

**The Estonian Ministry of Environment spreads
misinformation and allows logging in sites of nature
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Report

The Estonian Ministry of Environment spreads misinformation and allows logging in sites of nature conservation value

"A total of 11,869 logging licences covering a total area of 11,605.41 hectares were in force in Natura 2000 areas as of 10.06.2021, and in habitats of protected species, including outside of protected areas as of 29.06.2021.

In the period 2011–2020, logging licences have been issued for all types of felling on a total of 94,000 hectares, but we would like to draw attention to the fact that this may include different types of felling at the same location and that only a part of these logging licences will be actually used," the Ministry of Environment wrote in a [letter](#) addressed to the Foundation of Environmental Information (FEI) on 14.07.2021.

"At the moment, we cannot confirm whether all the activities related to the authorisation of felling in Natura 2000 sites have been carried out sufficiently and correctly. The outcome of the infringement procedure will have to provide the answer to this question," stated Taimo Aasma, Head of the Nature Protection Department at the Ministry of Environment. (Harju, 19.07.2021 or 27.07.2021)

An analysis by the independent Foundation of Environmental Information (FEI) found that as of 11 June this year [2021], more than 635 000 cubic metres of timber was harvested from protected areas, of which more than **half a million cubic metres originated from Natura 2000** sites. Although the Ministry of Environment claims that there is no felling in Natura 2000 forest habitats with strict protection, the analysis of the FEI found that 254 hectares of state forest and 1 074 hectares of private forest were subject to logging licences as of June this year. In total, according to the logging licences in force, nearly 95 000 cubic metres of wood are currently being harvested in Natura forest habitats of pan-European importance.

On 9 June this year [2021], the European Commission called on Estonia to bring its national legislation into line with the EU's Habitats Directive (Directive 92/43/EEC) and the Strategic Environmental Assessment Directive (Directive 2001/42/EC) – in particular as regards logging in Natura 2000 sites. The Commission has identified 217 conservation regulations in Estonia that have been adopted without an environmental impact assessment as required by EU law (European Commission, 09.06.2021). Although the Deputy Secretary General of the Ministry of Environment, **Marku Lamp**, has claimed that there is no logging taking place in forest habitats of Natura 2000 protected areas, the analysis of the FEI proved the opposite (Table 1).

Table 1. Areas and felling of protected natural sites

	State forest (ha)	Private forest (ha)	Total (ha)
Protected areas (nature protection, landscape conservation, national parks)	276 800	78 013	354 813
Logging permits valid in protected areas as of 11.06.2021	2 236	6 042	8 278
Area of Natura 2000 forest habitats (in hectares)	146 726	29 118	175 844
Logging in forest habitats as of 11.06.2021	253	1 075	1 333
Logging in forest habitats as of 17.09.2021	212	1 139	1 351
Natura 2000 forest habitats felled in 2010-2020			15 000 ha

Source: Analysis by the Foundation of Environmental Information based on EELIS and Forest Registry data (11.06.2021).

"Natura 2000 sites are protected domestically under the Nature Conservation Act, and the conservation objectives of Natura 2000 sites are taken into account when drafting the conservation regulations. In addition, no logging will be carried out in Natura habitats of protected areas on state land – neither in the special protection zone nor in the restricted zone," Deputy Secretary General of the Ministry of Environment Marku Lamp confirmed in a [press release](#) of the Ministry of Environment on 11 June.

Thus, Lamp makes false statements to conceal the fact that logging in Estonia is taking place in nature protection areas, Natura 2000 habitats and habitats of protected species.

A journalist for the daily *Postimees* asked Aigar Kallas, Chairman of the Management Board of the State Forest Management Centre (*Riigimetsa Majandamise Keskus - RMK*), whether RMK would suspend logging in Natura 2000 areas for the duration of the European Commission's infringement procedure. "What Marku Lampi said is still true – for RMK, Natura habitats are areas where no felling will take place /--/ no infringement proceedings have been initiated against RMK, so we do not plan to act differently from the current situation," Aigar Kallas replied to the journalist. (Harju, 19.07.2021 or 27.07.2021).

According to the analysis of the Foundation of Environmental Information, the total area of Natura 2000 forest habitats in private forests in Estonia is 29,118 ha (Table 1), of which 1,075 ha are allowed to be felled in private forests as of June 2021 (Table 2). This means that 3.7% of the Natura sites with strict pan-European protection on private land will be cleared in 2021.

The Ministry of Environment allows the cutting of hundreds of thousands of cubic metres of forest from nature protection areas every year.

