



Stakeholder Forum Report

PEFC Sweden

Dutch Timber Procurement Assessment Committee
(TPAC)

July 17th, 2009

Introduction

The underlying document presents the contributions that have been posted on the *TPAC stakeholder forum* on PEFC Sweden. The forum is an essential element of the assessment procedure of the Dutch *Timber Procurement Assessment Committee* (TPAC), which assesses timber certification systems on behalf of the Dutch Procurement Policy.

The forum discussion is structured along the lines of the seventeen principles of the Dutch Procurement Criteria for timber (see Box 1). The forum was open for discussion from the 2nd of March until the 7th of April 2009. TPAC received six reactions from two sources.

Readers guide

The document is structured as follows. Per criterion the stakeholder contribution and a short summary are given. Thereafter, the related 'TPAC' criterion is listed and when provided, the reaction of the system manager. Thereafter, TPAC indicates how the post relates to the final judgement of TPAC. For the complete Final Judgement of PEFC Sweden please see TPACs public report <http://www.tpac.smk.nl/nl/s517/TPAC-home/c413-Documents-TPAC>

Box 1 – The 17 Principles of the Dutch Procurement Criteria*)

Sustainable Forest Management (SFM)

1. Legislation and regulation
2. Interests of stakeholders
3. Health and labour conditions
4. Biodiversity
5. Regulation functions
6. Production function
7. Contribution to local economy
8. Management system
9. Management group or regional association

Chain of Custody and Logo Use (CoC)

1. Chain of Custody system
2. Chain of Custody group certification
3. Logos and Labels

Development, Application and Management of Certification Systems (DAM)

1. Standard development
2. System manager
3. Decision making bodies and appeal procedures
4. Certification bodies and procedures
5. Accreditation

*) The complete Procurement Criteria can be found at <http://www.tpac.smk.nl/nl/s517/TPAC-home/c413-Documents-TPAC>

Remarks made on Principle 1. Legislation and regulation

P 1. Legislation and regulation

Author: Jessica Bekker, Greenpeace Netherlands

Posted: 3/23/2009 13:48

legislation

This shall be respected according to the Swedish PEFC, but still, in 2007, as much as 28 per cent of the final fellings carried out by private persons (many of them belong to PEFC-certified organizations) did not comply with environmental requirements of the Swedish Forestry Act, according to the Swedish Forest Agency. Final felling carried out by forest companies (some of them PEFC-certified) did not comply with the environmental requirements of the Swedish Forestry Act.

Summary: 28% of fellings by private persons do not comply with Forest Act.

Relevant Criterion: C 1.3 - Legal and regulatory obligations that apply to the forest management unit, including international agreements, are fulfilled.

Background Press release Skoggstilsynen (2008 04 07): *Miljöhänsyn i skogsbruket på fortsatt låg nivå*, (see annex 1)

Response from PEFC Sweden:

The results for large forest companies are at almost the same level and they have (most of them) dual certificates; PEFC and FSC. We do not have any information if PEFC certified forest owners are among those who the Forest Agency survey covered. But the results are brought to our CB 's attention and discussed at our calibration meetings (twice a year). If non-compliance is observed during internal or external audits corrective actions are taken. One should note that the non-compliance referred to is not that the forest owners knowingly break the law. The consideration according to legislation has been taken but not in the best possible way looking at what could have been achieved. The forest agency themselves see this as an educational issue and they have together with forest owners organisations started programs to educate forest owners. A positive trend can already be seen and we enclose a press release from Skogsstyrelsen *Bättre miljöhänsyn hos private skogsägare* [Appendix 4](#)

Response TPAC: TPAC notes that 28% is a very high level of non-compliance. However, the percentage does not distinguish between PEFC- or other certified forest, or uncertified forests, it also only pertains to private persons, the overall percentage will thus be (significantly) lower. TPAC is also informed that measures are taken to stop non-compliance and that there is a positive trend concerning this issue. TPAC therefore concludes that the criterion C1.3 is still sufficiently addressed.

