

## Overview of the stakeholder comments made to the PEFC Estonian Forest Management Standard from 2010 to 2012

The proposals for revisions and modifications of the draft standard were received in Estonian. Due to several significant changes in the structure of the draft standard it is not possible to cross-reference recommendations and specific indicators. The synopsis gives an overview of the nature and content of substantive comments and proposals that were presented during the standard elaboration process. The synopsis does not cover recommendations and revisions related to grammar.

Stakeholder	Comment/Proposal	Response by EMSN
State Forest Management Centre	Proposal to include a summary of forest works and a general plan to be made available to interested persons.	The wording of the indicators revised
	Proposal to formulate separate requirements for large-scale forest manager regarding forecast of 10-year activities and changes in the growing stock, estimate of the condition and development need of forest roads.	Separate indicators introduced to the standard for large-scale forest owners.
	Proposal to revise requirements on tending of young stands and to put focus on the desired outcome rather than a mechanical tending plan.	Formulation of the standard revised.
	Request to clarify the meaning of good condition of stand after thinning operations. Sanitary condition and ecological condition may have different meaning and interpretation. For good ecological condition, it is necessary to maintain ecological structures, such as dead wood and snags in the forest. For good sanitary conditions such elements are often considered as threats and are to be removed.	The wording of the standard improved and explanation given for both economic and ecological quality.
	Recommend to add specific examples to the standard on the biologically valuable structural elements as well as valuable landscape elements to be preserved during regeneration felling.	Examples of biologically valuable elements added to the standard.
	Propose to specify the what qualifies as a sufficient reason to limit public access to forest.	Specification added to the standard.
	Request to clarify if the requirement to undergo training on sustainable forest management at least once in 5 years applies also to subcontractors.	Clarification added to the standard.
	Suggest to leave conversion out of the standard, because the conversion according to national legislation is not initiated by or decided upon the preferences on interests of forest owners/managers. Forest conversion is sufficiently regulated by national legislation.	Despite the sufficient regulation of conversion by national legislation, it is kept in the standard, because it is required by PEFC normative documents.
	Suggest to leave cattle grazing out of the standard, because it is not an issue on forest land.	Standard revised.

	Suggest to leave a requirement to facilitate the development of semi-natural habitats and secondary forests as these are sufficiently regulated by nature conservation legislation.	Standard revised.
<b>University of Life Sciences</b>	The definition of the term ecological network is provided in the standard but the term itself is not used in the standard. If it is not used then the definition is irrelevant the standard.	The term is kept in the standard as a framework explaining how different conservation values form ecological backbone to the sustainable forest management.
	Why is it required in the standard that the objectives of forest management, estimate of forestry works etc have to be publicly available?	It is a requirement of the PEFC that a summary of the management plan is made available to public.
	Recommend to require compliance with applicable legal acts rather than laws as it is formulated in the draft standard, the term laws does not encompass all applicable types of legislation.	Wording of the standard revised where applicable.
	Propose to revise the wording on maintenance of young stands. Instead of requiring that young stands are maintained in accordance with a plan, the requirement should stipulate that tending of young stands should be carried out so as to comply with the end goal of the stand.	Wording of the standard revised.
	Requirement that tending young stands should facilitate development of mixed stands is contradictory to the requirement that the productivity of stands is maintained when speaking of fertile soils. Recommend to reformulate.	Wording of the standard revised.
	In several indicators, the draft standard describes activities of the forest owner or manager that are permitted. In the local legal system there is a common principle, that activities that are not forbidden by law, are permitted. Recommend to reformulate.	Descriptive indicators rephrased and kept in case they have normative meaning.
	Indicators related to forest regeneration, forest drainage and forest productivity should be revised. Current versions are not formulated in line with sustainability principles and are contradictory in some aspects.	Whole set of indicators revised to better comply with the principles of sustainable forest management.
<b>Estonian Forest Society</b>	Better definition is needed for the term plantation. Is planted, spruce dominated, but mixed forest a plantation? Or is it meant that plantation consists of e.g. hybrid aspen stands on agricultural lands?	Definition revised to comply with national legislation.
	What kind of information has to be included in the public summary of forest works? What period should this information cover and how should it be made available to interested persons?	It is not elaborated further in the standard, because it is common practice of certified organisations/individuals to make such summaries publicly available.
	Are cultural heritage objects included in current forest management plans and is such object defined	It is required that such objects are covered by the forest

	somewhere?	management plan of certified operation. In case such information is not typically included in forest management plans, it will have to be added to comply with the standard.
	What information has to be included in the evaluation of the condition and development need of forest roads?	The standard is flexible and it is up to forest manager/owner to determine how it evaluates the condition of roads and the development need of the road network.
	Where is it defined which tree species are appropriate for planting in reforestation of specific site types?	It is regulated by a ministerial decree based on local forest act.
	Would the results of monitoring the quality of forest regeneration have to be in some specific report format and available to certification organisation?	The standard will not include forms for monitoring.
<b>Estonian Private Forest Union</b>	It is required that the forest inventory data cannot be older than 10 years. What about protected areas without management?	The requirement applies to managed forests.
	The standard requires that thinning is not too intensive. Thinning intensity is regulated by local legislation and such indicator does not belong to the standard.	Indicator removed from the standard.
	Suggest to remove forest conversion indicators from the standard, because process of conversion regulated by legislation and forest manager does not have a decisive role in it.	EMSN recognises the merit of the suggestion, but since the matter has to be covered by the standard, it is kept.
	The requirement to apply forest protection measures to prevent spread of fungal diseases is too narrow. There are other types of pathogens in the forest that need preventive measures, too.	More generic term – pest – was adopted to the standard.
	There are requirements for large-scale forest owners in the standard, but the threshold for large-scale forest owner is not defined.	Threshold added to the standard.
	If plantations are, as per definition, only located on non-forest land, then what is their connection to the standard?	Conversion of natural forests to plantations is not permitted according to the standard and the definition explains the meaning of plantations.