

Fellings and protection of natural values in protected forests

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will protected natural values remain?*

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Summary of audit results

According to the National Audit Office, the Ministry of the Environment has not organised the protection of protected forests in such a way as to ensure the preservation of the **natural values** of these forests.

For your information

Natural value is a collective term that denotes a plant, animal, bird, or other species that is either rare or plays an ecologically important role, as well as their **habitats** (the set of natural conditions required for the species to live in that place), forest habitat types (western Taiga, bog woodland etc.) or also a landscape that is aesthetically pleasing to humans.

Every protected forest is protected to preserve certain natural values.

The European Union Nature Directive aims to protect endangered and rare habitats and species across Europe. For their protection, the network of Natura 2000 areas of the European Union (so-called **Natura areas**) has been created.

In order to ensure the preservation of the natural values in these forests, the Ministry of the Environment needs to significantly improve the clarity, adequacy and timeliness of data concerning the field. There is currently no reliable overview of how much forest is under protection. It is also not known to what extent the protected forests have been cut, because the Ministry and the Environmental Board do not collect this information. At the same time, this information would be important to assess the impact of fellings on the protected forests.

The Environmental Board has allowed fellings in the protected areas without knowing how much the fellings that have already taken place have combined to affect the protection objectives. The expert work ordered during the audit (ten cases were analysed) showed that the natural values of limited management zones and special conservation areas have been damaged in the observed cases.

In an audit published 15 years ago¹, the National Audit Office already led attention to the fact that the protection of forest habitats in need of nature conservation has not been organised in a way that would ensure their favourable condition. Most of the issues raised at the time are still unresolved.

Main audit observations

It is unclear how much forest is under protection. The data on the surface area of the protected forests displayed to the public by the Environment Agency do not give a clear or adequate picture. In order to clarify the extent of the error, it would be necessary to thoroughly analyse the map data and agree on a methodology for finding the surface area. In the administrative area of the Ministry of the Environment, there is no agreement on which definition of "forest" should be the basis of data analysis. The data in the Estonian Nature Information System can be interpreted in different ways, which in turn makes it easy to make

¹ Protection of valuable forest habitats in the Natura 2000 network areas. Report of the National Audit Office of Estonia to the Riigikogu, 28/05/2008

mistakes in the data analysis and show the surface areas of forests differently.

Since the effects of forest management are not sufficiently described or evaluated in the conservation regulations and protection management plans, the Environmental Board does not have all the necessary information to decide whether felling damages natural values. Not all protected areas have protection management plans. The Ministry of the Environment considers the Statistical Forest Inventory (SMI) data to be sufficient both for the general organisation of forestry and for the organisation of forest protection, but these data reflect the situation two years ago and do not provide information about felling of the protected forests.

Conservation regulations have been amended to allow clear cutting of up to two hectares in limited management zones. (In 2022, clear cutting was permitted in 173 of the 189 limited management zones of a protected area with forest².) As a result, it is allowed to clear large areas in forests that are close to each other with different felling techniques, and it is possible to manage forests in the limited management zone that is under protection in a similar way to forests that are not under protection. Direct information about how fellings affect the ecosystem of the protected forest is not collected as part of environmental monitoring, during the preparation of protection rules or protection management plans. It is also not analysed when approving felling permits in protected areas.

Environmental monitoring data show the deterioration of the condition of several plant, animal and other species in the protected forests, but the Environment Agency and the Environmental Board have not found out the reasons for the deterioration. Since the relationship between deforestation and deterioration has not been evaluated, the Ministry of the Environment did not see sufficient justification for limiting felling in protected areas until the initiation of the European Union's infringement procedures.

The fact that the felling permits have been given in conflict with the protection objectives also contributes to the deterioration³, and the permits do not set the necessary restrictions for the protection [of the species or habitat](#). The cases analysed in the expert work show mistakes, the repetition of which is not excluded in other cases when it is desired to cut the protected forest.

The surface area objectives for taking [Natura habitats under protection](#) **have been met in Estonia, but the condition of the old forest as a habitat is poor or insufficient.** According to the assessment of both the European and Estonian Environment Agency, large-scale clear-cutting affects the biodiversity of forests the most, and in the case of Estonia, it is noted that both the total surface area and volume of felling has consistently increased in the last decade.

² 2021 data.

³ Here and in the future, the word "felling permit" is used instead of "forest notification" for the sake of clarity.

Natura's private forest subsidies should compensate for the restrictions on felling and thereby help to ensure protection, but their payment currently does not depend on whether and how much forest is left in the protected area. The subsidy is also paid for clearcut areas, and the preservation of the habitat is not a prerequisite for the payment of the subsidy. Although the purpose of the subsidy should be to compensate for lost income, the level of subsidising does not depend on how much income can be obtained from the forest.

The methodology used in the transfer of lands with nature conservation restrictions to the state is not clear and creates an unequal situation for the transferors of the land. In order to maintain a balance between the interests of nature conservation and the private owner's forest management, an opportunity has been created to transfer nature conservation lands to the state, but the criteria for the transaction with the state are not clear, and the parties are not clear about the circumstances that are taken into account when calculating the purchase price when the sale price is formed.

What did we recommend as a result of the audit?

In order to ensure better information about protected forests and felling there, and to achieve good condition of these forests, the National Audit Office recommends:

- create an application for the Forest Register to record felling in protected areas and the ability to search for data by both the protected areas and their protection regimes. In addition to the Estonian Nature Information System, data from the Estonian Topographic Database should be used in the statistics of the surface area of forests in protected areas;
- develop the Forest Register in such a way that the forest owner submits a report on the realisation of felling permits. If there are restrictions, conditions or recommendations on felling in the felling permit, it would be important to request an overview of their implementation.
- to ensure that before approving a felling permit in a protected forest, the impact of felling on natural values is assessed, planning of felling takes place in protected areas considering the entire area, and the cumulative impact of felling is taken into account when granting felling permits;
- analyse the impact of clear cutting on the ecosystem of protected forests and, if necessary, allow these forests to be managed as a selection forest.

The answer of the Minister of the Environment and the Director General of the Environmental Board to the National Audit Office: in order to get a more accurate overview of the activities that took place in the protected areas (including to evaluate the impact of Natura and the effectiveness of protection), it is necessary to create data collection solutions. Risk points are the uneven quality of the data, the increase in bureaucracy and the emergence of additional costs.

The Ministry of the Environment has prepared an amendment to the Nature Conservation Act, which will simplify the assessment of the

effects of Natura. In addition, the Environmental Board plans to prepare a protection management plan for Natura 2000 forest habitats and to analyse the cumulative impact of felling and standard situations within the framework of its strategic environmental impact assessment. Proposals related to the spatial planning of felling and selection forestry need a more detailed analysis, and this can be done in 2023.