Remarks made on Principle 2. Interests of stakeholders

P 2. Interests of stakeholders

Author: Malin Brännström, The National Association of the Swedish Sámi People

Posted: 3/25/2009 13:28

PEFC Sweden does not respect the rights of the Sámi people in adequate way

Sámiid Riikkasearvi / The National Association of the Swedish Sámi People (SSR) represent 43 Sámi villages in Sweden. One of its main tasks is to guard the economic prerequisites for reindeer herding. SSR does not consider that PEFC in Sweden respects reindeer herding, the indigenous rights of the Sámi people and Sámi culture in an adequate way. PEFC is not independent or transparent, since no other partners than the forest owners/economic stakeholders have any real influence in the system. The system is constructed and controlled by the forest sector. Since PEFC does not respect the rights of indigenous people, there is no protection within PEFC of the Sámi rights for grazing land within the reindeer herding area or for Sámi important sites. Since the economic stakeholders dominate at all decisions, other stakeholder groups, such as the Sámi, are not given equal rights in the decision making within PEFC. The requirements set up are to general to actually protect reindeer herding and the Sámi culture. To actually acquire that PEFC Sweden protects these interests they need first to respect the reindeer herding areas. As of today, it is possible to go to court and question the Sámi's right to land and still be certified within PEFC. The Sámi people are an indigenous people that live in Sweden, Finland, Norway and Russia. An important part of Sami culture is reindeer herding. Reindeer herding is a very space demanding occupation, constantly in need of different types of grazing areas. Furthermore, reindeer herding is very much affected by forest management. Hence, it has for a long time been a priority for SSR, to work so that forest management respects the needs of reindeer herding and Sami rights to land and water.

Summary:	PEFC Sweden is dominated by economic stakeholders; it does not respect or protect reindeer herding and the Sámi culture, and in case of conflict, FMUs can still be certified.
Relevant criteria:	<p>C 2.1 - The legal status of the management of the forest management unit and claims of the local population, including indigenous peoples, regarding the property/ tenure or use rights in the forest management unit or a portion thereof have been inventoried and are respected.</p> <p>C2.5 - Adequate mechanisms are in place for resolving disputes regarding forest management, property/usage rights, work conditions, or social services. <i>Guidance: In case of a conflict of significant dimension, the FMU will not be certified.</i></p>
Background	Statement from the National Association of the Swedish Sámi People (SSR (also SSNA)), by Malin Brännström (see annex 2).
Response TPAC:	The post is in line with the TPAC assessment of C2.1 and C2.5 that PEFC Sweden does not guarantee that 1) claims regarding property or use rights are sufficiently respected; and 2) mechanisms for dispute resolution are fully adequate. Both criteria are therefore partially addressed. TPAC also notes that there is little or no reference to the new PEFC Reindeer Policy in the documents that the Committee has consulted on this issue.

Remarks made on Principle 3. Health and labour conditions

P 3. Health and labour conditions

Author: Jessica Bekker, Greenpeace Netherlands

Posted: 3/25/2009 11:35

health and labour conditions

Laws and agreements on terms of work are supposed to be followed, as well as relevant international laws and directives according to the Swedish PEFC standard. Criteria 6.3.7 in the PEFC standard states the following: "The provisions contained in Sections 6.3.1 and 6.3.6 shall not apply to family-forest enterprises that do not have any employees or that collaborate with other family-forest enterprises." PEFC criteria 6.3.1 - 6.3 deals with labour conditions. This means that the social criteria are not necessarily needed to be followed in family-forest enterprises. This should be changed. The same labour conditions should be valid for all businesses, no matter if it is family related or not.

- Summary: Sound labour and health conditions are not guaranteed in family-forest enterprises.
- Relevant criterion: C 3.1 - The forest manager must take adequate health and safety measures, at least in compliance with relevant legislation and in accordance with ILO conventions, in order to protect the personnel, including contractors and their employees and, where appropriate, the local and indigenous population.
- Response: TPAC took the information of Section 6.3.7 into account in the assessment of SFM criterion 3.1. TPAC notes that although family enterprises are exempted from compliance with the PEFC criteria 6.3.1 and 6.3.6, they are obliged to comply with all Swedish legislation regarding health and labour. Bearing in mind that Sweden is a developed country with adequate health and labour legislation, TPAC considers this criterion to be sufficiently addressed.

