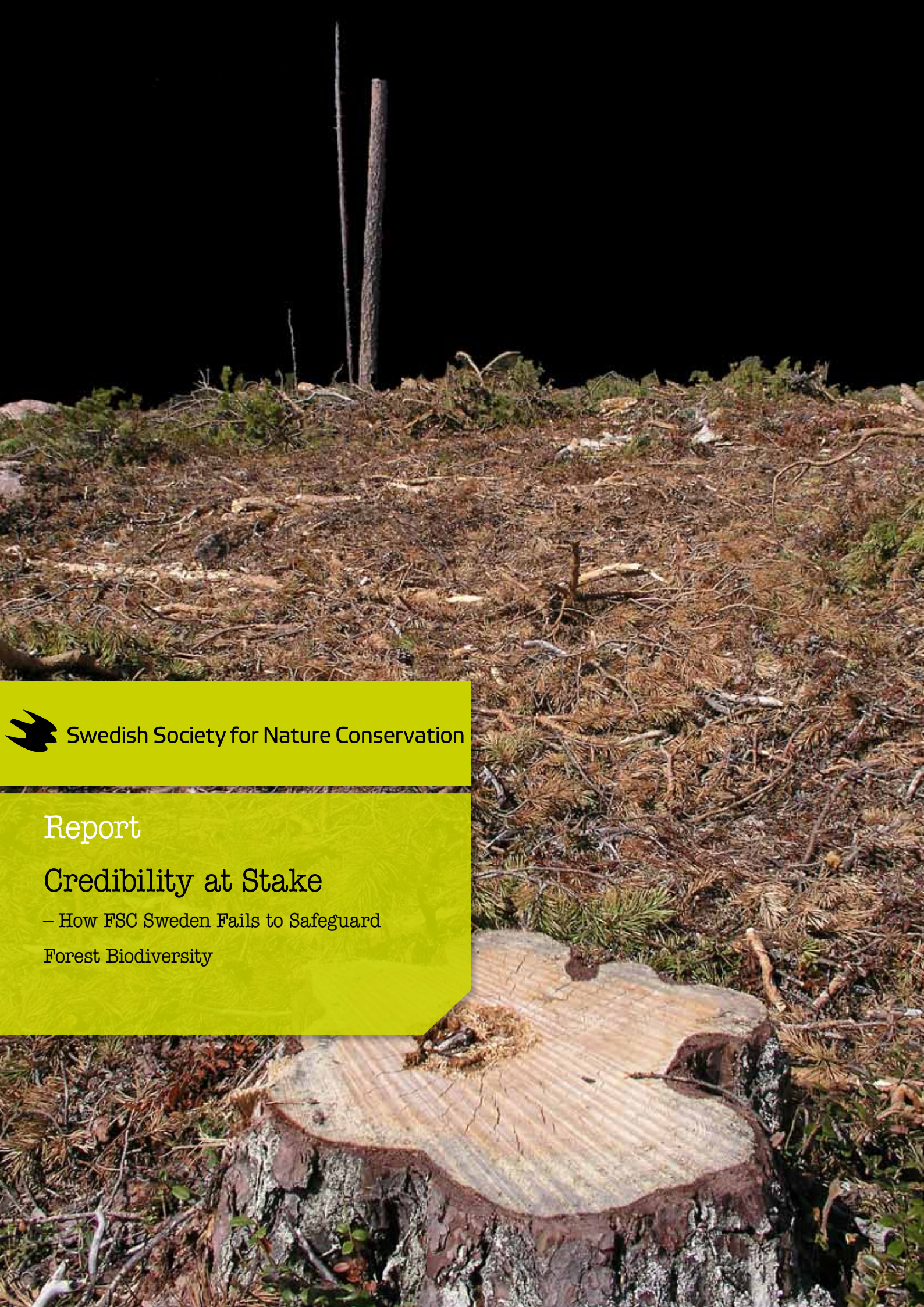

Swedish Society for Nature Conservation

Report

Credibility at Stake

– How FSC Sweden Fails to Safeguard Forest Biodiversity

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Sebastian Kirppu

Foreword

Sweden's environmental policy is based on sixteen environmental quality objectives adopted by the Swedish Parliament in 1999. The objectives and its precisions are very ambitious in regards to the conservation of biodiversity, not least in the forest. Despite these objectives, the Swedish forestland is in a final stage of a comprehensive and radical transformation from more or less intact or extensive cultivated forests with high biodiversity values to production forests with no, or very small, potential for biodiversity. Thousands of forest-living species are included in the national Red List of species. Also, 75 per cent of the populations of the red- listed forest-living species are decreasing, which is a consequence of the landscape transformation – from forests that have never been clear-felled to monocultures[1]. The transformation is ongoing, as clear-fellings of natural forests still take place on a large scale. This implies that the state of forest biodiversity will deteriorate[2] because the loss of habitat of species has not been halted.

The first standard for the FSC-certified forestry in Sweden was adopted in 1998. The Swedish Society for Nature Conservation (SSNC) had a positive attitude towards a forest certification in Sweden since the organization believes that positive incentives are an important part of a company´s environmental efforts. Therefore, the SSNC was very driven in the efforts to develop the standard. However, the SSNC has for many years, in field, documented deviations of the FSC-standard by the large forest companies in Sweden. Due to the poor compliances with the first FSC-standard the SSNC has, since 2009, been working systematically with formal complaints within the frame of FSC. During this work, several deficiencies regarding the complaint procedures have been observed, as well as shortcomings in the auditor's assessments of violations of the standard. The FSC is directed to guarantee that wood and paper products originate from a sustainable forestry, yet Swedish conservationists repeatedly document clear-fellings of natural forests, woodland key habitats (WKH) and habitats for threatened species - all under the flag of the FSC-standard. Deviations of the standard have been proven over time. Despite this, none of the reviewed forest owners´ certificates have been suspended.

The following report is delimited to the problems the SSNC has documented within the frame of the forestry conducted under FSC Sweden. Several of the processes described in the report are not yet closed due to the following:

i) Case has been submitted to the Accreditation Services International (ASI,) who reviews the work of the accredited certification bodies (CB).
ii) Case has not been processed by the CB, or the CB has not reported the outcome of the audit to the SSNC.

Certification of businesses is usually a step forward in regards to sustainability efforts. Unfortunately, in Sweden, we can only conclude that the forestry, despite the acute situation for the forest biodiversity, continues to clear-fell and fragment large, coherent, natural forest areas even if they are FSC-certified. The raw material from this forestry is then sold with the environmental seal "FSC-certified". It is primarily the certified land owner's responsibility to make sure to comply with the principles and criteria of FSC. When this is not done, the CB´s and the FSC should act. In Sweden, repeated and obvious deviations to the FSC-standard has been left without serious consequences, and certified companies have been able to continue violating the FSC-standard without suspension of the certification. If the FSC-certification is to make a real difference in the forest, it also has to be possible for an independent CB to suspend companies in practice, not just in theory.

