Stakeholder consultation report

Consultation period: 30 June – 30 August 2017

Prepared by: Ilia Osepashvili, Coordinator of Working Group of Georgia on FSC Standards (WGFS)

Date: 26 October 2017

Background

The WGFS was established in October 2013 and endorsed by FSC in July 2014. The process of development of the current draft of Controlled Wood National Risk Assessment (CW NRA) for Georgia started in 2015, and the initial draft was developed and sent to FSC (PSU) in the spring of 2016.

The first comments from PSU were received in June 2016. Since then, two further updated versions of CW NRA were produced by the WGFS, taking into consideration those as well as the further comments of the PSU. Eventually, the no objection to conduct public consultation was received by WGFS from FSC in June 2017. The consultation period started on 30 June and ended on 30 August 2017. During this period, a one-day stakeholder meeting was held (on 9 August 2017). Several important comments were received by the WGFS from the stakeholders in this period. Some comments were received just after the expiration of the consultation deadline. Due to the importance of these comments, and considering the fact that they were basically a follow up of the meeting held on 9 August, they were incorporated in the analysis and will be considered in the further version(s) of the CW NRA.

Summary of the issues raised by the stakeholders and responses from the WGFS

Most of the comments of the stakeholders were related to the issue of **illegal and uncontrolled logging**. Namely, the key message was that the problem still remains to be quite serious (as forests, including those with HCVs, are threatened by this) and thus specific risk should be assigned to the respective indicators (e.g. 1.4, 1.8). As specified risk had already been assigned to these indicators by the WGFS before the public consultation, this risk category remained unchanged.

Concerns were also raised with respect to the **traditional forestry-related practices** of the high-mountain communities in Georgia. Although no information on concrete practices could be provided by the stakeholders, they mentioned that some people might still conduct (or are willing to do so) traditional, ecologically sound low-scale forest use practices near their homes (e.g. cutting small branches without significant damages to the forest trees). Georgian legislation does not recognize such traditional (or customary) forest use practices. Nevertheless, the stakeholders who had commented on this issue suggested to assign specified risk category to Indicator 2.3, because the respective traditional forest use practices might become forgotten in the current circumstances (when there is no legislative or other type of support to these practices). The WGFS members who were present on the meeting on 9 August 2017 (Ilia Osepashvili, Irakli Macharashvili and Mamuka Khoshtaria) agreed that specified risk could be assigned to this indicator. The final decision will be made by the WGFS. If specified risk is assigned to Indicator 2.3, the respective control measure will also be elaborated.

It was also mentioned by one stakeholder that in the past, there were some problems in issuing long-term **logging licenses** (i.e. state forest authorities granting these licenses to the private companies based on auctions). Specifically, there was limited competition among the applicant companies and, as a result, the state budget received less revenue than it would have received if competition had been wider. Nevertheless, since 2013, no logging licenses have been issued to the private companies. Furthermore, according to the current forest policy in Georgia, the priority is given to the strengthening of the state forestry sector, rather than

delegating forest management rights to the private sector. In these circumstances, the WGFS deems that the risk category of the respective indicator (1.2) could remain low.

Other comments were related for **forest inventory and management planning**. Namely, some of the stakeholders argued that since there is no up-to-date (i.e. less than 10 years old) inventory data for most of the forest area in Georgia and, respectively, no forest management plans exist for these areas, specified risk should be assigned to Indicator 1.3 (contrary to the initially assigned low risk category). This viewpoint was accepted by consensus among the participants of the meeting on 9 August 2017. As a control measure, these participants suggested that up-to-date forest management plan shall exist (based on proper forest inventory) in the forest management unit (FMU) claiming to supply CW. The final decision will be made by the WGFS on the risk status of this indicator. The respective stakeholder comments/suggestions will be taken into account to the maximum possible extent.