Remarks made on Principle 4. Biodiversity

P 4. Biodiversity

Author: Jessica Bekker, Greenpeace Netherlands

Posted: 25.3.2009 11:37

recommendations of the Swedish Environmental Advisory Council and other criteria

Criterion 6.4.1: When substantially more than 5% of the land has been set-aside for conservation purposes, latitude may be given in the implementation of other parts of the standard regarding, for instance, the number of Active, profitable forestry (criterion 6.2.2), number of environmental trees (criterion 6.4.6) and number of hardwoods, stands dominated by deciduous trees (criterion 6.4.8). This kind of relief should not be accepted.

5 per cent set-aside forest is not in line with the 10 per cent protection level which scientists consider to be the minimum required in order to preserve biodiversity below the montane region in Sweden. Many companies and certification bodies interpret the 5 per cent requirement to mean they do not need to set aside more than 5 per cent of an area to nature conservation purposes, rather than using it as a minimum percentage guideline. The PEFC has to ensure that the next revised Swedish national PEFC standard regarding the amount of productive forest areas that should be exempt from forestry measures comes into line with the recommendations of the Swedish Environmental Advisory Council and with leading science on nature conservation (at least 10 per cent).

The information about which areas that are set-aside for conservation purposes and their nature conservation values should be made public and transparent to all stake-holders. Today, most of this information is not public and studies have shown that many of the voluntarily protected areas have low conservation values. All certified companies must make public which areas they are protecting voluntarily in order to prove to stakeholders that these areas are of a high conservation value and that they will not be logged. Maps of these areas should be issued immediately. The certification bodies must review and evaluate the selection of voluntarily protected areas. The forest companies should also carry out landscape planning and work with knowledgeable biologists who can conduct natural value assessments.

Criterion 6.4.3 deals with land having a high environmental value. In forest areas north of the Swedish province Dalarna and further up north, the following four criteria should be fulfilled in order to be defined as old-growth forest:

- Older natural regenerated forests.
- No or only insignificant loggings during the last 50 years or the area has continuously been covered with trees over several generations.
- An intermixture of very old trees. Coniferous forest older than 200 years.
- A significant amount of dead wood.

There are very few forests left untouched in this area. There are many stands of older forests that fulfil some of the criteria of being an old-growth forest. But in order to classify a forest as an old-growth forest, all four criteria must be fulfilled. The main parts of the older forests in the north of Dalarna are therefore classified as production forests. This means that almost all the forests can be logged any way, even if they are home to several threatened animal and plant species. This criterion needs to take other types of forests into account. Since only 5 % of the Swedish productive forest land consists of high conservation value forests it is important that all forests with high conservation values are protected.

Criterion 6.4.6 about Environmental trees and potential Environmental trees, states that the specified number of environmental trees can be reduced in the south of the country if they are large oaks or beeches; in the north, the number can be reduced if the stand comprises particularly large-diameter pines of a high commercial value and there are no suitable environmental trees or potential environmental trees. This number should never be reduced to less than 10 trees, even though there might be many environmental trees in the area.

Summary:

- 1) 5% set-aside is not sufficient to protect biodiversity in Swedish forests;
- 2) selection of set-asides is not transparent and not adequate to protect biodiversity;

3) definition of old-growth forests is too narrow, as a result, some old-growth forests are classified as production forests.

Relevant criterion: C 4.1 - Objects of high ecological value and representative areas of forest types that occur within the forest management unit are identified, inventoried and protected.

Background Swedish Environmental Advisory Council (Miljövårdsberedningen), *Skydd av Skogsmark*, 2007, page 116 Chapter 7.
(see annex 4 or the following link:
<http://www.regeringen.se/content/1/c4/27/15/ff603ac5.pdf>)
- Document contains the remark that more than 5% of the forest needs to be protected to ensure the protection of biodiversity.

Swedish Forest Agency (Skogsstyrelsen), *Skog för naturvårdsändamål*, Meddelande 2, 2002.
(see www.svo.se/forlag/meddelande/1543.pdf (only in Swedish)).
- Documents contains the remark that many of the voluntarily protected areas have low conservation values.

DN, Press release 2008-04-14 00:50, *Skogspolitiken hotar biologiska mångfalden*,
(see annex 4 or
<http://www.dn.se/DNet/jsp/polopoly.jsp?d=572&a=760542>)

Questions TPAC to PEFC:

1) TPAC is informed by PEFC Sweden that 10 to 15% of the PEFC certified forests is protected. The system manager is kindly requested to provide the source of this information.