Karin Åström
Vice President, Swedish Society for Nature Conservation

Introduction

In 1993, today's Swedish forest policy was adopted. An essential fundament of the policy is "freedom with responsibility". This implies that the forest sector has great freedom to decide how to manage the forests within the frame of existing forest and environmental acts. The forest policy also implies that forest owners, forestry and forest industry have a shared responsibility to preserve forest biodiversity through the so-called sector responsibility. The sector responsibility was formulated in 1998:

"Every sector of society has a responsibility to prevent further environmental damage and to solve the problems already existing. The cost of reducing environmental damage and to rectify already existing damage shall be borne by the one caused or causing the damage".[3]

In 1999 the Swedish parliament adopted 16 environmental quality objectives to be achieved. It is primarily the descriptive clarifications for the objectives "Sustainable Forests" and "A Rich Diversity of Plant and Animal Life" that are of particular relevance for the forest, even though several other of the objectives, in many ways, are linked to the forest. The forest sector responsibility is crucial in order to achieve "Sustainable Forests". This is stressed in the recent forest policy inquiry.[4]

Olli Manninen

Smekmyrtjärn, county of Dalarna. A high conservation value natural pine forest clear-felled by the FSC certified, state owned company Sveaskog. SSNC documented the forest in 2009, before it got felled. More than 230 findings of endangered, threatened and red-listed species were found. Sveaskog was notified about the documentation but did not consider the forest valuable enough to preserve

Hans Sundström

Smekmyrtjärn today.

The Swedish Forestry Act is based on two equal targets: environment and production. In reality, follow-ups carried out by the Swedish Forest Agency show that as much as 36 per cent of the logged areas do not fulfill the minimum requirements, of the Forestry Act[5], regarding environmental concern, creating significant difficulties to achieve the adopted environmental quality objectives. Furthermore, certified forest owners are expected to go beyond the legal requirements: "in addition, forest certification is seen as part of the sector responsibility".[6] This implies that forest certification, and the compliance of the certification, is important if the forest policy objectives are to be achieved.

The Swedish environmental movement, in general, is highly critical of how certification by the FSC operates in the Swedish forest landscape. The problems include violation of criteria, clear-felling of habitats for threatened and red-listed species, the functionality and transparency of the voluntary set-asides. Moreover, there are serious shortcomings in the system for external complaints.

Today, approximately 5 per cent of the Swedish forest is set aside on a voluntary basis.[7] The certification schemes FSC and PEFC require a minimum of 5 per cent voluntary set-asides of the certified forest. The area of a set-aside forest has to be at least 0,5 hectares. Smaller areas on clear-cuts are falling within the general nature consideration that is required by law.[8] The set-aside forest shall be preserved in its natural state, being marked on maps and consist of productive forest.[9] The set-asides are also important for the long-term achievement of the environmental quality objectives stating that biodiversity is preserved. Also, the set-asides serve as a complement to the formal protection. However, neither the parliament, government, authorities nor the general public have the knowledge of where a large portion of the set-asides are located geographically, their quality or how long the landowners intend to exclude the area of forestry.

Forest Stewardship Council (FSC)

The FSC is an international certification scheme for forests and forestry. It shall ensure that products come from well-managed forests that provide environmental, social and economic benefits. FSC-labeled merchandise shall not include wood from illegal loggings or logging performed without consideration to social and environmental aspects.[10] The FSC was founded in Canada 1993. Its purpose was to create a market-driven tool in order to achieve a responsible use of the world´s forests. In 1996 a working group was formed in Sweden in order to develop a national FSC standard. In 1998 the first FSC standard was adopted in Sweden; it was revised in 2010, after several years of delay. The FSC is based on three equal units: the economic, the social and the environmental chambers. Within FSC Sweden however, the number of members within each chamber is highly unevenly distributed with 35 members of the economic chamber, 4 members in the social chamber and 2 members in the environmental chamber. The distribution of members within the board of FSC Sweden is 6 members (6 organizations) within the economic chamber, 4 members (3 organizations) within the social chamber and 4 members (2 organizations) within the environmental chamber. The role of FSC Sweden is to disseminate knowledge about FSC in Sweden, to monitor the usage of the trademark FSC and to develop the Swedish FSC-standard[11]. The certification and the audit of forestry are done through independent CBs.

In 1995 the SSNC, together with WWF Sweden, took the initiative for the first FSC-standard and invested considerable resources in the work within the FSC. The SSNC considered the FSC to be a possible tool in order to, along with various partners, achieve a sustainable use of the Swedish forests. Despite the driven efforts of the SSNC to establish a good set of criteria as well as try to change the FSC in order to halt the depletion of forest biodiversity, the SSNC has, year after year, documented repetitive deviations of the environmental criteria committed by certified landowners. These documentations were the reason the SSNC defected from the board of FSC in 2008. After the defection the SSNC intensified its documentation of how FSC-certified forest companies complied with the standard. When no

***The FSC Principles**

Principle 1: Compliance with laws and FSC Principles
Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.

Principle 2: Compliance with laws and FSC Principles
Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.

Principle 3: Indigenous peoples' rights
The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.

Principle 4: Community relations and worker's rights
Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.

Principle 5: Benefits from the forest
Forest management operations shall encourage the efficient use of the forest's multiple products and services to ensure economic viability and a wide range of environmental and social benefits.

Principle 6: Environmental impact
Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.

Principle 7: Management plan
A management plan -- appropriate to the scale and intensity of the operations – shall be written, implemented, and kept up to date. The long term objectives of management, and the means of achieving them, shall be clearly stated.

Princip 8: Monitoring and assessment
Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts

Principle 9: Maintenance of high conservation value forests
Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.

significant improvement was noticed in the forest and large amounts of deviations were still documented, with practically no consequences for the certified landowners, the SSNC terminated its membership of FSC Sweden in 2010.

Except for the SSNC, other environmental NGO´s have left FSC Sweden. During the FSC annual meeting in 2007 the organization Nature and Youth left the FSC with immediate effect. The fundamental problem was, according to Nature and Youth, the regular clear-fellings of forests with high biodiversity value and that issued complaints did not result in any penalties or sanctions for the forest companies. Nature and Youth considered that "by staying within the FSC we legitimized and helped green-washing the unsustainable forestry of Sweden"[12]. The organization Friends of The Earth Sweden left FSC Sweden in 2012 stating that the "FSC-label for forestry and forest products does not represent the sustainable forestry it purports to do"[13] and that "FSC Sweden of today represents an eroded trademark … consumers are being deceived"[14]. The only Swedish NGO that works explicitly with forest issues, Protect the Forest, has chosen not to participate in the FSC at any level, considering, among other things, that "the FSC-label does not live up to its promises"[15] and that "after 14 years with a national FSC-standard we can only conclude that the possibility of, within the committee, influencing the standard for the better is very small. Very few improvements have been achieved over the many years that several of the major NGO´s of Sweden have been involved in the work"[16].