Table 2. Logging licences issued for protected areas (in hectares and cubic metres)
11.06.2021

	State forest (ha)	Private forest (ha)	HECTARES IN TOTAL	TOTAL CUBIC METRES
PROTECTED AREAS	2236	6043	8278	635 959
NATURA 2000 SITES	1687	4875	6563	512 487
PERMANENT HABITATS	578	611	1190	77 168
CONSERVATION AREAS	288	522	810	50 944
NATURA 2000 FOREST HABITATS	253	1075	1333	94 690
KEY HABITATS	20	21	41	3 136

Source: Analysis by the Foundation of Environmental Information based on EELIS and Forest Registry data (11.06.2021).

Logging licences authorising felling are checked and approved by the Environmental Board, which says it receives regulations and guidance on felling in protected areas from the Ministry of Environment – mainly verbally from Deputy Secretary General Marku Lamp or Marika Erikson, the representative of the Protected Areas Regulatory Committee.

"Felling in protected areas is taking place because the current legal framework allows it," admitted Leelo Kukk, Deputy Director General of the Environmental Board, referring to the fact that the Board can consider anything, but the laws developed in the Ministry of Environment do not allow refusing to issue logging licences for Natura 2000 areas. (Harju, 19.07.2021 or 27.07.2021)

"Let us clarify that Marku Lamp's reply was about felling for economic purposes. RMK does not carry out felling for economic purposes in special protection zones, nor in habitats of restricted zones," said Taimo Aasma, Head of the Nature Protection Department of the Ministry of Environment. (Harju, 19.07.2021 or 27.07.2021)

At the same time, large-scale logging is taking place in nature protection areas, Natura sites, forest habitats and also in habitats of endangered species. An analysis by the Foundation of Environmental Information (FEI) revealed that nature is not protected in nature protection areas: currently, there are 9,832 logging licences in the forest register in nature protection areas, covering an area of 8,289 hectares, with a wood volume of 636,229 cubic metres. (Data source: Forest Registry > Valid Logging Licences as of 11 July this year: <https://keskkonnaamet.ee/elusloodus-looduskaitse/metsandus/metsateatis-ja-metsaregister>).

Of all the planned felling in areas protected under the Nature Conservation Act, 6,562 hectares are located in Natura sites of international importance (Table 3), where more than 500,000 cubic metres of timber will be felled. Subsidies have been both requested and received for the same areas to alleviate economic constraints for landowners.

As of 17 September this year, 6,624 hectares of all planned felling in areas protected under the Nature Conservation Act are located in Natura sites of international importance (Table 3).

Table 3. Felling authorised by logging licences in Natura 2000 sites (bird and nature areas) located in nature protection areas as of 11.06.2021 and 17.09.2021.

Logging method	State forest (ha)	Private forest (ha)	Total
deforestation	27.54	102,36	130,43
logging for building infrastructure	2.67	3,26	5,93
clear-cutting	47.06	553,63	600,68
shelterwood cutting as narrow strips	4.12	250,2	254,32
uniform shelterwood cutting	42.41	1144,82	1191,43
shelterwood cutting as patches	0.00	42,7	42,7
thinning	457.05	1488,86	1945,91
selective logging	0.00	37,76	37,76
maintenance logging	291.80	967,27	1259,07
logging for achieving conservation goals	803.01	284,43	1094,4
Felling authorised with logging licences in Natura areas; based on data from the Forest Registry - total area (in hectares) 11.06.2021	1675	4875	6562
Logging plan according to logging licences (in cubic metres)	129 717	382 770	512 487
Felling in Natura areas authorised by logging permits; based on data from the Forest Registry - total area (in hectares) 17.09.2021	1620	5004	6624

Source: FEI analysis based on EELIS and Forest Registry data (11.06.2021 and 17.09.2021).

Among the Natura sites to be logged, large-scale logging is taking place in forests of high conservation value – 1,333 hectares in Natura habitats, 1,190 hectares in permanent habitats and 41 hectares in key habitats (Table 2). In addition, thousands of hectares of sites and habitats of protected species in categories 1, 2 and 3 are being felled – both on private and state land (Table 4). Intensive economic activity, by destroying habitats, worsens the situation of most species and makes conservation management more difficult.

At present, logging permits are in force in habitats of protected species, allowing 213,210 cubic metres of timber to be felled on nearly 3,000 hectares (Table 4).

