

Comments:

1. The certified forest managers/owners are regularly checked by independent certification bodies, therefore indicators 2.1.1, 2.1.2, 2.1.3, 3.2.3, 3.3.1, 4.1.8 and 4.2.5 should be assigned with low risk.

The forest management standards that are applicable in Latvia fully covers SBP requirements.

2. We suggest to assign with low-risk threshold all indicators pertaining HCV identification/protection (2.1.1, 2.1.2, 2.1.3, 3.2.3). In Latvia key species, habitats, ecosystems and areas of HCV are identified and protected. Latest National level Nature Census was carried from 2017 until 2020 by Nature Conservation Agency.

3. Regarding indicator 2.2.3, the data provided by the State Forest Service does not reflect unsustainable exploitation. An average of approximately 12 million m³ of round wood harvested each year in Latvia's forests, which is less than the annual increment, therefore forestry in Latvia can be considered as sustainable. Also, there are no evidences provided that the harvesting volumes has led to "the loss of WKH and habitats of EU importance - mostly due to clearcutting, removal of dead wood, drainage and modifications in hydrological functioning, soil damage, the spread of invasive species, habitat fragmentation and isolation as well as disturbance in relation to bird species." The statement shall be deleted.

4. In Latvia there are no customary rights (statement included in the indicator 4.2.4). In Latvia free access to recreation, berry and mushroom collection granted in the forest law.

5. Roma people, Russians, Jews, Belarusians, and other nationalities cannot be considered as traditional communities (indicator 4.2.4).