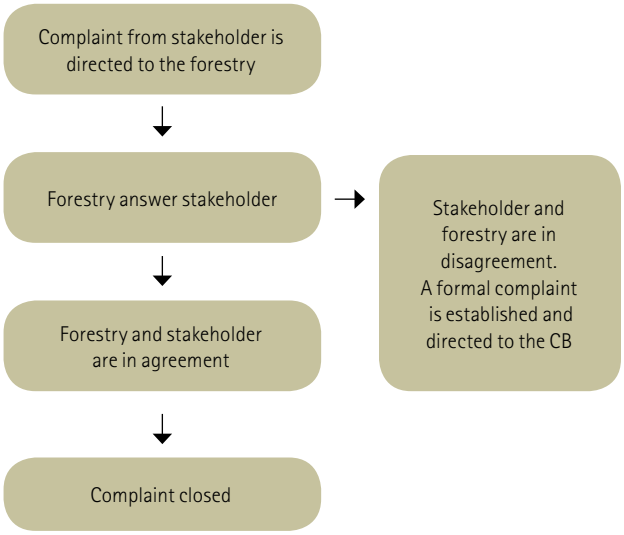
Mikael Gudrunsson

A FSC-certified clear-cut in Härjedalen, county of Jämtland. Landowner is Bergvik Skog.

Complaint Procedures within the FSC

In addition to the formal work of the three chambers within the FSC, FSC has developed a dispute resolution system to support external stakeholders wanting to assure that forestry is carried out in accordance with the FSC-principles and criteria. All comments on FSC-certified forestry received by a CB shall be addressed and answered by the CB.[17] In Sweden there are seven certification companies approved by the FSC.[18] The SSNC reviews in this report cover three of the certification companies: DNV Certification AB (DNV), Bureau Veritas Certification Sweden (BV), and SGS Sweden AB (SGS). The possibilities for external stakeholders to review forestry according to the FSC-standard are supposed to be a way for stakeholders to influence forestry in certified forests.

If a stakeholder is dissatisfied with how forestry is conducted, a complaint can be established in accordance with the following procedure[19] (national level):



Graphics: Malin Sahlin

When a formal complaint has been filed to the CB it needs to be addressed, which, at a minimum, implies to answer the stakeholder. Each CB shall have internal procedures for handling complaints. The CB has preferential right of interpretation and therefore determines whether a deviation of the FSC-standard has been committed or not. If the stakeholder is not satisfied with the explanation and/or decision of the CB the case can be submitted to the ASI, which accredits the CB´s for FSC-certification. However, this report only covers the national process. In the case a CB agrees with the stakeholder on deviations of the standard; Corrective Action Request (CAR) is established. When receiving a CAR, the forestry must improve within the criteria where deviation has been documented. There are two different levels of CARs, minor and major:

	Minor CAR	Major CAR
Time horizon	Occasional / isolated incident	Permanent deviation, ongoing for a long time, or deviation that is repeated
Area	Non-systematic, small area	Systematic, large area
Impact	Restricted in time or place. Measures have been taken to ensure that the deviation will not occur again. The result of the deviation is not of such nature that it is in fundament conflict with the current criterion.	Results in deficiencies within the forestry unit which fundamentally differs from the current criterion. Although the deficiencies are pointed out in evaluations or audits, these are not rectified by the foresters.
Result	If a minor CAR is not corrected within the specified time, it automatically turns to a major CAR.	Does not allow issuance of a FSC certificate. In the case of the audit of a previously issued FSC certificate, such certificate shall be withdrawn.
Time period	Measures shall be taken within 12 months (in extraordinary circumstances, 2 years)	Measures shall be taken within 3 months (in extraordinary circumstances, 6 months. However, measures to prevent further deviations is always taken within 3 months)

Source: FSC – Guidance for stakeholder´s involvement in FSC-certification

How the processes work and what is expected of all parties, from stakeholder to international FSC, are simple and well described by the FSC.[20]

Olli Manninen

Jos-Olatjärn, Dalarna. In 2009, SSNC visited the threatened natural pine forest at Jos-Olatjärn and documented high biological values. Several findings of threatened species were documented. The land owner Bergvik Skog was notified on the occurrence of the species but did not consider the forests' nature values important enough to preserve and clear-felled the forest through their contractor Stora Enso.

Major shortcomings in CB's handling of formal complaints

Complaint procedures within the FSC system in Sweden have major flaws. The procedure is not complicated and each CB shall have clear routines for the handling of complaints. The formal complaints filed at the national level by the SSNC show deficiencies within the reviewed CBs. SGS and DNV have, despite repeated complaints regarding violations of the same criterion in the FSC-standard, not issued major CARs[21] or suspended the certification. DNV and BV have shown significant shortcomings regarding answering formal complaints filed by the SSNC. This has resulted in repeated reminders from SSNC for an answer or for just a confirmation that the case is received by the CB, which is a requirement within the FSC-regulations for complaint procedures. Repeated deficiencies in this fundamental obligation of the CB towards stakeholder are documented in 32 per cent of the formal complaints that have been filed by the SSNC during 2010-2012.

Hans Sundström

Despite the high conservation values and habitat for threatened species, this is what the natural pine forest of at Jos-Olatjärn looks like today. On a review of the clear cut several pine trees older than 250 years were documented logged. Furthermore, Bergvik Skog planted spruce on part of the clear cut, even though the area is dominated by pine.

Graphics: Malin Sahlin

The above illustrates three examples where CBs did not follow either the procedures that are described in the FSC or its own routines on how to handle formal complaints. Lack of communication from the CBs is recurrent in the handling of formal complaints from the SSNC. Other types of deficiencies in the handling of complaints are, for example:

i) Complaints are handled in various ways by the same CB,
ii) CBs provide stakeholders different instructions on how a complaint should be handled. These shortcomings can easily lead to confusion for the stakeholder, which tends to result in stakeholders choosing not to submit more than one complaint of violations of the FSC standard, even if such have been documented.

Olli Manninen

The natural pine forest at Ångermyran, county of Dalarna, consisted of the nationally underrepresented forest type, sandy pine forest. SSNC documented the threatened forest in 2008 and concluded that the forest had very high conservation values and held habitats for threatened and endangered species. The landowner, Sveaskog, was well aware of the high nature values of the forest and its content of endangered species. Still, the company chose to clear-fell a forest type that is prioritized within the national strategy for protection of forests.

Hans Sundström

SSNC Studies of the FSC-certified Forestry in Sweden

For a long time the SSNC has reviewed how the Swedish forestry lives up to its responsibilities in the forest. The organization has documented many hundreds of natural forests that—despite high conservation values, habitats for endangered species and often consisting of woodland key habitats (WHK)*—have been notified for clear-felling[22].

Already in 2002 members of the SSNC reviewed the compliances of the FSC-standard within the major forest companies and identified several deficiencies.[25] However, until 2007 the focus of the SSNC has primarily been to document forests with high conservation values in order to save them from clear-felling. During the inventories clear-fellings of natural forests were often noted and several of these clearings did, in all probability, not comply with the FSC-standard´s

*Woodland Key Habitats

WHK is a qualitative concept that is based on a combined assessment of the habitat structure, species composition, history and physical characteristics. WKHs have tremendous significance for the flora and fauna of the forests. They contain, and can be expected to contain, red-listed species. Species dependent on these habitats are disadvantaged by conventional forestry. [23]

The Forest Agency has surveyed WKHs since the 1990´s. A rough estimate is that approximately 30 per cent of the WKHs have been found and registered. The FSC-standard prohibits logging of WKHs[24] and requires that certified landowners have the skills to determine whether a forest is consisting of a WKH.