Table 4. Logging habitats of protected species

Logging in habitats of protected species	HECTARES	CUBIC METRES
Species I	118.20	7,780.78
Species II	2,146.44	152,362.68
Species III	716.44	53,067.17
Total	2 981	213 210

Source: FEI analysis based on EELIS and Forest Registry data (17.09.2021)

A 2019 study by the Environment Agency (KAUR) highlighted that "An analysis of satellite monitoring of forest loss found that 3,589 ha (18% of inventoried habitat area) have been cleared in inventoried forest habitats during the last reporting period (2013–2018)" (Ministry of Environment, 30.06.2021). The analysis of logging licences (regeneration felling + deforestation) found an overlap of 10,646 ha (52% of the inventoried habitat area) between regeneration felling and deforestation during the same period. Based on satellite monitoring of forest loss, it was concluded that 1,034 ha of habitats have been lost in the protected areas over the last six years." (Environment Agency, 2019). Despite of the result of this study, which already indicated the loss of protected species and habitats due to intensive management, KAUR has failed to communicate the necessary signal to the Ministry of Environment and RMK. An analysis by the independent Foundation of Environmental Information (FEI) confirmed that protected areas are not protected and highlighted in more detail how protected areas are threatened primarily by intensive forest management, also rebutting the claims by top government officials in the process.

SA Keskkonnateabe Ühendus / *Foundation of Environmental Information*

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Sources:

1. European Commission (09.06.2021), *Juuni rikkumisvastaste meetmete pakett: peamised otsused*. Euroopa Liidu ametlik veebisait: https://ec.europa.eu/commission/presscorner/detail/et/inf_21_2743.
2. Environment Agency (2019), *Ülevaade loodusdirektiivi metsaelupaikade seisundist (2013 - 2018) elupaigainventuuride ja seireandmete põhjal*. Keskkonnaagentuuri eluslooduse osakond.
3. Ministry of Environment (14.07.2021), Keskkonnaministeeriumi vastus Keskkonnateabe Ühenduse avalikule kirjale: *Vastus avalikule kirjale raiete osas riigimetsa piirang- ja sihtkaitsevööndites*. allikas: <https://ktu.ee/2021.07.14%20KeM%20vastus%20raiate%20asjus%20Taimo%20Aasma.pdf?dl=0>
4. Ministry of Environment, (11.06.2021), *Keskkonnaministeerium: Eestil on head seadused metsade kaitseks*, allikas: Keskkonnaministeeriumi kodulehekülg/Uudised: <https://envir.ee/uudised/keskkonnaministeerium-eestil-head-seadused-metsade-kaitseks>.
5. Ministry of Environment, (30.06.2021), Elusloodus: Eluslooduse analüüsid. Allikas: Keskkonnaministeeriumi kodulehekülg/Elusloodus: <https://keskkonnaagentuur.ee/analused-ja-indikaatorid/analused/elusloodus>.
6. Lamp, M. (21.06.2021), *Marku Lamp: looduskaitsest avatud silmadega*, allikas: Postimees/Arvamus: <https://arvamus.postimees.ee/7276593/marku-lamp-looduskaitsest-avatud-silmadega>
7. In English
Harju, Ü. (27.07.2021), *Estonia looking at €100,000 fine for clearcutting protected areas*. Postimees. <https://news.postimees.ee/7302451/estonia-looking-at-100-000-fine-for-clearcutting-protected-areas>
8. In Estonian
Harju, Ü. (19.07.2021), *Eestit ähvardab kaitsealade paljaksraiumise eest trahv 100 000 eurot päevas nagu Poolat*. allikas: Postimees: <https://leht.postimees.ee/7296766/eestit-ahvardab-kaitsealade-paljaksraiumise-eest-trahv-100-000-eurot-paevas-nagu-poolat>

Methodology of the analysis

Table used for the analysis:

https://docs.google.com/spreadsheets/d/1PPgWizu4cHeIS8eR_th6Ftlfs2lai0Mo/edit#gid=434243903,

which is based on data from the Forest Registry:

<https://keskkonnaamet.ee/elusloodus-looduskaitse/metsandus/metsateatis-ja-metsaregister>, valid as of 11.06.2021.

We used the QGIS software, created a new blank layer, selected all the areas protected under the Nature Conservation Act (protected area, conservation area, permanent habitat, local protected area, individual objects, Natura site, protected species). We compared the

map layers of protected areas with the active logging licences (valid 1 year). We excluded all logging licences that were outside the protected areas. Only these licences that were within or partially overlapped with the protected area layers were included in the calculation. For the partially overlapping ones, we performed an additional calculation where, on the basis of proportionality, we calculated only the volume inside the protected area (671,301 cubic metres remained after the correction calculation, out of an original volume of over 700,000 cubic metres).

Annex 1

Forest land and area of protected areas on forest land

Total area of forest land	2 345 989 ha
Forest land in protected areas	464 217 ha
Forest habitats in protected areas	211 929 ha
Forest land in Natura 2000 sites	364 587 ha
Forest habitats in Natura 2000 sites	205 809 ha

Source: EELIS (Estonian Nature Information System - Environmental Registry): Environment Agency 23.07.2021
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