

To: Margus Kohava and Aadu Polli
Est-For Invest OÜ
Lõõtsa 6, Tallinn11415, Estonia

Subject: Est-For biorefinery development poses risks to environment

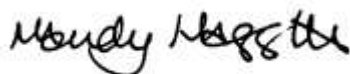
Dear Mr Kohava and Mr Polli,

The Est-For biorefinery, planned next to the river Emajõgi, in Estonia, poses serious risks to water quality and forest ecosystems in the region. In June 2017 the Estonian Council of Environmental NGOs warned the developers and the Estonian Government about several of the project's risks, but so far the response has been unsatisfactory. The project will produce an annual output of 700,000 tonnes of pulp, and consume 2.5 to 4 million cubic metres of wood. The environmental, social and political risks of this huge project, which will have a lifespan of many decades, include the following.

- Due to increased pollution from the refinery, the water quality of River Emajõgi and Lake Peipus may worsen.
- Estonian forests may degrade further. Estonia is committed to sustainable forestry, but has failed to create a sufficient legal framework to effectively protect its biodiversity and carbon stock. Therefore the additional timber demand for the refinery is very likely to harm biodiversity and lower the carbon stock.
- The procurement policy for the planned refinery is inadequate. The developers have not made a commitment to source only FSC certified timber and are therefore willing to use timber from sources that cannot guarantee sustainability of their operation. This would create an unwanted market for non-certified timber.
- The environmental impact assessment (EIA) may not give satisfactory results as it is being given to the lowest public tender, with insufficient attention to quality. The legal requirements for the EIA are not appropriate for the scale of this project.
- Estonia has a history of weakening environmental regulations in favour of large operations once they face difficulties. A refinery of this size would give undue importance in political processes to access to raw materials.

We acknowledge that the ongoing EIA and licensing process may safeguard against some of these risks, but substantial voluntary measures from both the company and state are needed to ensure full sustainability of the plan. Until this happens we are warning against investment in the Est-For refinery development. We look forward to hearing from you about how you will address these issues.

Yours faithfully



Dr Mandy Haggith, co-ordinator, [Environmental Paper Network](http://environmentalpaper.eu), in support of the following organisations:

Estonian Fund for Nature

Estonian Ornithological Society

Estonian Green Movement- FoE

Estonian Seminatural Community Conservation Association

Baltic Environmental Forum

Tartu Students' Nature Conservation Circle

Student's Society for Environmental Protection NGO

West Coastland NGO

Nõmme Tee Selts