

STATEMENT REGARDING NEPCON'S EXECUTIVE DIRECTOR [PETER FEILBERG'S RESPONSE](#) TO 313 ESTONIANS' [LETTER TO THE DANES ON THEIR USE OF BIOMASS](#)

Disclaimer: this statement does not aim to represent the views of all signees of the original letter.

To say the least, in their response, NEPCon has exposed itself as a body which is not neutral, as a provider of sustainability certification services ought to be, but firmly on the industry's side, acting as its PR wing. That 'calls to question' as we like to say in polite company, the relevance, independence and impartiality of every certification scheme overviewed by them, of which they are a main provider in the region. The fact that they are supporting pellet industry which is the very industry that the EU's most authoritative scientific body, EASAC, has been [consistently critical](#) of for years puts them functionally in the same boat with climate deniers. The fact that they disregard all criticism regarding current forestry practices in Estonia means in practice that they disregard all environmental sciences and thus the concept of sustainability in the sense of the Rio de Janeiro conventions of sustainability. Therefore NEPCon should be disqualified from providing sustainability certification services without delay.

I will now dissect Peter Feilberg's claims about Estonian forestry to show how this conclusion came about.

1. "Estonia is the size of Denmark, yet half of the country is covered by forest. At the same time, forestry practices in the country are subject to significantly stricter requirements than in Denmark, and since World War II, Estonia has had a constant forest growth. I do not recognize the picture drawn in the letter at all," says Peter Feilberg.

About half of Estonia's terrestrial area is covered with 'forest land', which is a legal land use category and does not in any way inform about the ecological quality of said areas or even whether they constitute a forest in the ecological sense at all. According to the [Article 17 National Summary Factsheet – Estonia](#), only 20% of Estonian forest habitats are in favourable condition, which in turn only accounts for our close-to-nature forests or the Habitats' Directive Annex 1 forest habitats (according to Statistical Forest Inventory 2018, 11,8% of Estonian forest land). In addition, a [recent study](#) published in the Nature magazine shows an 85% increase in forest harvesting in Estonia during the 2016-2018 period compared to the 2004-2015 period, which makes it the European leader in forest harvesting increase. At the country's forestry development plan process, the problem titled 'forest harvesting levels are at a level which is harmful to biodiversity due to changes in forest age structure and might be harmful to other ecosystem services' was voted the [most important problem](#) by the participants of the problem gathering phase. Feilberg discards all this information. By association, if he is saying there are no serious problems in Estonian forests, there are no serious problems in the forests of the entire EU. By doing that he contradicts [official reports](#) by the EU Commission.

2. “Estonian forests are currently growing by about 16 million cubic meters annually, while only about 12 million cubic meters are felled. This means an annual growth of 3-5 million cubic meters.”

This statement is in perfect harmony with the official position of our government. On [April 13th 2017](#), the Lead Researcher of Conservation Biology at the University of Tartu, Asko Lõhmus, described the ideological framework of the Ministry thus in front of the Estonian Parliament:

“What we have here is a simplification of forestry to three keywords, which are the general increment of wood, logging volume and planting. Sometimes it's funny, usually it isn't. It is most certainly not balanced forest management.”

In addition, the 16 Mm³/year increment value also

- includes strictly protected areas, which are not managed
- does not account for the fact that one cannot log all of the increment – in the economic sense, 70-80 per cent of the increment can technically be harvested, regarding biodiversity, it would be best if [no more than 55%](#) of the harvesting volume which does not diminish the forest reserve would be logged.
- The 16 Mm³/y increment figure has been [called to question](#) by the Estonian State Audit Office, as the figure used to be 14 Mm³ before the 2015 Statistical Forest Inventory methodology change, which far exceeds the normal statistical error
- The State Audit Office also suggested the Estonian Forestry Development Plan until 2020 [be rejected by the Parliament](#) as it does not prescribe a sustainable forest use. It was not rejected however and currently prescribes a maximum harvesting volume of 15 Mm³/y – almost double the amount that has been deemed sustainable by the [Estonian forest policy frame document](#). As of now there is no actual tool to enforce any harvesting limit as the harvesting volumes are not monitored in real time but with a 1,5 year lag.

„In addition, Estonia has a well-developed network of protected forest areas, which make up about 25 percent of the total forest area. Of this, 14 per cent is designated as untouched forest, which corresponds to more than half of the Danish forest area or 3 times the size of the Danish state forests. In the untouched forest, large amounts of dead wood are built up for the benefit of the forest biodiversity,” says Peter Feilberg and adds:

“It is quite unique, not only at a European level, but also globally.”“

While that statement is generally true, it fails to account for the facts that

- strict protection has become the only way to reliably protect a forest
- unsustainable logging damages a larger forest area just as well as a smaller one

having 14% of strictly protected forest is not a substitution for a sustainable forestry policy. Having one of the EU's highest percentage of strictly protected forest areas fails to balance also having one of the EU's most intensive forest economies

“Biomass is certified” (...)

Here I will once again quote the Estonian Fund for Nature's [opinion](#) on Graanul Invest compliance with Verification Protocol for Sustainable Solid Biomass SDE:

„As an overall comment, we condemn the approach where biomass sustainability is justified on the basis of Sustainable Forest Management criteria alone. Those do not reflect or mitigate the adverse climate impacts of wood-based energy as highlighted by many scientists (as in an Open Letter by 800 scientists http://www.pfpi.net/wp-content/uploads/2018/04/UPDATE-800-signatures_Scientist-Letteron-EU-Forest-Biomass.pdf). The biomass harvest and exports from a country that is [losing its carbon sink](#) and is on the course of decline in forest carbon stock is not sustainable in climate perspective, even if criteria is met on forest unit level. Nor is it sustainable from the perspective of protecting biodiversity of forests: Estonian forest bird numbers are in decline and most forest habitat types are in unfavorable state despite the huge area covered by different existing certification schemes. These observations apply to certification based on Chain of Custody risk assessment and that based on a series of detailed management practices descriptions on a forest unit level alike. Both turn a blind eye on wider problems this new industry brings to forest management in general. Biomass demand brings unnecessary economic stimulus for intensification in forestry and creates pressure on forest ecosystems that national legislation, PEFC, SPB and FSC are unable to address. PEFC and SPB measures are unsatisfactory in all ecological sustainability aspects, while FSC and has been shown to not safeguard important carbon aspects of forest management and has performed poorly in some biodiversity issues.“

We can deduce from the above that NEPCo is firmly on the side of the forest industry and therefore is unfit to provide sustainability certification services. I call upon every certification scheme to sever business ties with them to show that they stand on the side of science and sustainability.

Thank you for your attention.

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