Important comments were provided with respect to the **safety at work** (Indicator 1.11) and **legal employment** (Indicator 1.2). Specified risk had been assigned to both of these indicators prior to the public consultations. Regarding Indicator 1.11, one stakeholder suggested to provide an additional control measure, such as the employment of a labor safety inspector (accredited by the state forestry body) at the forest management unit, which would claim to supply CW. With respect to 1.12, it was also suggested that all forestry workers shall have contracts, while their salaries shall be increased to the decent levels. Most of the participants of the meeting (9 August 2017) agreed to these suggestions. The WGFS will consider these suggestions during the preparation of the final draft of the NRA (before submitting it to the PSU).

Very interesting comment was received with respect to the **free, prior and informed consent** (Indicator 1.14; low risk had been assigned prior to the public consultation). One of the stakeholders argued that the application of Environmental Impact Assessment (EIA) procedures (which would involve proper public consultations) before the commencement of forestry operations would safeguard low risk category to this indicator. Nevertheless, the current Georgian legislation does not have the requirements for conducting EIA before forestry operations. In addition, public participation in discussions of forest management plans, forestry legislation, policies and other related documents has significantly improved recently. Consequently, risk category for this indicator could remain low.

One comment was received on the issue of **customs regulations** (Indicator 1.19; low risk assigned initially). The respective stakeholder argued that customs authorities measure wood in weighting units, while respective wood origin documents indicate wood volumes. This might create some inconsistencies. However, the present Georgian legislation does not require measuring wood in volumes at the customs. Furthermore, there are no significant numbers of cases of violations of customs regulations with respect to export/import of wood. Consequently, risk category remains low for this indicator.

Finally, important comment was received with regard to **forest conversion**, Indicator 4.1 (low risk initially). Namely, one of the stakeholders maintained that forest clearance rates exceed the limits of low risk, because in recent years, infrastructure development activities such as mining and building power lines cause forest loss in the magnitude of hundreds of hectares per year. Although no precise numbers are available, the current information about infrastructure projects suggests that most probably, the average annual forest clearance rate exceeds 550 ha (the low risk limit for Georgia). Consequently, most of the participants of the meeting on 9 August 2017 agreed with this argument. The WGFS will take this into consideration during the development of the final draft of the NRA.

Analysis of the stakeholder groups who submitted the comments

The stakeholders who submitted their comments could be divided into the following major categories:

- *State forestry sector (Biodiversity Protection and Forest Policy Department and National Forestry Agency)*
- *Environmental NGOs*
- *Representatives of labor unions (forestry sector)*
- *Scientific sector*
- *Individual experts*

The detailed information on the specific comments made by each of the stakeholder representative is provided in ANNEX 1. But in general, NGOs and individual experts were mainly concerned about illegal logging, problems in protection of traditional forestry practices and issuing forest use licenses, and insufficient public participation levels. Public servants and specialists from scientific community mentioned the problems of illegal logging and poor forest management planning. Labor union representatives, as it had been expected, mainly spoke about problems in safety at forestry work and social insecurity of the workers.

Nevertheless, it was observed during the common stakeholder meeting that there were no major disagreements among the participating stakeholders. In other words, no major interest groups were revealed with respect to CW NRA process (at least during the public consultation period). This could be explained by the fact that key forestry problems and their causes are well known in Georgia and there is a broad public consensus on this. In contrast, there are significant differences in the opinions on the possible solutions of these problems (for instance, potential directions of forestry reforms). But these are outside of the scope of CW NRA.

ANNEX 1

Copies of the comments provided in a written form

Only one written comment was received in English. The remaining comments (both written and verbal) were all in Georgian. Consequently, the translated versions are provided. The original (Georgian) versions are available upon request. The written comments are provided here in their original form (however, the statements mentioning particular persons were removed for the sake of confidentiality). During the translation, maximum effort was made to reflect the meaning of the original statements as accurately as possible. The comments provided in verbal form during the meeting on 9 August 2017 are given in the meeting notes below.

