

LETTER TO THE DANES ON THEIR PART IN THE OVERUSE OF ESTONIAN FORESTS

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Denmark prides itself over being among the climate leaders.

However, the Danish government has not "united behind the science" on the question of woody biomass. The European Commission's own scientific advisory body [limits sustainable biomass use for energy](#) to local wood and using wood waste and residues. Denmark is the largest buyer of wood pellets produced in Estonia. These are not local, and Graanul Invest, the largest pellet producer in the EU, openly admits that it uses whole trees and waste/residues in a 1:1 ratio, while the ratio itself has not been verified.

The Estonian Fund for Nature, one of the most well regarded and active Estonian environmental NGOs has [expressed its opinion](#) about the supposed sustainability of the pellet trade:

"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."

The Brussels-based sustainable forest policy organization Fern [recently described](#) the current Estonian forest policy thus:

"Estonia is logging its forests at a rate that would reduce its forest sink by more than a half." - referring to if the current harvesting levels were maintained over the next decade -- both the industry's representatives and state's development plans support an even greater volume.

Estonia is, in fact, one of Europe's most intensive forest economies. As the EU Commission has pointed out that the entire EU-s forest sector is not sustainable neither [climate-](#) nor [biodiversity-wise](#), it follows that in Estonia these problems would be seen most intensively. And indeed, there has been [over three years](#) of intense public opposition to the extant forest policy.

It is widely agreed that the sustainable harvesting level for Estonian forests is around 8 million cubic meters per year. The Estonian Environmental Agency estimated in 2013 that the maximum sustainable logging volume (doubles for a climate neutral logging volume in that equation) for Estonia is 8,4 Mm³. The Estonian forest policy frame document from 1997 states it as 7,8 Mm³. An impact assessment ordered by the Estonian Ministry of the Environment

and conducted by the Stockholm Environmental Institute Tallinn put it at 8 Mm³, this time regarding the conservation status of Natura species in Estonia (the impact assessment was [rejected by the Ministry](#) as 'centered on the aims of protecting the climate and biodiversity').

However, Estonian logging volumes over the last 10 years have been 10,7 Mm³ on the mean, reaching 12,5 Mm³ in 2017 and 2018. This is widely regarded as a serious problem in Estonia on various levels, starting with the locals whose life environment is changed beyond recognition and ending with purely economic concerns which the unsustainable use of a sustainable resource brings.

As four million cubic meters of our forest is exported for biomass yearly, and in the recent years Denmark has been importing over 50% of our pellet produce, this makes Denmark to a high degree complicit in the destruction of our environment. In fact, the Danish taxpayers' money is being used to fund it, albeit indirectly, through tax exemptions rather than direct subsidies, with the effect however being the same - a needlessly carbon and land area intensive energy policy. We are wholly unsure whether this is really the actual wish and intent of the majority of Danish citizens.

We urge you to reconsider any funding of woody biomass energy. Estonia is a small country which is still suffering from its difficult political past. The political support for sustainable forestry [is weak](#) due to large influence of the forest sector. The forest industry has subjected the Ministry to regulatory capture.

Estonia would get on the path of sustainability and good public governance faster with help from the older members of the democratic family, like Denmark. It would benefit us all. According to the UN's Aichi Biodiversity Target 3, also a part of the European Forest Strategy, all incentives harmful to biodiversity should be eliminated, phased out or reformed in order to minimize or avoid negative impacts by 2020.