The parliament of Sweden has decided on two equal objectives within forestry: environment and production. The environmental objectives aim to conserve biodiversity; threatened species and habitats must be protected. The Forest Agency is the authority that decides on and registers WKHs.

Sebastian Kirppu

At Käringberget, county of Dalarna, Bergvik Skog and Stora Enso notified a WKH for clear-felling. The company Stora Enso had failed to identify the high conservation values of the forest. The area would most likely have been logged if the SSNC had not documented and pointed out the obvious WKH-qualities of the forest.

Olli Manninen

Lokstaflon, county of Jämtland. A forest with very high conservation values that SCA had failed to identify. The forest was planned to be clear-felled by SCA. SSNC visited the area and notified SCA on the high biodiversity values. The forest is now set-aside by SCA.

principles and criteria. This led to an intensified review of clear cuts followed up by complaints regarding deviations of the Swedish FSC-standard. Reviewed companies have primarily been SCA, Bergvik Skog, Stora Enso, Sveaskog and Holmen Skog. Clear-cuts have, since 2007, been assessed against the following criteria in the standard.[26]

The SSNC formal complaints have also included several other criteria; however, it is in the following criteria that repeated deviations have been documented for several years.

Number of formal complaints in 2009–2012 * divided per criteria/category	
6.1.7 and 6.2.1	21 (23**)
6.2.3 and 6.2.4	16 (17**)
6.3.18	17
6.5.3***	11

*Complaints include only, with two exceptions, the formal complaints filed by SSNC head office. Individual members 'complaints are not included.
**Including complaints that have included both criteria.
*** Including complaints involving soil damage within other criteria.

6.1.7	Managers shall assess environmental values at stand level prior to any major forest management activities, document the results, and plan and implement forest management so as to minimize adverse impacts
6.2.1	Managers shall exempt the following habitats from measures other than management required to maintain or promote natural biodiversity or biodiversity generated by traditional practices: a) Natural, conspicuously un-even-aged and stratified forests with an abundance of old/large trees and a high frequency of coarse dead woody debris in different stages of decomposition. b) Woodland key habitats according to the definitions and methodology of the Swedish Forest Agency, 1995. c) Low/non-productive forest land (land with a total annual volume increment less than 1 cubic meter per hectare).
6.2.3	Managers shall evaluate and document information about occurrences of red-listed species (Annex 5) outside delimited woodland key habitats, and about consideration measures to be taken as regards such occurrences.
6.2.4	Managers shall take demonstrable measures to protect occurrences of red-listed species (in accordance with 6.2.2) outside delimited woodland key habitats. These can be generic, including detailed consideration or care-demanding patches at felling, or specific such as small-scale measures or setting aside forest land for nature conservation purposes.
6.3.18	Managers shall retain and safeguard, as part of all forestry measures, all trees with high biodiversity values
6.5.3	Managers shall implement procedures for avoiding damage caused by heavy machinery, including appropriate methodology and technology for transports across watercourses

Case Studies

Criteria 6.1.7 and 6.2.1

SSNC has for several years documented hundreds of FSC-certified forests with high preservation values that have been notified for clear felling. Not infrequently, the Forest Agency has, after a notification from the SSNC, registered these as WKH or areas of conservation values and good potential to develop into WKHs. The FSC-certified landowners have therefore been forced to withdraw several of their logging notifications since logging of WKH is a violation of the standards´ criteria 6.2.1. The documentation of threatened WKH has only on a few occasions been subject of formal complaint. The large amount of logging plans within WKH that has been discovered by conservationists indicates that the certified companies consistently have deficiencies in assessments of biodiversity values (criteria 6.1.7). With hindsight, it is clear that many WKHs would have been logged in the hidden by FSC-certified companies unless the environmental organizations of Sweden would have discovered them.

In a number of cases where the SSNC has informed certified landowners about WKHs within their logging plans the landowner has not agreed with the organization and logged the forest without requesting clarification from the Forest Agency. Since in many cases it is very difficult to determine a WKH when the forest is felled, cases are sometimes left without measures from the CB.

Case Study of Bergvik Skog. Kolåsen, Åre Municipality, County of Jämtland.

The forest by the village Kolåsen was discovered by the SSNC when Bergvik Skog, by contractor Korsnäs, had felled trees for the purpose of constructing a forest service road and clear-fell the forest by Kolåsen. SSNC considered that the forest service road had been built through, and right into, a large WKH. The Forest Agency assessed the forest and came to the same conclusion as the SSNC. A large portion of the forest got registered as a WKH. A formal complaint was submitted to the CB (DNV) by the SSNC. Bergvik had violated criteria 6.2.1 and 6.1.7 in the context of logging activities within a WKH, and the contractor Korsnäs had not conducted an environmental assessment of the forest at stand level before a major forest management activity involving the logging of a forest service road right into a WKH.

Criteria 6.1.7 of the Swedish FSC-standard	SSNC´s formal complaint regarding deviation of criteria 6.1.7 in the case of Kolåsen	DNV´s assessment of the case
Managers shall assess environmental values at stand level prior to any major forest management activities, document the results, and plan and implement forest management so as to minimize adverse impacts	Environmental assessment of the forest at stand level had not been implemented before a major forest management activity involving the logging of a forest service road. The service road that was logged included a WKH and also led straight into a large WKH according to the assessment of the Swedish Forest Agency. The forest that was planned for logging is not hard to delimit to any sort of "stand level" since it is surrounded by old clear cuts and a small village.	Environmental assessment has been made for the part of the forest where the logging for a service road was conducted. Other environmental assessment for future logging would reportedly be made later. The FSC-standard does not specify that this way of subdividing environmental assessment is unacceptable. No deviation.

Formal complaint history for the case of Kolåsen.

DNV´s assessment has clearly not considered the fact that the environmental assessment conducted by the contractor had not identified the WKH, and that Bergvik Skog had not made an environmental assessment at stand level before forest management in accordance with criteria 6.1.7. DNV´s conclusion of the case shows that the CB is unwilling to hand out a CAR for the deviation of the criteria, which the SSNC has stated in its complaint. Instead, DNV has chosen to interpret the criteria in a way that does not at all follow the wording of the standard that states: "environmental assessment should be done at stand level before major forest operations." This wording does not describe, which DNV states in its reply, that the environmental assessment in one area may be divided with one assessment for the forest service road, and another one made before the felling of the forest that the service road had been built into. It rather clearly states that the assessment should be made at stand level. In the case of Kolåsen, stand level is not difficult to delimit since the forest planned for logging is completely surrounded by young forests, clear cuts and a village.