The written comments

<<< Dear WWF Controlled Wood Assessment Committee,

I would like to comment briefly as a local Georgian citizen (US and Swiss origins too) who owns a home near an important ecosystem in the region of Dusheti, the village of Choporti near Bulachauri. The riverine system in this area is of great importance for biodiversity and ecosystem management. I am concerned by several issues in your evaluation. At a personal level, since I heat my village house partly with a woodstove (Czech made, efficient burning) I must buy wood each year when I have not cut a tree in my garden, for example a mulberry tree damaged by lightening, etc. I worry each year that most people do not ask about fuelwood origin. I realize we should not encourage the unlicensed trade in wood, however I don't know of any guidelines.

Therefore I highly welcome this initiative to put a legal system in place.

At another level, less personal perhaps, as I have lived in Georgia 25 years and formerly worked for the creation of the first National Biodiversity Country Study in the 90s, I have of course followed the development of forest protection, which was totally lacking in earlier years after Perestroika.

FIRSTLY: As an anthropologist I am aware of the importance of forests and products for local people. Indeed, one section in this study might not correspond to reality:

2.3. The rights of Indigenous and Traditional Peoples are upheld.
Context: Are there indigenous peoples, and/or traditional peoples present in the area under assessment?
Are the provisions of ILO Convention 169 and United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) enforced in the area concerned? Is there evidence of violations of legal and customary rights of indigenous or traditional peoples? Etc.
Conclusion: low risk (There are no indigenous peoples and no traditional peoples in Georgia).

I did not read the additional information or categorizations of what 'traditional peoples' means in this context, however, if this applies to high-mountain grasslands (am not sure about forests?) I would take issue with the assertion that there are "no traditional peoples in Georgia". I refer notably to the Khevsur populations (and probably Tushetian and Svanetian) who presently engage in traditional management of their ecosystems that are intertwined with their own customs and social systems. These populations have been the object of study by ethnologists working on traditional economic systems, including transhumance and inter-village management of natural resources.

I am not an expert, but hope that 'traditional management' and the rights of high-mountain villages will get particular attention by those drawing up any resource management policy.

This issue is related to the following section also:

3.6 HCV6: Forest stands which are essential for cultural identity of local population and that have significant religious, cultural, ecological or economic importance

Context: Does the area under assessment contain HCV 6? Is HCV 6 threatened by management activities?
Conclusion: low risk for forests within Protected Areas and forests managed by Georgian Orthodox Church and specified risk for other forests (illegal logging, poaching, unregulated grazing and unsustainable forest management)

There is no reason to single out only the official Georgian Church, as the traditions of high-mountain populations still include elements of Zoroastrian religious heritage that are not recognized by the church such as "kist" worship sites in forests and other natural sites of cultural and traditional importance. These should be taken into just as much consideration as the economic considerations of 'official' religions of the country.

SECONDLY
In the particular case of the Choporti/Aragvi River plain, the wetlands are essential, with wildlife that includes frogs, turtles, bats and other endangered species (for example these are important for regulating mosquitoes and other insects) and are now under threat from unorganized development. Referring to the following sections, indeed all of Section 3:

3.3HCV3: Forests containing rare or endangered ecosystems

Context: Does the area under assessment contain HCV 3? Is HCV 3 threatened by management activities?
Conclusion: low risk for forests within Protected Areas and specified risk for other forests (illegal logging, poaching, unregulated grazing and unsustainable forest management)

3.4HCV4: Protective forests (watersheds, soil protection, water regulation, etc.)

Context: Does the area under assessment contain HCV 4? Is HCV 4 threatened by management activities?
Conclusion: low risk for forests within Protected Areas and specified risk for other forests (illegal logging, unregulated grazing and unsustainable forest management)

My comments here include the risk of destroying the delicate ecosystem of the Aragvi riverine forests and wetlands, especially considering that they are near important water reservoirs for human consumption. The 'lakes' created in Soviet times should be preserved, with the surrounding woods and vegetation. The lakes are important 'flyover' zones for migrating birds, such as white cranes from Iran, on their way from the south (Iran, Africa) to Europe. I have witnessed illegal hunting of these rare birds.

