

## Forest management pre-assessment / certification/ surveillance /re-certification audit report

<b>Title of the forest management organization:</b>	MTÜ Eesti Erametsaliit
<b>Address of company</b>	Toompuiestee 24, Tallinn,10149
<b>Location of certified territory:</b>	Estonia
<b>Contact person:</b>	Mari Tuvikene
<b>Audit report date:</b>	03.03.2023
<b>Report approval date:</b>	13.03.2023
<b>Certificate issue date:</b>	17.02.2020
<b>Certificate expiry date:</b>	18.02.2025
<b>Certificate number:</b>	TT-PEFC-FM006
<b>Audit type:</b>	Surveillance No. 3
<b>Used standards:</b>	PEFC Eesti Rahvuslik Metsamajandamise Standard Version 10.08.15;  PEFC Checklist - Group Forest Management Certification PEFC ST 1002:2018

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## 1. Audit team description

<b>Lead auditor (Name, Surname):</b>	Ülo Roop
Brief description of experience, compliance with the status	FSC and PEFC CoC an FM Lead Auditor for three years. MSc diploma on Forest Ecology from SLU Sweden.

## 2. Description of the certification candidate's activity

<b>Title of the forest management organization, legal status, contact person information</b>
Eesti Erametsaliit MTÜ Toompuiestee 24, Tallinn, 10149
<b>Number of employees and contractors</b>
4 staff employees working at the FME responsible for group certificate, 118 group members (private persons and companies, exact number of employees unknown). Approximately 230 subcontractors registered which make different works for group members.
<b>Management objectives defined in Forest managements plan</b>
The Eesti Erametsaliit MTÜ (EEML or FME from now on) has group certificate under PEFC Forest management Group standard requirements. The management objectives are defined by the group members individually. The group members aim to have sustainable yield and income from their properties as a long-term objective. The forest management is planned and implemented considering the PEFC Estonian National Standard and National Forest Act. Each property has 10-year compulsory management plan based on the forest inventory which includes recommendations for forest management. FME as group certificate holder has defined its own objectives which are available on the web page.
<b>Description of the organisational structure of forest management implementation</b>
Group certificate, with certificate holder MTÜ Eesti Erametsaliit (EEML). EEML performs the accepting of the members, management of the membership and related information, annual reporting, assessment of the members and suspension of the membership. Inspection and monitoring of the following of certificate scope and requirements are managed according to the established procedures: <ul style="list-style-type: none"> <li>- agreement between the members of the group and EEML</li> <li>- instructions for completing the checklist.</li> <li>- work arrangements of the EEML`s PEFC group-certificate control group and control unit</li> <li>- internal control and work arrangements of EEML`s PEFC group-certificate members</li> <li>- evaluation of non-compliances and weaknesses of EEML`s PEFC group-certificate members</li> <li>- corrective actions for the non-conformities and weaknesses found at internal audit.</li> <li>- internal audit plan</li> <li>- conduction of first internal control of EEML`s PEFC group-certificate members</li> <li>- relevant documentation list for internal control of EEML`s PEFC group-certificate members</li> </ul> <p>EEML group-certificate members at January 2023 – 118 members (259251 ha at the 31.12.2022).</p>

The forest area covered with the scope of the certificate is located across Estonia (distributed according to the areas managed by the members). EEML has an overview of the managed forest lands, member-based register (property, county, municipality, number of the cadastral, ha). Minimum once a year each member must update the information. Last update made in the end of the January 2023.

### Managed area distribution by species and age groups

In relation to the group-certificate the distribution of managed land by the group members might vary of species and age groups for every group member. Exact information of the group member is gathered and recorded into tables of which summarized tables are created and hold up to date.

Group members forest land proportion by tree species is following:

Forest land by main tree species							
Pine	Spruce	Birch	Aspen	Grey Alder	Alder	Others	Total (ha)
45742	40833	101255	20790	35610	9119	5903	259251

### Final felling performance

The main felling type is clearcutting or so-called regeneration cutting. It forms 42 % of the total cutting types. The rest of the cutting types are improvement cuttings. The harvesters are mainly used for regeneration cuttings and also for some thinnings. In case of large diameters and dense undergrowth chainsaw operators are used prior to harvester activities.