2) Sources from Sweden indicate that the selection of set-aside areas is not adequate to protect biodiversity. The system manager is kindly requested to indicate how it is guaranteed that voluntary set aside areas contain forests with high environmental value.

3) Greenpeace remark on the definition of old growth forests is in line with TPACs concern on this issue. The system manager is kindly requested to indicate whether, given the narrow definition of old-growth, all the old-growth forest within the PEFC certified area, is protected. In addition, TPAC would like to know what the percentage of protected old-growth area is in relation to the total area of Swedish PEFC forest.

4) TPAC would like to know whether the intensive forest management, as described in the article "Skogspolitiken hotar biologiska mångfalden", is common practice in PEFC-certified forests.

Response from PEFC Sweden:

1) As explained this was/is a mathematical calculation on the average distribution of the 15 million ha non-productive land (i.e., forest land with a productive capacity of less than one cubic metre of timber per hectare per year) put on top of the requirement of the standard.

2) According to "S TD §6.4.1 Areas set aside for conservation purposes" the most environmental valuable areas should be set aside up to at least 5% of the total productive forest land. A plan based on certification requirements, including a map with classified aims, showing the environmental goals for the property, i.e. stands/sites within the reserved 5% limit in the certification. That this is the case is checked both on internal and external audits. In the event of an external inquiry regarding certification, the landowner shall provide information about nature conservation areas/measures.

Note: There is however no guarantee that the set aside areas contain forests with high environmental values! This due to the fact that on forest properties without areas with high environmental value, areas that have the best precondition to develop such values should be chosen up to at least 5%.

3) As said in answer to C4.1, "old-growth forests" (neither PEFC nor FSC have defined this type of forests in Sweden) are most often considered as key-habitats and when found on certified holdings they will be part of the 5% set-aside. We don't have any statistics on which type of forests that are set aside.

4) The forest management and the consequences of it as described in the article isn't common practice in Swedish forests. To give some perspective on what the authors of the article put forward we enclose an answer from two other scientists stating the opposite view. Replik till DN-debattörer Appendix 3 see also
<http://www.skogforsk.se/upload/Dokument/Nytt/2008-02.pdf>

Response:

The Dutch Procurement Criteria have a 5% set-aside as a guidance. A 5% set-aside is also included in the PEFC Sweden standard. The PEFC Sweden Technical document requires that the most important and valuable areas of a FMU are included in the set-aside, this is audited by certification bodies. TPAC feels however that it would be beneficial for transparency reasons to draw up statistics on which types of forests are set aside.

TPAC is also informed that in practice a higher percentage of the Swedish forests is protected because non-productive forest land with a yield under 1 m³/ha/year is protected by law.

Taking into account the PEFC Sweden criteria (see next page) related to objects and areas of high ecological value, TPAC concludes the criterion to sufficiently addressed.