Today we see more and more 'small businesses' clearing away vegetation near the river banks, for example restaurants, and in the last years even a 'river mining' operation re-started on the bank of the Aragvi near the village of Choporti bridge, excavating stones from the river bed and grinding them to gravel. This of course is not sustainable, and could change the river's course or watershed protection properties. Additionally the noise pollution is important for what was formerly a undisturbed natural area. I assume this is licensed activity but do not think it is carefully monitored. On a positive note, there have been recent initiatives by the local authorities to limit cars into the forests near Choporti, but wood-gathering, hunting and other activities continue.

The unfettered development of the nearby town of Natachtari (Mtskheta Region), especially restaurants along the main highway, is gradually moving northward, and now building and construction supply businesses line the road as far as Choporti. This implies that human populations will increase along this axe, parallel to the riverine system. <u>It points to a strong need for local regional authorities to work together against special interests.</u>

Thank you for your work and especially for making this study available to the public for comment. Hopefully the establishment of clear guidelines and a <u>reinforced Environmental Ministry</u> responsible for Georgia's national resource systems will follow.

Sincerely yours,

Mary Ellen Chatwin Hofmann, PhD

15 July 2017, Tbilisi >>>

<<< Indicator 1.2: In order to make the argumentation [for low risk[1]] more clear, I think the respective sentence should have the following formulation: "according to amendment of the "Forest Use Rules" (approved by Governmental Decree # 242 on 20 August 2010) made in 2013, it was prohibited to issue logging licenses before forest inventory is conducted in the respective territory". Furthermore, the issuing of licenses of this type is not foreseen national forest concept document and forest management policy currently existing in the country. According to the forestry policy, priority is given to strengthening the capacities of the state forestry bodies.

Indicator 1.3: Long-term license holders have conducted forest inventory and prepared 10-year forest management plan. In addition, they submit annual forest use plans. Those who possess 20-year logging licenses, are obliged to conduct forest inventory and prepare a 10-year forest management plan after the expiration of this original 10-year management plan. At present [by August 2017[2]], forest inventory has been conducted on 284,594 ha of the territory of state forest fund managed by National Forestry Agency (including logging license areas) and on 150,000 ha of the state forest fund managed by the Forestry Agency of Ajara Autonomous Republic. By 2020, the inventory will have been completed on 740,623 ha managed by the National Forestry Agency (including issued logging licenses). In cases, when the controlled wood is supplied from areas where there is approved forest management plan based on forest inventory, the risk for this indicator could be low.

Indicator 1.4: An interested person, after purchasing the permission at the bank, goes to the allocated area together with the forest ranger, where he/she conducts the logging. Before the transportation of the logged wood, the ranger, together with this person, fills in the wood origin document, where the following is indicated: location, number of wood cutting area, species, volumes, place of loading and wood transportation starting time. This means that wood origin document is also used as transportation clearance, which has the validity of 12 hours from the beginning of transportation till the end. I have just focused my attention to this procedure. I agree with the specified risk category.

Indicator 1.8: Taking into consideration the fact that logging is conducted by non-professionals (often by the local population), of course, it is specified risk. In case if the new forest code is approved and wood is produced by the forestry agency only, I think we could then possibly assign low risk category. However, based on the current situation, I totally agree with the assigning of specified risk.