Regeneration cuttings				Maintenance cutting						Other cuttings			
Clearcut		Selective cutting		PCT		Thinning		Sanitary cutting		Corrective cutting		Other	
ha	m3	ha	m3	ha	m3	ha	m3	ha	m3	ha	m3	ha	m3
6923	1309902	387	34550	4476	25254	3782	182946	964	27658			77	3940

### Forest non-timber products and services

Typically, non-timber products are not harvested for commercial purposes. Mushrooms, berries, lichen etc. could be obtained from forest and access for local communities is not restricted by the regulations. The property owners have cooperation with local hunting clubs for game management. Recreation is mainly organized by the State Forest Management Centre, usually not organized by private forest owners such as the members of EEML.

### General description of the forest management system

The system and control of the forest management according to PEFC Estonia National Forest Standard is performed through EEML (procedures - see above the description of organizational structure for execution of forest management).

For each group-certificate member the access is given to the relevant documents (PEFC Estonia National Forest Standard, the Forest Act, Nature Conservation Act etc.), which is the basis for performing forest management and related operations (forest regeneration, cutting, maintenance and protection etc).

EEML collects and maintains summary information on executed cuttings, re-forestation, forest area, protected species etc. by each member. Every year the internal control (internal audits) of the randomly selected members is conducted by EEML, it includes the evaluation of the management system, documentation and field audits. The purpose of the internal audits is to evaluate member`s compliance to the currently valid legislation and documents (including subcontractors` control by the members). EEML has developed and documented

relevant procedures for execution of the internal audit, recording the results and further improvements. All members are checked at least once within the 5-year validity period of the certificate.

EEML informs, trains (if necessary & possible) and provides additional information (seminars, brochures) regarding the various aspects of forest management in general. Environmental and cultural protection is organized by Environmental Board (EB) via legislation and protection acts submitted for protection areas. WKH protection by private forest owners is voluntary, in case it is preferred, special compensation agreement for each WKH is signed with State and forest owners. Special restrictions on the cutting sites are noted where relevant in the cutting permit. When the site conditions prohibit cutting activities, the cutting permit is not issued.

In case forest owner discovers environmental or culturally important area, EB conducts inventory on this area and determines the presence of the protection value. In case it is needed, protection measures are implemented by EB. In case stakeholders discover such values, notification is sent to EB for further investigation, in case of identified protection value, forest owner is notified via forestry registry.

Usually, neighbours are communicated about upcoming forestry works, especially in cases, where land or road usage agreement has to be signed. EB notifies the neighbours on cutting permit issuance and expects any feedback in case there are any by SH within 30 days after submission of the permit.

#### **Total forest area (ha)**

259251

#### **Area and description of forests with restricted forest use**

<b>Restriction zone</b>	<b>ha</b>
Landscape protection area	576
Environmental protection area	1679
Species protection area	2202
Watercourse protection area	1216
Buffer zones	194
WKH	108
Other restrictions	194
Cultural heritage area	386
Naturepark	1422
Nationalpark	422
Restriction not specified in database	14868

Abovementioned restriction zones have different restriction measures which are stated in the protection act of this specific area or in state legislation. The application and control over such restrictive measures lies mostly on EB, which controls also the follow up of such restrictions. Each forest owner has direct obligation to follow any restrictions set by such documents. In case of any violations, it will be registered in the EB and appropriate measures implemented.

#### **Annual allowable cutting rate.**

1117958 m<sup>3</sup> (2020)

1558590 m<sup>3</sup> (2021) (deforestation – 3882 m<sup>3</sup>)

1584250 (2022) (deforestation – 3940 m<sup>3</sup>)

Is there any significant changes since last audit (changes in company, certification requirements; legal requirements, accreditation requirements)?