Furthermore, it should be noted that Bergvik Skog has a track record of poor performances regarding deficiencies in environmental assessments of non-registered WKHs. In 2008-2010, DNV has issued several CARs in regards to this:

Year	Deviation
2008	Minor CAR "Environmental assessments carried out by planners show deficiencies"[27]
2009	Minor CAR " Environmental assessment does not guarantee that WKH are identified in the planning"[28]
2010	Major CAR " Lack of methodology for environmental assessments"[29]

For three years Bergvik Skog has received CARs for deficiencies in environmental assessment. When the SSNC in 2011 filed a formal complaint, directly linked to the above deviations, for an additional violation of the standard the SSNC argues that this clearly indicates "permanent deviation, ongoing for a long time, or a deviation that is repeated" and that the deviation is "systematic". These indicators shall, in accordance with FSC, result in a major CAR[30]. For several years Bergvik Skog has repeatedly violated the FSC-standard in regards to environmental assessments. This indicates a fundamental problem within the company, which DNV in principle completely dismisses through an interpretation of the criteria 6.1.7 that does not properly address the problem.

The case of Kolåsen has been submitted to ASI.

The forest service road that was logged right through and straight into the heart of a large WKH that Bergvik Skog and the contractor Korsnäs failed to identify.

Daniel Rutschman

Olli Maninen

The critically endangered species *Antrodia crassa*, a species documented by the SSNC in forests that later were logged by Bergvik Skog, Sveaskog and SCA. This despite the companies' knowledge of the occurrences of the species.

Criteria 6.2.3 and 6.2.4

The forest land in Sweden is highly fragmented and only few areas are reminiscent of natural forest conditions[31]. Most of the forest landscape is no longer suitable as habitats for many of the forest living species. Clear-felling, soil scarification, densification, non-native tree species, etc. are continuing to decrease the habitats for forest species[32]. The area of natural forest and continuously wooded land is decreasing due to clear-fellings. These forests generally harbor high conservation values with special qualities and species that are dependent on old-growth forest and its structures. Although there will be new forests that meet the age criteria for "old forest", the continuous loss of the old and most valuable forests is resulting in a negative trend for old-growth dependent species.[33]

Based on data from the Swedish Species Information Center, the SSNC has made an analysis of the situation of the forest-living species in the highest threat categories—CR (critically endangered), EN (endangered) and VU (vulnerable)—and how the situation for these species has developed between 2005-2010[34]. Only species where forest is of "great importance" or "important" have been included. The analysis shows a negative trend for the situation for forest-living, threatened species.

The situation for CR, EN and VU forest species, comparison between 2005 and 2010

Category	Number of species	Unchanged	Improvement	Deterioration
CR	83	70 (ca 84 %)	2 (ca 2 %)	11 (ca 13 %)
EN	292	208 (ca 71 %)	24 (ca 8 %)	60 (ca 20.5 %)
VU	571	391 (ca 68 %)	53 (ca 9 %)	127 (ca 22 %)

During field surveys SSNC documents, among other things, threatened, endangered and red listed species. The landowner gets notified of the occurrences of red-listed species in their forest. Despite forest companies' knowledge of red-listed species, the SSNC has documented clear-fellings of several of these forests, even if the geographical locations of the species are not known to the landowner. The companies have simply not known where species have been documented – yet they clear-fell these forests. Following table show examples of harvested forests with documented occurrences of endangered and threatened species, where landowners had full knowledge of which, and how many, species had been documented by the SSNC. In all of the examples, with two exceptions, formal complaints have been filed.

Forest company	Forest area[35]	Amount of different red listed species	Amount of different threatened species
SCA	Långsjön, Norrbotten	8 (19 occurrences)	CR=1, VU=3
SCA	Lill-Gravberget, Västernorrland	27 (>500 occurrences)	EN=2, VU=6
Sveaskog	Abborrtjärnen, Dalarna	14 (> 60 occurrences)	CR=1, VU=4
Sveaskog	Ångermyran, Dalarna	10 (44 occurrences)	EN=3, VU=2
Bergvik/Stora Enso	Korskällåstjärnen, Jämtland	21 (> 210 occurrences)	EN=1, VU=4
Bergvik/Stora Enso	Ortkammen, Jämtland	14 (> 70 occurrences)	CR=1, EN=1, VU=3

Malin Sahlin

Hans Sundström

Korskällåstjärnen, county of Jämtland. SSNC documented the forest in 2010. The area held high biodiversity values and more than 210 findings of red-listed species were documented. Bergvik Skog and Stora Enso were notified. The companies did not regard the forest to have high enough nature values to be preserved.

Korskällåstjärnen today.

Criterion 6.3.18

The logging of trees with high biodiversity values is one of the most common violations of the FSC-standard documented by the SSNC. The forest company SCA has a long history of violating this criterion. Already in the 2002 audit, the CB (SGS) issued a minor CAR for the harvesting of trees with high biodiversity values after the SSNC in the county of Västerbotten had pointed this out to the CB[36]. In between 2002 – 2006, individual members of the SSNC documented logged trees with biodiversity values on several of clear-fellings conducted by SCA. However, no complaints for deviation of the criterion were filed until 2007[37].

Hans Sundström

In 2007, at Mellanbergsmyrorna, county of Västernorrland, SCA logged a natural coniferous forest with clear traces of a forest fire some 130 years ago. SSNC visited the clear cut and found that SCA had violated, or otherwise infringed on, no less than six criteria of the FSC-standard regarding environmental consideration.[38] At the site a large number of trees with biodiversity values were felled. The CB (SGS) issued four minor CARs and one major CAR for the deviations at the logging site. All CARs were closed in 2008, when SCA, according to SGS, had implemented corrective actions to ensure that the deviations would not be repeated. The deviations at Mellanbergsmyrorna most likely would not have been registered if the SSNC had not documented them.

Hans Sundström

In 2009, SSNC discovered Blåbärstjärn, 40 hectares of the remains of what had been practically pristine ancient pine forest. SCA had clear felled a forest that, prior to logging, was practically untouched by man[39]. The harvesting site was planned with no consideration of the area´s extremely high biodiversity values. On the harvested site hundreds of logged trees with biodiversity values were documented. Despite the fact that the previous year SGS had closed several CARs related to these deviations and despite clear evidence that the corrective actions implemented by SCA had not resulted in a change within the company, no CARs were issued by SGS in regards to the serious violations of the FSC-standard. The deviations at Blåbärstjärn would never have been registered if the SSNC had not documented them.

Hans Sundström

In 2010, at Andsjön, the SSNC discovered an ongoing logging where SCA was in the process of cutting down several trees with biodiversity values. Once again the SSNC documented how SCA violated the criterion 6.3.18. Also, parts of the felled trees were transported from the site for industrial purposes. A formal complaint was filed by the SSNC regarding the logging of trees with biodiversity values. However, SGS did not consider the deviation to be systematic and thus did not issue either minor or major CAR for the violation of the FSC-criterion. Instead SGS stated that "As perfection cannot be expected at any given time, repeated deviations will also to some extent have to be accepted"[40]. The SSNC consider that the deviations at Andsjön, together with previous violations of the same criterion, clearly show a "permanent deviation, ongoing for a long time, or deviation that is repeated" and that the deviation is "systematic". The deviations at Andsjön would probably never have been registered if the SSNC had not documented them. The felled trees, in direct violation of the FSC-standard, were loaded at the side of the forest service road on its way to the industry, labeled with the FSC-trademark.