Indicator 1.19: In case of primary processing of round wood (logs), the special template document is filled, where the following attributes are included on the product: origin, name of the document proving the purchase or import (and the date and number). The measuring unit and quantity/volume is also indicated for that product, as well as the special tag number which was attached to the log (of which the sawn-wood was produced). This procedure is based on the Order N996 of the Minister of Finances. In earlier times, all cargo and respective documents were checked. However, the customs officials had problems in terms of determining wood species and volumes. It was quite a laborious task, there was no sufficient knowledge and the relevant procedures were too lengthy. At present, only the documents attached to the cargo are checked. However, the customs officials have the so-called special risks program which reveals persons fined in the past; if such a person is revealed, his/her cargo is checked. Regarding the estimation of amounts of wood by weight, there is a special conversion table to cross check the volumes and weight for dry and moist wood. I deem that the risk is low, following from the fact that often the Environmental Supervision Department conducts checks of the transported wood and so does Financial Police. There are huge penalties for violators. Consequently, the risk of fraud is low.

Indicator 2.3: Over the last century, only foresters have conducted silvicultural operations in Georgia. There was no traditional forest use. I would be very much interested to learn, what is meant by traditional forest use practice or what kind of practical experience exists (if any) in this regard among local communities residing in high-mountain regions.

Papuna Kapanadze, Representative of Forest Policy and Biodiversity Protection Department of the Ministry of Environment and Natural Resources Protection of Georgia)

1 September 2017; Tbilisi >>>

---

[1] Added by the Coordinator of the WGFS
[2] Added by the Coordinator of the WGFS

General comment on the title of CW NRA Category 5 -

<<< Contextually, fast growing plantations are meant here, which is correct with respect to controlled wood; however, I think it is necessary to change the wording, because [in Georgia[3]] such plantations will not be established within the forest (according to the provisions of the new forest code) [the new code is still under preparation[4]]; in other words, it will not be possible to produce genetically modified tree species in the forest. For such plantations there is the following formulation in the draft version of the new forest code: Territories, which are not located in the forest and are used for short rotation plantations of forest-related woody species for up to 30 years from the establishment of such plantations; these territories are parts of the forest land categories [but not of the forests themselves[5]]

Natia Iordanishvili, Deputy Chairman of the National Forestry Agency of Georgia

30 August 2017, Tbilisi >>>

<<< Category 1.4: During the meeting [on 9 August[6]], me in person and other participants mentioned the already established but artificially invented "social cuts[7]", which has become the perfect system for uncontrolled use of wood resources as well as cover for the total destruction of the country's forests. Specifically: using these cuts as a cover, it is possible to cut as much wood as possible and of any type, including within unique floodplain forests; the latter need special measures of recovery, due to their condition caused by unpermitted and illegal logging.

Teimuraz Kandelaki, Professor, Georgian Agrarian University

28 August 2017, Tbilisi >>>

Meeting notes and photo

Stakeholder meeting to discuss the first draft of CW NRA for Georgia

Date: 9 August 2017

Venue: WWF-Caucasus Programme Office (11 Aleksidze Street, Tbilisi, Georgia)

Participants (see also Annex A):

Ilia Osepashvili, National WG Coordinator; Senior Forest Officer, WWF-Caucasus

Irakli Macharashvili, National WG member, ecological chamber

Mamuka Khoshtaria, National WG member, economic chamber

Papuna Kapanadze, Representative of Forest Policy and Biodiversity Protection Department of the Ministry of Environment and Natural Resources Protection of Georgia

Teimuraz Kandelaki, Professor, Georgian Agrarian University

Giorgi Kavtaradze, PhD, Acting Director, V. Gulisashvili Forestry Institute, Georgia

Paata Torchinava, Representative of Ministry of Environment and Natural Resources Protection of Georgia

Rezo Getiashvili, Representative of Caucasus Environmental NGO Network (CENN)

Anzor Gogotidze, Representative of Tusheti Protected Areas Friends Association

Marina Kurtanidze, Chairman of Georgia's Independent Professional Union of Builders and Foresters

---

[3] Added by the Coordinator of the WGFS
[4] Added by the Coordinator of the WGFS
[5] Added by the Coordinator of the WGFS
[6] Added by the Coordinator of the WGFS
[7] This is the category of wood cutting which is aimed at satisfying the social needs of the local population in terms of fuelwood and small-sized timber; wood produced under the umbrella of social cuts by a local villager shall only be consumed by this villager. He/she is not allowed to sell this wood, neither give it free of charge to other parties.