- Yes  
 No

Description of changes:

Area has changed approximately 6700 ha. This increase occurred because larger forestry companies have acquired more forestland into their portfolio.

### 3. Management structure description and audit program

- Single Certificate  
 Multiple FMU Certificate  
 Group Certificate

Size class	Time needed per sample in working days (surveillance audit)	Count of forest management units / group members
>100 000 ha	5 (4.5)	0
10 000 – 100 000 ha	2.5 (2.0)	2
1.000 – 10.000 ha	1.5 (1.0)	3
101 – 1.000 ha	1 (0.7)	4
<100 ha	0.5 (0.5)	2

#### Audit program

Parameter	St1 / pre assesment	St2 / Initial audit	S1	S2	S3	S4
FM Standard	x	x	x	x	x	X
Group standard	x	x	x	x	x	x
Number of Group members / FMUs planned to audit per size class: (Group / multiple FMUs certificate only)						
Size class	St1 / pre assesment	St2 / Initial audit	S1	S2	S3	S4
>100 000 ha						
10 000 – 100 000 ha			1	3	2	
1.000 – 10.000 ha			6	5	3	
101 – 1.000 ha			6	3	4	
<100 ha			6	0	2	

GROUP member / FMU sampling is carried out according to LFM\_03B PEFC Forest Management Group and Multiple FMU Certification procedure.

Applied methodology and sample rate is described below

Sufficient sample rate from 118 group members taken according to the previous audit trail, occurred SH consultation and based on the size of the group member. Sample taken from previous audit practice considering that within 5-year cycle each group member shall be audited for compliance (as there over 20 group members, then within 5-year cycle, at least 20 different group members shall be included). Each group member has various number of managed properties all over the Estonia. Prior to audit, the list of activities of each group member on each property during last 2 years is collected and preliminary random selection is made of such members and their properties (considering the type of activity, scale of the activities by the company, cutting scale etc). From this selection, each member's sites are visited and verified via databases/interviews the compliance of their activities according to the applicable standard requirements. During current assessment, total of 11 group members activities were evaluated. Onsite visits carried out for 10 group members, rest of the group member's activities evaluated on the documentation basis (considering cutting activities during recent 2 years).

Note: When calculating the number of days to audit group members / FMUs who need to be visited (X) table below is used:

Size class	Time needed per sample in working days	Count of sample who need to be visited	Time needed in working days
>100 000 ha	5 (4.5)	X	5*0
10 000 – 100 000 ha	2.5 (2.0)	2	2.5*1
1.000 - 10.000 ha	1.5 (1.0)	3	1.5*1
101 - 1.000 ha	1 (0.7)	4	1*1
<100 ha	0.5 (0.5)	2	0.5*1

#### 4. Annual audit route and events

<b>Date: 28.02.2023</b>		
<b>Forest management unit / Location / objects</b>	<b>Activities / comments</b>	<b>Participants</b>
<b>EEML office in Tallinn (Toompuiestee 24) 09.00-12.30</b>	Opening meeting with responsible person, document review, sample verification, documentation review of forest management activities.	Ü. Roop M. Tuvikene
<b>66901:004:0641 and 66901:004:0642</b>	Visited Kassaka property of one of the group certificate member. Recent regeneration felling carried out in sub compartment 5, 1,99 ha, main species Birch and Aspen, regeneration works conducted appropriately, sufficient amount of retention trees left. Interview with forest manager. Sub-compartments 3 and 4 (0,26 ha and 0,33 ha respectively) (66901:004:0641) clearcut 5 years ago. Sufficiently renewed with Spruce, maintenance cut conducted.	Ü. Roop M. Tuvikene Forest Manager K.-H. L.