Olli Manninen

Logged tree with biodiversity value at the site of Ratnivaara 2008.

Hans Sundström

Logged trees with biodiversity values at the site of Vattensjöberget 2009.

Malin Sahlin

Logged tree with biodiversity value at the site of Albloselberget 2011.

Above pictures show additional complaints, regarding criterion 6.3.18, filed by SSNC between 2008-2011 on logging sites of SCA.

Criterion 6.5.3

Damage to the ground during clear felling of forests is, and has long been, extensive in Sweden. There are several reasons for this: logging is conducted at the wrong time of the year when the ground is most sensitive, there are major shortcomings within the forest companies when planning forests for clear-felling, inadequate consideration is taken for sensitive habitats, etc. The soil damage and deep ruts may lead to a number of serious consequences, such as erosion and leakage of humus, nutrients and heavy metals, as well as trenching and compression of the soil pore system[41]. Repairing coarse ground damage is rather a cosmetic measure than a repair of the natural, ecological functions as the stability of the soil is in the roots. When damage occurs the natural bearing capacity is lost, and this is very difficult, if not impossible, to restore. In addition, repair carried out with an excavator means that the soil is dug all over again, increasing the risk of transportation of sludge, humus, nutrients and heavy metals to rivers and lakes[42].

The SSNC have documented and reported serious violations in regards to ground damage for several years. During 2011-2012 the SSNC particularly reviewed Holmen Skog and noted that the forest company had been causing serious ground and soil damage at several logging sites around the country. Formal complaints of the criterion 6.5.3 were issued for six of them.

Mikael Gudrunsson

Kråknäset, county of Östergötland. Coarse damage by reason of poor planning. The CB (DNV) issued a minor CAR for the deviation.

Naturskyddsföreningen

Ringsjöhöjden, county of Jämtland. Holmen Skog caused serious damage to the ground while harvesting. Several tons of sediment washed into an important stream for the trout. DNV issued a minor CAR for the deviation.

Hans Sundström

Narvaskaftströmmen, county of Jämtland. Coarse damage to the ground by the reason of soil scarification on sensitive ground. DNV issued a minor CAR for the deviation.

Hans Sundström

Klövberget, county of Gävleborg. Extremely deep wheel tracks created by reason of driving heavy machinery at the wrong time of the year. DNV issued a minor CAR for the deviation.

Malin Sahlin

Kyrkfallet, county of Östergötland. Damage to the soil by reason of poor planning. DNV chose not to handle the complaint of criterion 6.5.3 in its assessment despite the fact that SSNC addressed the matter in its complaint.[43]

Hans Sundström

Kvisselnvattnet, county of Jämtland. While constructing a forest service road, Holmen crossed a stream and a wet part of the forest without enough consideration, resulting in ground damage. No deviation was issued.[44]

Field surveys carried out by SSNC indicates that Holmen Skog´s routines appears to have large shortcomings concerning the planning of forests for clear-felling, not least in regards to consideration to soil and water that needs to be taken according to FSC and the Forestry Act. At the planning stage, risks of soil damage should be identified and consideration be taken accordingly. In 2011, Holmen Skog received four minor CARs related to soil damage.[45] Only two of the above examples were included in the 2011 audit[46]which means that additional CARs for soil damage can be added to the list. The majority of all Holmens minor CARs in 2011, for violation of the FSC-standard, are based on formal complaints of SSNC.[47] In addition to soil damage, forests with WKH-qualities has been planned for, or been clear-felled. Also, trees with high biodiversity values have been logged. Most likely, DNV would never have been notified of these deficiencies if SSNC had not filed formal complaints.

Voluntary Set Asides

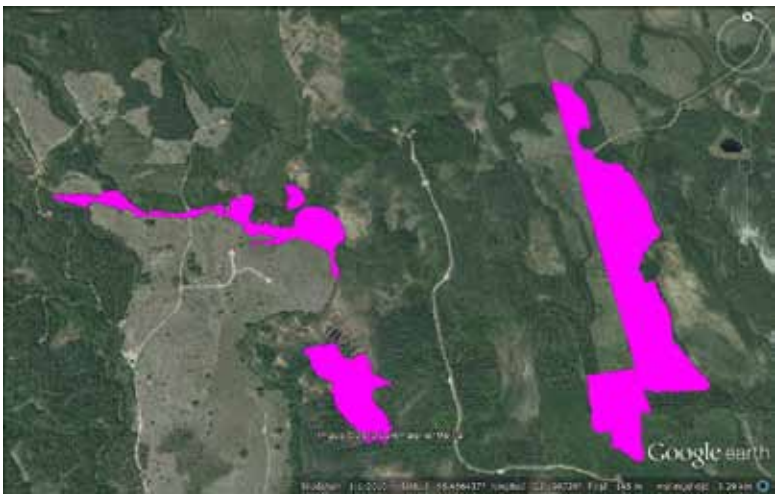
Within the framework of the two certification schemes, FSC and PEFC, certified landowners shall set aside at least five per cent of its productive forests for conservation purposes. The voluntary set-asides shall be marked on maps[48,49] and, according to the FSC-standard, be prioritized based on their significance for biodiversity and landscape representativeness.[50] Today, approximately five per cent of the Swedish forest is set aside on voluntary basis.[51] The set-asides are an important component for Sweden to achieve the environmental quality objective "Sustainable Forests". The set-asides are also regarded as a part of the sector responsibility.[52] The set-asides are therefore of great importance from a forest policy perspective as they are of great importance for the preservation of biodiversity. However, the quality of the set-asides is largely unknown and poorly documented, and the transparency is highly unsatisfactory since many of the set-asides are not marked on maps available to the public or the authorities. Also, a long-term protection of the set-asides is basically non-existent since the landowner can shift the set-asides geographically in the landscape at any given time and thus log a previous set-aside. Nor is there any guarantee that a voluntary set aside will be exempted from logging in the case of land sales[53]. In the light of the above, there is a great need for an increased transparency by clarifying the set-asides geographic locations, as well as the quality and long-term effectiveness of the set-asides.

Transparancy

If Sweden is to know how relevant the set-asides are for the preservation of forest biodiversity, and that the set-asides consists of productive forest, it is essential that they are clarified for the authorities and the general public. Today it is only the large forest companies, the state-owned forest and the forest owned by the church that have made their set-asides available on maps on the Internet for the general public to review. A very large part of the set-asides are completely unknown to politicians, authorities and the public.