Guram Khurtsidze, Representative of Georgia's Independent Professional Union of Builders and Foresters

Debates

In total, 11 people participated in the meeting. At the beginning, Ilia Osepashvili presented to the participants basic information about FSC system of voluntary forest certification as well as Controlled Wood National Risk Assessment (CW NRA). The importance of elaboration of NRA standard for Georgia and associated benefits were explained. This was followed by the discussion of the NRA document summary by the categories, indicators and respective risks assigned. The objective was to identify, to which risk conclusions the participants agreed and to which – disagreed. In the latter case, the disagreeing participants were asked to provide respective evidence. The final objective was to achieve overall consensus among the meeting participants on the updated risk designations and follow-up steps. The indicators whose status was debated by the participants as well as the associated argumentations are described below. Those indicators for which the designated risk status was not challenged, are not mentioned in this document.

Indicator 1.2 (low risk initially). Irakli Macharashvili argued that in the past (specifically, before 2012) there were problems in the process of issuing wood harvesting licenses. For instance, based on the investigation of the State Audit Office of Georgia[8] (2016), the long-term logging licenses (for 20 years) had been issued on the basis of auctions, involving limited competition (e.g. of 60 logging license auctions conducted from 2007 to 2012, 48 involved only one candidate). Main reason for this limited competition was the fact, that the potential logging license areas had been proposed by the candidates, not by the state. As a result, the revenues of the state from selling the logging rights were also limited. According to the same investigation, the logging licenses had been issued without prior detailed inventory of forests, which resulted in imprecise calculations of the available wood resources (in fact, the volumes of wood available "on the ground" were lower than those originally defined in the auctions). Furthermore, license conditions (respective rights and obligations of the license holders) were only defined in a general way, without sufficient detail. The latter factor made subsequent evaluations of the fulfilment of license conditions problematic. Most of the meeting participants agreed to this argument. Nevertheless, based on the consensus among the participants, it was decided to leave the designation of low risk, because since 2012, no such violations have taken place. Furthermore, from as early as 2012, the policy priority of the state forestry authorities (National Forestry Agency (NFA) and Forest Policy and Biodiversity Protection Department) has been not to assign forests for logging licenses. Instead, it is planned to strengthen the capacities of NFA to implement wood harvesting operations themselves.

Indicator 1.3 (low risk initially). Giorgi Kavtaradze and Papuna Kapanadze maintained that specified risk should be assigned to this indicator, because in most locations of the state forest land, forest harvesting took place without proper forest inventory data (i.e. no detailed inventory had been carried out prior to the initiation of logging). This viewpoint was accepted by consensus among the participants. As a control measure (CM), it was suggested that detailed forest inventory should have been carried out within the forest management unit (FMU) (in accordance with the Rules for Forest Inventory, Planning and Monitoring (2013), claiming the right to assign CW status to the wood produced within its boundaries.

Indicator 1.11 (specified risk initially). Marina Kurtanidze argued that for this indicator, CMs should include the availability of labor inspector at the FMUs, claiming to supply CW. This labor inspector should be accredited by respective state authorities. This argument was supported by all of the participants.

Indicator 1.12 (specified risk initially). Marina Kurtanidze maintained that risk should be specific for this indicator, because there are cases when forestry work (including logging) is being performed without any contract agreement (neither written, nor verbal one). In addition, as she continued, the monthly salaries paid to forestry workers (including rangers from the state sector and private loggers) are very low - 480 Georgian Lari (about 200 US$) or often much less. Consequently, based on the consensus among the participants, the category of specified risk should be left for Indicator 1.12. The respective CM should include existence of contract agreements with forestry workers (preferably written ones), in accordance with Georgian legislation. Salaries of forestry workers should also be increased significantly.