<b>Date: 01.03.2023</b>		
<b>Forest management unit / Location / objects</b>	<b>Activities / comments</b>	<b>Participants</b>
	Document review, documentation review of forest management activities. FMP review, members review, procedures, documents storage, data management, internal audits etc.	Ü. Roop M. Tuvikene
<b>71001:001:0121</b>	Lüllemetsa property. Visited regeneration fellings conducted two years ago (Sub-compartments 26-31 and 34), sufficient amount of retention trees, borders respected. No violations detected, no environmental protection significance. Cutting permits checked (50000497128-50000467138), no limitations detected.	Ü. Roop M. Tuvikene
<b>71201:001:0489</b>	Jānesemetsa property. Visited two sites, Clearcut in sub-compartment nr 2 and thinning in sub-compartment nr 4. Thinning in beautiful birch stand, conducted with sufficient density, no obvious damage to soil or trees retained, 2,94 ha. Sub-compartment nr 2, 0,8 ha, cutting permit nr 50000736518 checked, note about cutting limitations within the bird nesting season. Cuttings performed outside the season (0,75 ha). Checked compliance of sub-compartments 5 and 6 (cutting permits nr 50000738944 and 50000736516) no specific restrictions noted.	Ü. Roop M. Tuvikene
<b>71201:001:0155</b>	Longimetsa property. Large thinning area. Sub-compartments nr 1, 3, 4, 5, 6, 9, 1, 11, 14, 15, 18, 21, 23. Majority of the area regenerated with birch ca 20 years ago. Pine in second layer. Thinnings conducted in first layer birch stands to increase the light conditions and enhance the growth of fast-growing birch. Within the property cultural heritage site (old foresters' settlement, not significantly preserved but no violations regarding the management observed.	Ü. Roop M. Tuvikene
<b>80801:002:0084; 80803:001:0297</b>	Not accessible during the audit field visits. Checked Ostaru property, sub-compartment nr 3, 0,65 ha, cutting permit nr 50000521068, no specific restrictions. No nature values or cultural values detected on maps.	Ü. Roop M. Tuvikene
<b>56801:005:0291</b>	Visited Kuke property, sub-compartment 1 and 2. Interviewed forest manager about the management principles in the company. Two sub-compartments regeneration cutting conducted. Next steps discussed (mineralisation and most likely planting spruce). Left buffer zone between the stand	Ü. Roop M. Tuvikene Forest manager M. T.



	and adjacent agriculture area. Sufficient retention trees counted. Cutting permits nr 50000646256 and 50000646254 no specific restrictions, no cultural or natural significance in the area. Borders well marked and respected. Discussed requirements of the monitoring and applications in the field (organisation is using specific apps available to outsourcers and forest managers to conduct monitoring prior and after to the management activities).	
<b>8083:001:0582</b>	Rautsika property. Visited sub-compartment nr 11, conducted thinning in 5,6 ha. Cutting permit nr 50000653342, specific restrictions on the cutting permit regarding the Tetrao Urogallus living habitat (KLO3100804). Cutting permit issued in 06.04.2022, restrictions on cuttings between 15. April until 30 <sup>th</sup> of June, respected (cuttings conducted recently (in January/February). Specific acceptance from Environmental Board should have been asked when cuttings done without the frozen ground. Visited additionally sub-compartment 8, small regeneration area, 0,2 ha. Same restrictions apply as for sub-compartment nr 11.	Ü. Roop M. Tuvikene Forest manager M. T.
<b>80803:001:0542</b>	Pärna Property. Visited sub-compartment 9, regeneration felling conducted recently. Sufficient amount of retention trees left. Planted birch. Potential wind power plant area. Discussed such projects and related aspects within the forest management context.	Ü. Roop M. Tuvikene Forest manager M. T.
<b>80801:001:0392</b>	Kiviaru property, visited sub-compartment 21 and 22. Previous agriculture land, regeneration cutting conducted recently. Cutting permits nr 50000622044 and 50000622042. No specific restrictions except respecting the birds nesting season. Relatively small soil damage on the extraction roads, according to the Forest Manager, it will be handled when dryer conditions arrive during following season. Old farm place still evident.	Ü. Roop M. Tuvikene Forest manager M. T.
<b>80801:001:0080</b>	Purchased and sold cutting rights in Arumetsa property. Various silviculture works carried out by outsourcing company (visited sub-compartment 10, where guillotine machine conducted thinning in alder stand).	Ü. Roop M. Tuvikene Forest manager A.A.
<b>80801:001:0513</b>	Kivastu property, visited sub-compartment 2, ongoing regeneration cutting, stopped due to the mild weather, waiting for colder time to soil freeze. Interview with forest manager, discussed principles of forest	Ü. Roop M. Tuvikene Forest manager A.A.