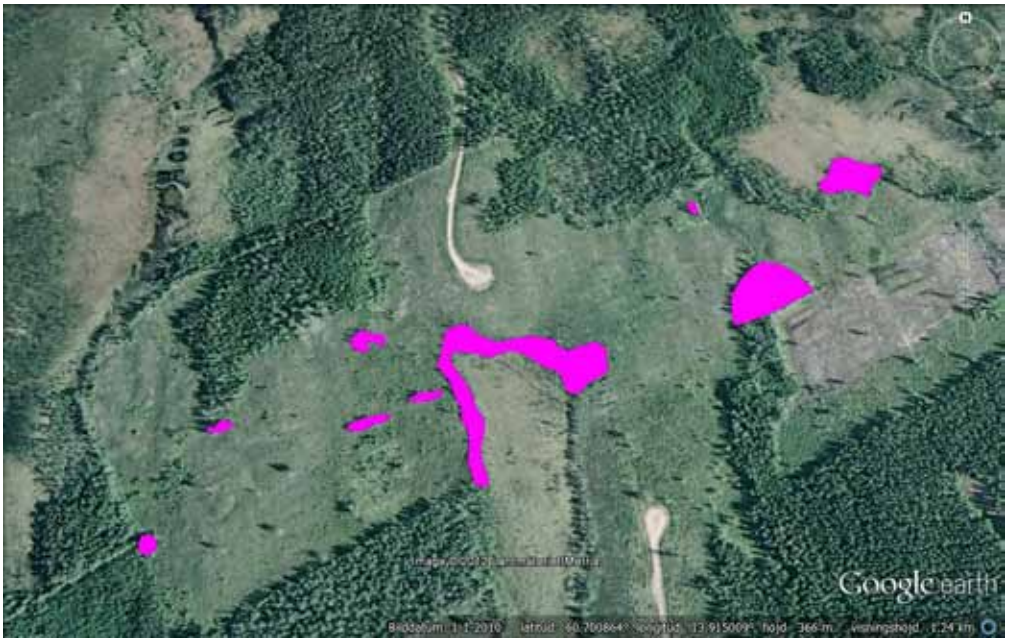
Quality

During field surveys the SSNC has documented several set-aside forests consisting of low-productive forests. Also, there are clear indications that forestry accounts for clear cuts and general nature consideration within their five per cent set-asides. To what extent such set-asides exist is hard to determine since there is no official data of the quality on the set-asides.



Voluntary set-asides in a landscape owned by Sveaskog. Part of these set-asides consists of a clear-cut felled in 1994/95[54], as seen in the picture below.
Source set-asides: skyddadskog.se and Sveaskog´s map of conservation forests. The information is gathered from Internet 2012-12-10. Graphics: Malin Sahlin. ©Lantmäteriet Agreement I2012/1272

©Lantmäteriet Agreement I2012/1272



The voluntary set-asides of Bergvik Skog at Högmyran, county of Dalarna. A logged area of approximately 21 hectares. The forest was clear-felled in 2003/2004[55] and, according to the SSNC review, the general nature consideration that is left on the clear-cut check well with the small areas that Bergvik Skog today report as voluntary set-aside areas. However, these "set-asides" are consisting of the general nature consideration mandatory by law at clear-fellings.
Source set-asides: skydadskog.se and Bergvik Skog´s map of conservation forests. The information is gathered from Internet 2012-12-10. Graphics: Malin Sahlin.
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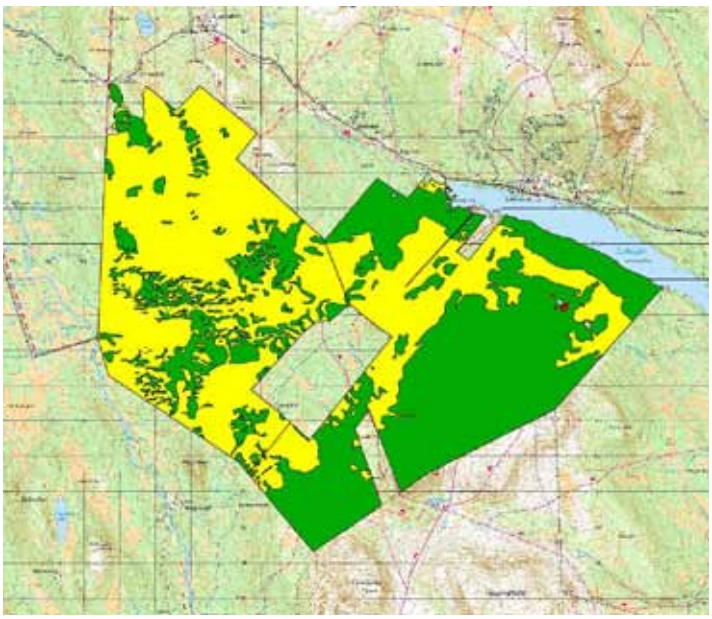
Long-term effectiveness of the set-asides

Voluntary set-asides are listed in the achievement of the environmental quality objective "Sustainable Forests". However, there is a large factor of uncertainty in the knowledge of how long the set-asides are exempted from forestry, since they can be exchanged back to production forests at any time. Also, SSNC has on several occasions documented that the large forest companies are selling their set-aside forests to non-certified land owners, which immediately opens up the area for logging unless the buyer chooses to allocate the area for conservation purposes.

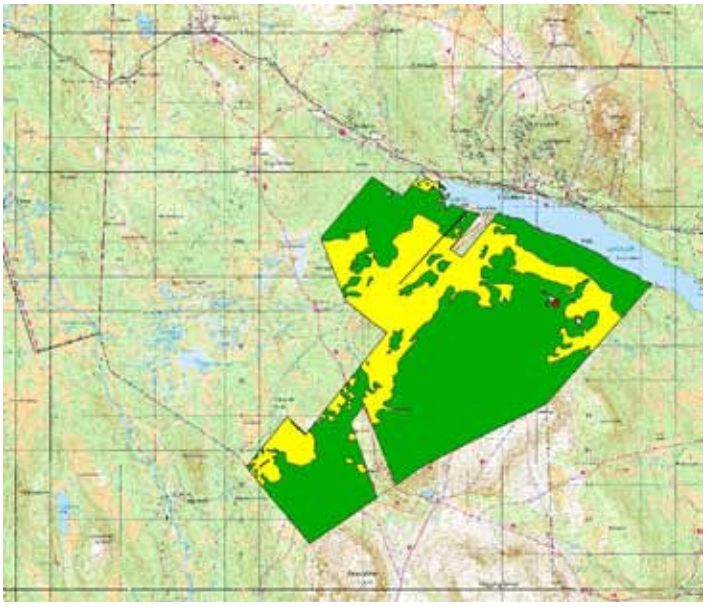
In Härjedalen, county of Jämtland, Bergvik sold approximately 4000 hectares of set-aside forest, Sörvallen. The area consists of a roadless wilderness area with very high conservation values as well as high recreational values. Shortly after the sale, three forest service roads were notified for logging. The Forest Agency approved the notifications, basically without any reservations for the very high biodiversity values. SSNC documented the area and contacted the County Administrative Board of Jämtland, which considered the area extremely valuable to preserve. Since Bergvik felt no obligation to take responsibility for their biologically important forest, the former voluntary set-aside now instead has to be purchased by money from the state in order to be protected it from logging.

Other large areas of Bergvik Skog´s voluntary set-asides are for sale in 2012.



The green fields show Bergvik´s land holdings. The yellow fields consists of voluntary set-asides.