<p>species and Ecosystems</p>	<p>C 4.1. Objects of high ecological value and representative areas of forest types that occur within the forest management unit are identified, inventoried and protected.</p> <p><i>Guidance: 5% is considered to be a relevant proportion.</i></p>	<p>S TD §6.4.1 Areas set aside for conservation purposes At least 5% of the productive forest land on certified holdings (other tree-covered land may also be included) should be set aside for conservation purposes, such as <i>Conversion No Intervention (CNI)</i> and <i>Conversion Environmental purpose Intervention (CEI)</i> stands. Holdings that have less than 20 ha of productive forest land and are devoid of areas having—or likely to have in the near future—a high conservation value are exempted from this requirement. In the selection and demarcation of these tree retention sites, priority must be given to areas that are important to biodiversity and are representative of the landscape. Top priority should be given to key habitats. ...</p> <p>S TD §6.4.2 Key habitats Key habitats that have been defined and registered by the National Board of Forestry shall be managed in accordance the Swedish PEFC’s policy on key habitat as established by the Board.</p> <p>S TD §6.4.3 Land having a high environmental value As regards woodland having a high environmental value, special procedures must be applied to prevent felling being carried out that contravenes legislation or regulations, or is in conflict with the spirit of the certification scheme.</p> <p>S TD §6.4.4 Wetland forest and ditching Wetland forest often has a long, uninterrupted history and therefore has a high conservation value. This type of land should usually be set aside for conservation in accordance with Section 6.4.1 above. Small areas of wetland should be excluded from productive forestry under the general provisions of the Forestry Act. New ditches must not be dug on previously un-drained land.</p> <p>S TD §6.4.5 Woodland edges, Buffer zones, Conservation/Retention sites Edges and buffer zones are important to biodiversity, soil protection, the protection of lakes and watercourses and as a transition to agriculture land. Suitable zones for such purposes should be established and managed in accordance with the guidelines (and general recommendations) contained in the Forestry Act. Areas to be demarcated as retention sites (primarily on snow-free ground) are: - small biotopes of special conservation value - if necessary, buffer zones adjacent to biotopes of special conservation value -</p> <p>S TD §5.1.1 Responsibilities of woodland owner under direct certification for Forestry certificate ... - On all certified holdings for which there is no Green forest-management plan, to implement a procedure for assessing the conservation value in stands scheduled for felling. ... - To monitor and to document, as appropriate to the scale and intensity of logging operations, important conservation measures that have been taken in forestry. ...</p> <p>S TD §5.1.1 and §5.1.3: Responsibilities of woodland owner under direct certification (5.1.1) / group certification (5.1.3) for forestry - On all certified holdings for which there is no Green forest-management plan, to implement a procedure for assessing the conservation value in stands scheduled for felling</p>
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		<p>S IC: p1. Requirements for forest holdings comprising up to 20 ha of productive forest land. The following particulars must be provided by the Forestry and Eco audit: 6. Nature reserves and protected habitats existing on the forest holding,... 7. Habitats and objects having a conservation value ... 8. Swamp forest having a Class 1 conservation value ... 9. Permanent heritages sites...</p> <p>S IC: p2. Requirements for forest holdings comprising more than 20 ha of productive forest land. <i>(in addition to the requirements for forest up to 20 ha)</i> 3. conservation goals on landscape level 4. At least 5% belong to... <i>Conservation...</i> (CNI)... (CEI). Areas having a high or special conservation value should be classified...</p> <p>S IC § 6.4.3 Areas having a high conservation value and nonproductive forest land Before logging...: 1. check... whether the site is registered with the authorities in respect of its conservation and heritage values 2. If the conservation value of the site has not been documented, an assessment of the conservation value shall be carried out using a method approved by the certifier.</p> <p>The areas listed below are managed in a way that gives particularly sensitive species a chance to survive, and encourages species to speak and constitute reference areas in the managed woodland landscape. 3. key-habitats 4. Old growth-forest/ older woodland that has grown from natural regeneration. Little or no logging has been carried out in the area over the past 30/50 years (depending on where in the country the woodland is located); or the area has been judged to have been continuously forested over several generations. There are a number of very old trees which, for conifers, should be 150/200 years old (depending on where in the country the woodland is located), and there must be a significant quantity of deadwood. In practice, most of these forests will fall within the scope of a key-habitat...</p> <p>... living conditions required by red-listed species must be heeded in the planning and execution of forestry operations. ...</p> <p>The category "Other woodland having high conservation value" also includes: - Stands that are entirely or in part meet the criteria for biotope protection as defined in the Environmental Code (though with no size limitation). - Abandoned meadow or pasture, overgrown managed land of a special conservation value, and small areas of farmland land in woodland clearings.</p>
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Remarks made on DAM Principle 1. Standard Development

→ *This post was redirected from SFM P2 to DAM P1.*

P 1. Interests of stakeholders

Author: Jessica Bekker, Greenpeace Netherlands

Posted: 3/23/2009 13:55

Stakeholder imbalance

According to Swedish PEFC all concerned stakeholders should have the same possibilities to participate when developing the PEFC standard. All stakeholders shall reach a consensus in the developing process. If they do not succeed, they are supposed to be divided into three category groups: Forestry organizations, Wood processing organizations/companies and Environmental/Social organizations. Problem here is that the environmental/social organizations are in minority, especially since no environmental organizations are represented among the stakeholders of PEFC. The economical interests are therefore in clear majority when the decisions are being made, which does not favor environmental and/or social issues.

- Summary: Economical interests dominate the process of PEFC standard development.
- Relevant criterion: C 1.2 - The standard development body comprises the relevant interested groups that serve the economic, social and environmental interests without undue dominance of one interest.
- Response: The comment is in line with the TPAC assessment: although all interested groups are invited, it is not guaranteed that undue dominance is avoided. TPAC notes that several key NGOs do not participate in the standard development body. The criterion is therefore partially addressed.