	management. Large quantity of deadwood left as well as sufficient amount of retention trees. Cutting permit nr 50000798550, no specific restrictions. Checked maps for overlap of cultural or natural heritage sites, none. Well done management activities.	
<b>Date: 02.03.2023</b>		
<b>Forest management unit / Location / objects</b>	<b>Activities / comments</b>	<b>Participants</b>
<b>28203:005:0461</b>	Tiksi Property, visited sub-compartment nr 4 nice PCT. Interview with Forest manager about the principles of such management. Density sufficient. Additionally discussed further actions in sub-compartment nr 8, where next thinning is planned with Malwa small harvester in order to be more flexible in the stand and reduce the soil damage risk.	Ü. Roop M. Tuvikene Forest manager R.P.
<b>69403:001:0075</b>	Visited Indo-Metsa property, nice thinning in alder stand. Ongoing chipping nearby of the material extracted from the stand.	Ü. Roop M. Tuvikene
<b>63601:003:0691</b>	Visited several sub-compartments in this Viksi property with the owner and forest manager. One of the best managed areas visited during this audit. All sub-compartments are hand-cut. No harvesters used. Thorough management plan worked out for the whole area, different stages of developments of various main species. Additionally, good road network. Owner is really enthusiast to manage the area with best intentions and silvicultural knowledge and experience. All various activities observed (clearcut, thinning, PCT, planting, pruning etc).	Ü. Roop M. Tuvikene Forest Owner and manager M.K.
<b>82001:001:1630</b>	Visited small property Kuslapuu, sub-compartment nr 1, nearby the main road. Spruce grown on agriculture land, uneven density. Guillotine has removed bushes, according to forest manager, the plan is to regenerate empty areas with spruce to raise the density.	Ü. Roop M. Tuvikene Forest Manager A.J.
<b>85501:001:0065</b>	Vistied sub-compartment nr 21 in property Singa Ann. Recent clearcut adjacent to river, bank protection zone, respected the provisions. Available forestry expertise (nr 1000008928 from 03.06.2022 by Environmental Board) about the strong Spruce bark beetle damage. Respected provision to retain standing trees at least 5 m <sup>3</sup> /ha.	Ü. Roop M. Tuvikene Forest Manager A.J.
<b>Date: 03.03.2023</b>		
<b>Forest management</b>	<b>Activities / comments</b>	<b>Participants</b>

unit / Location / objects		
<b>71301:001:0135</b>	Visited property Ain-Kaarli, sub-compartment 15 and 16, both clearcuts. Cutting permit nr 50000483064, no restrictions set. Borders verified; old farm place preserved.	Ü. Roop M. Tuvikene
12.30-15.30	Documentation review of forest management activities and group management handling system, monitoring documentation, stakeholder communication.	Ü. Roop M. Tuvikene
15.30-17.00	Final review of the documentation, gathering additional evidence from the forest managers	Ü. Roop M. Tuvikene
17.00-17.30	Preparation for the closing meeting and closing meeting.	Ü. Roop M. Tuvikene

## 5. Summary of public consultation.

*Is there any complaints received by the CB about the client?*

- Yes (see table below)
- No

Stakeholders view, objections raised	Audit team response, audit findings
<b>Economic issues</b>	
Interviewed several forest owners and forest managers during the audit course field visits	Positive response for overall communication of the group certificate management system.
<b>Social issues</b>	
Interviewed several forest owners and managers regarding the social aspects of the forest management activities.	In overall, the SH considered the social cooperation positive regarding the relations with neighbours. Agreements are usually set for land use.