Indicator 1.14 (low risk initially). Rezo Getiashvili argued that Environmental Impact Assessment (EIA) is the best mechanism for safeguarding proper public participation (e.g. in line with the requirements of Aarhus Convention) in

---

[8] *The management of commercial wood resources: report on the effectiveness audit.* State Audit Office of Georgia, 2016. Current number: 6/36.

forestry-related decision-making. Unfortunately, Georgian Law on Licenses and Permissions (2005)[9] does not require EIA or equivalent for forestry operations by logging license holders. As a result, the participation of public during the planning of forestry operations by logging license holders is not sufficient, as it does not meet the requirements of Aarhus Convention (due to absence of EIAs). Nevertheless, according to the NRA guidelines (e.g. National Risk Assessment Framework - FSC-PRO-60-002a), the risk assessment takes into consideration the fulfilment of existing legislation (whether sufficiently good or not), rather than the quality of this legislation. From the point of view of the levels of fulfilment of existing legislation, the risk level should remain low (further details are provided in the assessment of this indicator in the NRA document itself).

Indicator 1.19 (low risk initially). Irakli Macharashvili mentioned that timber is measured in volumes (m3) in wood origin documents, while at the customs, the same wood is measured in tons. This creates serious discrepancies and prevents from proper tracking of wood. In addition, as a rule, the customs officials do not possess sufficient knowledge to distinguish among wood species. In fact, they are not obliged to measure timber in cubic meters, according to existing customs regulation (Instruction on Movement and Registration of Goods on the Customs Territory of Georgia, 2012). Nevertheless, there are no reports on significant number of cases of violations of the requirements of this customs regulation. Since the existing legal requirements are met (irrespective of the quality of this regulation), the low risk conclusion could remain unchanged for this indicator.

Indicator 2.3 (low risk initially). For this indicator, Anzor Gogotidze and other participants emphasized that although there are no indigenous or traditional peoples as such in Georgia, there are local communities living in high-mountains, who are willing to conduct certain traditional forest use practices. As a rule, these practices are ecologically friendly, not damaging forest stands (for instance, cutting certain branches, not the entire trees). As existing legislation does not recognize such practices and, consequently, they are legally not allowed, they could be forgotten over time. Consequently, based on the consensus among the participants, specified risk should be assigned to this indicator.

With respect to forests with **HCVs (Category 3 of the NRA)**, all of the assigned risk levels were accepted by the participants. In addition, Giorgi Kavtaradze mentioned that although HCV categories and sub-categories have been well specified at the national level, some HCVs have not been delineated on the ground. In response, Ilia Osepashvili mentioned that at present, WWF-Caucasus implements an activity quite successfully in Ajara Autonomous Republic (Georgia), aiming to identify and delineate the forests with HCVs on the ground. The outputs of this activity will be very useful for replication in other parts of Georgia. This will help the FMUs willing to supply CW, identify and delineate the areas of forests with HCVs within their boundaries. Irakli Macharashvili emphasized that pristine forests and Intact Forest Landscapes (IFLs) largely overlap. Consequently, care should be taken to avoid double calculation of respective forest areas.

Indicator 4.1 (low risk initially). Irakli Macharashvili argued that risk should be specific, because in recent years, significant forest area is cleared for mining, electric power lines and other infrastructure. Although precise figures are not known, the area of forests cleared for this purpose is in the order of hundreds of hectares per year[10][11][12], which might exceed the limit of 0.02% / 550 ha per year for Georgia. All participants agreed that the category of specified risk should be assigned to this indicator.

Indicator 5.1 (low risk initially). With respect to this indicator, Teimuraz Kandelaki (as well as all other participants) agreed that at present the risk is low. However, in the future, the risk might become significant, if GMO tree plantations are allowed for commercial-scale growth and utilization of wood produced from genetically modified trees (as these GMOs could penetrate the surrounding areas). At present, commercial use of GMO organisms (including trees) is prohibited by Law on Genetically Modified Living Organisms (2014) and this is unlikely to change in the observable future.