Source set-asides: Bergvik Skog´s map of conservation forests. The information is gathered from Internet in 2011. Graphics: Linda Petersson. ©Lantmäteriet Agreement I2012/1272



The map show that a very large (approximately 4000 hectares) voluntary set-aside has disappeared from the land holdings of Bergvik Skog.

Source set asides: Bergvik Skog´s map of conservation forests. The information is gathered from Internet in 2012-11-15. Graphics: Linda Petersson. ©Lantmäteriet Agreement I2012/1272

Conclusions

The SSNC is fundamentally positive of certification as an instrument for companies and businesses to achieve improved objectives in regards to sustainability efforts. Therefore, SSNC was very driven in the efforts to develop the first Swedish FSC-standard. However, the SSNC field surveys have, for many years, proved that the FSC-certification does not measure up to its promises. Too many documented violations of the FSC-standard are committed in the forest, and the minimal consequences for these violations have led to only marginal improvements. The same "mistakes" of the major forest companies that were found in 2002 are still found today. Given that Sweden has had a FSC-standard since 1998, one should be able to expect greater positive changes in the forest landscape than the ones of today.

Sweden will not achieve its political adopted environmental quality objectives regarding forests. The objectives state that, "Habitats and naturally-occurring species associated with forests have a favorable conservation status and sufficient genetic variation within and between populations"[56]. Despite this ambitious clarification of the objective, FSC-certified forest companies systematically clear-fell forests with threatened and endangered species. The proportion of natural forest that has never been clear-felled is declining, as well as being fragmented, every day. Also, certified forest companies are notifying unregistered WKHs for clear-felling. Many of these would certainly have been logged if an NGO had not notified the landowner and authorities. The SSNC has filed several formal complaints regarding violations of the FSC-standard´s principle 6 – environmental impact. Since repetition over time of violations in regards to the principle 6 has been proven, practically without consequences for the certified companies, or – even worse – not to a noticeable change in the forest, the SSNC argues that FSC Sweden is not an effective instrument to improve the situation of the forest biodiversity.

Furthermore, the FSC-certified forestry has to comply with the first principle of the standard stating that forestry needs to meet the requirements of the national legislation. This stands in a stark contrast to the fact that 36 per cent of the loggings in the country does not live up to the minimum requirements within the legislation of environmental concerns at clear-fellings[57].

In order for FSC Sweden to regain its credibility, changes must be made – changes that will ensure that FSC-certification really makes a difference. A difference in the forest.

Olli Manninen

The Swedish Society for Nature Conservation Demands

- **Quality, transparency and long-term commitment for the voluntary set-asides, not at least under the FSC.**

  Today a large portion of the set-asides are completely unknown to the parliament, authorities and the general public, even though they are part of the environmental quality objective "Sustainable Forests". Reviews performed by the SSNC indicate that clear-cuts and general consideration taken at clear-cuts are included in the set-asides. This is not in line with the FSC-standard. To what extent such set-asides exist is hard to determine since there is no official data of the quality on the set asides. In addition, sales of set-aside forests have been documented by the SSNC.

- **Establish a practice for the point at which violations of the certification will lead to a suspended certificate.**

  In Sweden, no certified landowner has lost their certificate – despite documentation of repeated violations of the FSC-standard over time. The FSC-certification system with minor and major CARs implies that a forest manager shall implement corrective actions in order to ensure that deviations are not repeated. However, reviews conducted by the SSNC show that repeated deviations do occur, even when action plans have been implemented by certified landowners. Therefore there are major uncertainties in when "enough is enough". The practical consequence of this is that the FSC-system in Sweden is undermined every time deviations are documented.

- **FSC Sweden must clarify guidelines regarding the complaint procedure.**

  Today, each CB has its own procedure for handling complaints. In the long run this gets very confusing for stakeholders wanting to help improving the system by the complaint procedure. Coordination between certifiers and FSC Sweden is required for the system to be user-friendly for individuals who want to engage in the FSC. Also, this report shows significant deviations of the CBs in regards to their own routines. The complaint procedures must be uniform for all CBs and easily available to the public from the FSC website if the system is to be easy to use.

- **The Swedish standard for forest certification has to be improved.**

  The Swedish FSC-standard of today does not provide enough benefits from the environmental perspective. The standard is also in principle entirely focused on clear-cuts as the only management method. Alternative methods are today only mentioned in relation to voluntary set-aside forests[58]. Natural forests as well as habitats for endangered species are clear-felled under the cover of FSC despite the landowner´s knowledge of the species' occurrences. The loss of habitats for threatened species is the main reason that the state of forest biodiversity will continue to decline in Sweden.

Sebastian Kirppu

A warm thanks to all the wonderful people that have devoted their time to help us with the extensive field work.

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32 ibid

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35 For the clear-cuts that have not been visited by the SSNC, information of the clear-felling i derived from the landowner.

36 SGS Revision no 5, Certificate no: SGS-FM/COC-0213, Date: 02.10.28

37 Note: It has proven very difficult to identify all complaints that have been filed by the members of the SSNC why complaints before 2007 can have been filed without the author´s knowledge.

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58 Swedish FSC Standard for forest certification V2-1 050510, (page 75)

Environmental certification of businesses is often a reasonable way forward in order to achieve improved objectives in regards to sustainability efforts. Within the forestry of Sweden, certification does not only imply that forestry should be conducted in a sustainable matter, the FSC-certification is also, in practice, part of the politically adopted environmental quality objectives "Sustainable Forests" by the expectations of the parliament on the forest sector to "go beyond" the requirements of the legislation. Also, voluntary set aside forests, not at least according to certification, has been part of the package of excluding productive forests from forestry – a milestone under the environmental quality objective "Sustainable Forests". Although large parts of the voluntary set asides are not known by policy makers, authorities and the general public, they are rather uncritically included in the achievement of the objectives. Nor the general public or the government simply does not know where large portions of the set asides are located, what quality they consist of or for how long they will be exempted from forestry. Additionally, certification is seen as a part of the forest industry sector responsibility, a responsibility for the forest biodiversity that the sector are expected to undertake within the fundamental of the national forest policy; "freedom with responsibility".

Since 2009, SSNC has systematically reviewed the large forest companies' compliances with the Swedish Forest Stewardship Council (FSC) standard. SSNC was very driven in the efforts to develop the Swedish FSC-standard. However, SSNC field surveys have, for many years, proved that the FSC-certification does not measure up to its promises. Reviews of certified forest companies show significant deficiencies, both within the forestry practices carried out by landowners as well as deficiencies within the certification bodies that controls and audit the forest management. Field surveys followed up by formal complaints carried out by SSNC reflect a very negative trend for the forest biodiversity, especially in regards to the ongoing loss of biodiversity in Sweden, where natural forests and habitats for endangered species are being clear felled under the cover of FSC. SSNC left FSC Sweden in 2010 since formal complaints of repeated violations of the FSC-standard has not resulted in any major changes within the forestry in regards to the depletion of the forest biodiversity.

This report compiles the SSNC criticism towards the failures of the certification system within FSC Sweden.

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