<b>Environmental issues</b>	
Interviewed several forest owners and managers regarding the environmental aspects of the forest management activities.	Environmental issues are mostly respected, whenever there are environmental values discovered, evidence suggest that there is notification system in place to protect the environmental values.

## 6. Certification applicant eligibility of certification requirements description

*This chapter shows all inconsistencies and observations made during the audit of this year and time frame for the implementation of corrective actions*

### 6.1 Existing requests for corrective actions and observations

*This chapter shows all inconsistencies and observations made during the audit of this year and time frame for the implementation of corrective actions*

NA – No Open CARs.

New requests for corrective actions and observations

NA – No CARs issued during the audit.

<b>Lead auditor</b>	<b>Ülo Roop</b>	<b>Date</b>	<b>03.03.2023</b>	<b>Finding No.</b>	<b>1</b>
<b>Process / Location</b>	<b>CO documentation management</b>	<b>Standard / Clause</b>	<b>3.1</b>		
<b>AUDIT TEAM LEADER TO INDICATE CATEGORY OF FINDING AND ACTION</b>					
<b>Major</b>	<input type="checkbox"/>				<b>Mark if requires repetitive</b>
<b>Minor</b>	<input type="checkbox"/>				<input type="checkbox"/>
<b>Comments (OFI)</b>	<input checked="" type="checkbox"/>				
<b>AUDIT FINDING DETAIL (Evidence + Requirement + Finding)</b>					
<b>OBS: As currently the information about the conversions occurred in the group members areas is not systematically collected, there is suggestion to collect such information annually from the group members in order to have overview of the scale of the conversion operations and thus control the evidence.</b>					
<b>Agreed response date:</b>	<b>02.03.2024</b>				

<b>2. Action to be completed by client to address the audit finding above – To be completed by the client</b>	
<b>CORRECTION (Remedial Action &amp; timescale)</b>	
Click or tap here to enter text.	
<b>ROOT CAUSE ANALYSIS (How / why did this happen)</b>	
Click or tap here to enter text.	
<b>CORRECTIVE ACTION (To prevent recurrence)</b>	
Click or tap here to enter text.	
<b>Date of response:</b>	Click or tap to enter a date.
<b>3. Acceptance and Verification of (planned) Correction and Corrective Action – To be completed by the BM Certification Auditor</b>	
Description of evidence accepted and if applicable verified:	
Click or tap here to enter text.	
Date of Acceptance of (planned) correction and corrective action stated above:	
Click or tap to enter a date.	
<b>Accepted</b> <input type="checkbox"/>	<b>Further Submission Required</b> <input type="checkbox"/>
<b>Verify Next Audit</b> <input type="checkbox"/>	<b>Verified and closed</b> <input type="checkbox"/>

## 6.2 Summary table of audit results

Indicator	Observations, stated violations, inconsistencies
1-19	No violations observed
3	Observation raised due to the possibility of improvement in the data collection from the group members.

## 6.3 Compliance with the certification requirements

Recommendation	
To recognize that the forest management company carries out forest management operations according to the PEFC Forest management certification standard	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
The conclusion is based upon information acquired during the certification process, certifying that:	
The forest management organisation has ensured the correction of all the significant inconsistencies established above	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

The forest management organization has demonstrated that the forest management system and normative basis ensures compliance with the requirements of the certification standard within certified forest areas	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
The forest management organization has demonstrated that the forest management system and normative basis is applied in practice in the forest management process of certified forest areas	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Commentary	
-	

**LEAD AUDITOR'S CONCLUSIONS:**

Clear recommendation on whether the organization complies with the standard requirements:

<b>During the audit course and visited and reviewed sample, it is evident that the PEFC FM group certificate management system is properly implemented suggesting that the EEML activities comply with applicable PEFC FM standard requirements.</b>	
<b>Lead auditor:</b>	<b>Ūlo Roop</b>
<b>Audit pack reviewer:</b>	<b>Jānis Švirksts</b>
<b>Date</b>	<b>13.03.2023</b>