To summarize – the status of following indicators was suggested by the participants to be changed (from low to specified risk): **1.3, 1.12, 2.3, and 4.1**. These suggested changes were agreed among the participants on the basis of consensus.

---

[9] More detailed information and assessment of this as well as other laws and regulations mentioned in this report are provided in the detailed NRA document.

[10] *The management of forests and forest lands in Georgia. Assessment of legislation and implemented practices.* NGO "Green Alternative". Tbilisi, 2016. The publication was prepared with financial assistance from the EU, UNDP and GEF.

[11] Environmental and social issues linked with the building of electric power lines. MBA thesis prepared by Tinatin Arveladze. Ilia State University. Tbilisi, 2017.

[12] Legislation and practice related to economic projects implemented on the territory of state forest land. MBA thesis prepared by Tamuna Dzidzikashvili. Ilia State University. Tbilisi, 2016.

As a follow up step, it was agreed that Ilia Osepashvili would send to all of the meeting participants the updated summary of the NRA for Georgia (with stakeholder comments as well as suggested changes in the risk designations and CMs). The subsequent step is to discuss stakeholder comments and suggested changes of the risk designations at the National WG level and finally decide on these designations, before sending the updated NRA to FSC.

Annex A

Photo of the meeting and attendance list signed by the participants

დაინტერესებულ მხარეთა შეხვედრა კონტროლირებადი მერქნის რისკების ეროვნული შეფასების სტანდარტის განხილვის მიზნით (საქართველო)

2017 წლის 9 აგვისტო (WWF კავკასიის წარმომადგენლობა, ალექსიძის ქ. #11, თბილისი, საქართველო)

Stakeholder meeting to discuss Controlled Wood National Risk Assessment standard for Georgia

9 August, 2017 (Venue: WWF-Caucasus Programme Office, 11 Aleksidze Street, Tbilisi, Georgia)

სახელი, გვარი Name, family name	ორგანიზაცია Organization	კონტაქტი Contact details	ხელმოწერა Signature
ჰაკობ კაკნიაკ	გჰემს რჰკის სამსახ	577 270028	
		599 68 29 76	
		595 561533	
	"სნდმ"	593 20 12 52	
		599 451025	
	CENN	593 788 755	
	TPAFA	577921133	
		599 499 520	
		599 460449	
		551 50 92 98	
	WWF კავკ	555325292	

The complete list of stakeholders who participated in the public consultation

The announcement of public consultation was made on 19 June 2017. This announcement was made by means of Caucasus Environmental NGO Network (an email communication tool widely used not only in Georgia, but also in the entire Southern Caucasus). Consequently, most of the key forestry-related stakeholders received the respective information. In addition to that, the key stakeholders were invited directly to submit their comments (via email sent out by the Coordinator of the WGFS on 26 June 2017). Most of the latter have provided their comments (see the list below).

The list

Mary Ellen Chatwin Hofmann, Individual Expert

Natia Iordanishvili, Deputy Chairman of the National Forestry Agency of Georgia

Irakli Macharashvili, National WG member, ecological chamber

Mamuka Khoshtaria, National WG member, economic chamber

Papuna Kapanadze, Representative of Forest Policy and Biodiversity Protection Department of the Ministry of Environment and Natural Resources Protection of Georgia

Teimuraz Kandelaki, Professor, Georgian Agrarian University

Giorgi Kavtaradze, Acting Director, V. Gulisashvili Forestry Institute, Georgia

Paata Torchinava, Representative of Ministry of Environment and Natural Resources Protection of Georgia

Rezo Getiashvili, Representative of Caucasus Environmental NGO Network (CENN)

Anzor Gogotidze, Representative of Tusheti Protected Areas Friends Association

Marina Kurtanidze, Chairman of Georgia's Independent Professional Union of Builders and Foresters

Guram Khurtsidze, Representative of Georgia's Independent Professional Union of Builders and Foresters