by the University of Life Sciences have repeatedly dealt with the root rot issue<sup>19</sup>, and it was also specifically raised during the mid-summary of National Forestry Development Plan 2030's problem gathering

phase.

**6.2 To the best of our knowledge**, the SFMC does not require its subcontractors to cross-cut for optimal price, but tries to service each industry about equally, thus suffering constant monetary loss and failing to conform to the following FSC requirement:

5.2.1 The "highest and best use" for individual tree and timber species shall be sought

With kind regards

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Historically the forest fires, floods and wind fellings have been common natural disturbances, which have created the premises for the existence of specific species in Estonian forests (incl. ecosystems that are the result of disturbances, such as heaths). Nowadays forest fires are taken under control hastily (incl. on nature preserves), there's a tendency to avoid floods and the damaged trees and deadwood are usually removed from disturbance areas of production forests shortly. Clearcut areas fulfil the requirements of disturbance types only partially, as some of the habitat components are amiss. In strictly ecological sense, sanitary clear-cuts are unjustified.)

2 [https://eestimetsaabiks.emaliikumine.ee/wp-content/uploads/2018/10/Klooga\\_Kiri07082018.pdf](https://eestimetsaabiks.emaliikumine.ee/wp-content/uploads/2018/10/Klooga_Kiri07082018.pdf).

In short, a PH and Habitats Directive inventory is required, as is a cultural heritage inventory, the logging should be withheld until said inventories are made, and after that, there should be a decision how to manage the area and whether to protect parts of it.

3 <https://www.err.ee/854082/haapsalus-teevad-muret-rmk-lageraied>

4 <https://online.le.ee/2018/10/28/haapsalu-tegi-rmk-ja-erametsaomanikega-rahu>

5 <http://eestimetsaabiks.emaliikumine.ee/index.php/10-10-2018-teateid-metsast-rmkeirab-palvekirju-ja-raiub-inimasulate-rohevorgustikku-lagedaks/>

6 <https://maaelu.postimees.ee/4503050/metsateatiste-pohjalmullune-raiemaht-kasvas-kuid-satelliit-naitab-muud>

7 <https://www.rmk.ee/organisatsioon/trukised/arengukavad>

8 [https://www.envir.ee/sites/default/files/loppraport\\_2050.pdf](https://www.envir.ee/sites/default/files/loppraport_2050.pdf) Estonia's chances of moving towards a competitive low-carbon economy in 2050, final report, 2013, University of Tartu, Stockholm Environment Institute's Tallinn Centre and the Estonian Fund for Nature

9 <https://dea.digar.ee/cgi-bin/dea?a=d&d=JVrmkest201806.2.8.6> SFMC yearbook, 1<sup>st</sup> of June 2018

10 <https://www.rmk.ee/metsa-majandamine/loodusblogi/metsa-otsaloppemise-loputu-vaev>

11 [https://www.envir.ee/sites/default/files/elfinder/article\\_files/mak2020vastuvoetud.pdf](https://www.envir.ee/sites/default/files/elfinder/article_files/mak2020vastuvoetud.pdf)

12 <https://www.riigikontroll.ee/Suhtedavalikkusega/Pressiteated/tabid/168/557/GetPage/1/557/Year/2010/ItemId/567/amid/557/language/en-US/Default.aspx>

13 [http://www.akadeemia.ee/\\_repository/file/TEGEVUS/YRITUSED/%202017/Puidukeemia\\_2017.pdf](http://www.akadeemia.ee/_repository/file/TEGEVUS/YRITUSED/%202017/Puidukeemia_2017.pdf)

14 <https://arvamus.postimees.ee/4129493/rainer-kuuba-keskkonnaministerium-lopetagu->

avalikkuse-lollitamine

15 Deadwood-rich managed forests provide insights into the old-forest association of wood-inhabiting fungi, Kadri Runnel, Asko Lõhmus, Fungal Ecology, Volume 27, Part B, June 2017, Pages 155-167 <https://www.sciencedirect.com/science/article/abs/pii/S1754504816301179>

16 Defiled Sacred Sites, Ahto Kaasik, Tartu 2018

[http://eestimetsaabiks.emaliikumine.ee/wpcontent/uploads/2018/04/ryystatud\\_pyhapaigad\\_avaldamiseks.pdf](http://eestimetsaabiks.emaliikumine.ee/wpcontent/uploads/2018/04/ryystatud_pyhapaigad_avaldamiseks.pdf)

17 The SFMC logged a cross forest despite the warning, Ülle Harju, Southpaper, 8/23/2018  
<https://dea.digar.ee/cgi-bin/dea?a=d&d=lounaleht20180823.2.3>

18 An example – SFMC's continued destruction of precious habitats. Estonian Fund for Nature's forest blog, 9/27/2018 <http://elfond.ee/mets/naide-rmk-jatkuvalt-vaariselupaiku-havitamas>

19 [https://www.researchgate.net/publication/237810881\\_Juurepessu\\_levimisest\\_Eesti\\_metsades](https://www.researchgate.net/publication/237810881_Juurepessu_levimisest_Eesti_metsades); <https://www.etis.ee/Portal/Publications/Display/e838cc78-977c-449c-83a1-3b2e3bd6924c>, and elsewhere.