Remarks made on DAM Principle 4. Certification bodies and procedures

P 4. Certification bodies and procedures

Author: Jessica Bekker, Greenpeace Netherlands

Posted: 3/25/2009 11:40

Consequences for non-compliance

Swedish PEFC-certified forest companies often log forest land having high environmental values and key habitats, without there being any consequences. The work of the certification bodies needs to be better reviewed by the accreditation body, Swedac. The PEFC and the Swedac has to develop strong penalties for certification bodies that do not perform to the required standards of practice and ensure that continuous noncompliance results in suspension or withdrawal of accreditation. The PEFC and the Swedac shall give certification bodies the mandate to instigate temporary moratoriums on logging in forest land with high environmental values when a formal complaint has been filed, until the companies that plan to log comply with PEFC standards.

- Summary:** The consequences of non-compliance, when found by the certification bodies, are often not adequate. The work of the certification bodies needs to be better monitored by Swedac.
- Relevant criterion:** C 4.1 - The certification bodies are accredited on the basis of the requirements and guidelines in ISO 170211 'Conformity Assessment - Requirements for Bodies Providing Audit and Certification of Management Systems' and/or ISO Guide 65 (EN 45011) 'General Requirements for Bodies Operating Product Certification Systems' and preferably on the basis of specific supplemental requirements for performance of conformity assessments according to the standards for sustainable forest management and the chain of custody.
- Background:** Protect the Forest (Skydda skogen), Delin, A. & Nygren, P., Det går utför med naturvården i skogen! Exempelsamling, 2007
(See also the following link:
http://skyddaskogen.se/joomla/index.php?option=com_content&task=view&id=10&Itemid=7.)
- 449 examples of bad nature conservation in the forest, in both PEFC-certified forest companies and other companies.
- Response:** Further research did not indicate that Swedac is not adequately performing its task of monitoring certification bodies. TPAC therefore concludes that there is no reason to alter the assessment of this criterion, which is fully addressed. Furthermore, TPAC can not get into matters that go beyond the Dutch Procurement Criteria, such as the proposed moratorium.

Annexes:

- Annex 1: Press release Skoggstilsen (2008 04 07): *Miljöhänsyn i skogsbruket på fortsatt låg nivå,*
- Annex 2: Statement Sámi (SSR), provided by 'Malin Brännström' – SFM C 2.1
- Annex 3: Swedish Environmental Advisory Council (Miljövårdsberedningen), about the 10 per cent protection level, page 116 (Chapter 7) – SFM C 4.1
- Annex 4: Swedish article "Forest politics threaten biological diversity" – SMF C 4.1

Annex 1: Press release Skoggstilsen (2008 04 07): *Miljöhänsyn i skogsbruket på fortsatt låg nivå,*

Provided by: Jessica Bekker, Greenpeace Nederland

Link:

<http://www.svo.se/episerver4/templates/SNormalPage.aspx?id=38956&epslanguage=SV>

[Pressmeddelande 080407]

Miljöhänsyn i skogsbruket på fortsatt låg nivå

Den hänsyn som tas till natur- och kulturvärden i samband med avverkning ligger på en fortsatt låg nivå. Det visar Skogsstyrelsens inventering av så kallad generell hänsyn, det vill säga av den hänsyn som tagits till natur- och kulturmiljövärden vid föryngringsavverkning.

I samband med föryngringsavverkning ska enligt skogsvårdslagen hänsyn tas till natur- och kulturmiljövård. Några exempel på sådan hänsyn är att lämna hänsynskrävande biotoper och skyddszoner mot vattendrag, sjöar, skogliga impediment och åkermark. Andra exempel är att lämna äldre träd, högstubbar och död ved.

Skogsstyrelsen inventerar varje år om skogsbrukets avverkningar lever upp till skogsvårdslagens krav på generell hänsyn. Överlag är hänsynen till natur- och kulturmiljövärden sämre på de privata skogsägarnas marker än på de större skogsbolagens mark, och några större förändringar har inte skett under det senaste året. 28 procent av avverkningarna på privatägd skogsmark når inte upp till lagkravet, jämfört med 20 procent hos det övriga skogsbruket.

– Enligt det senaste resultatet finns det dock en antydning till att den tidigare negativa trenden hos de privata markägarna är bruten, men det är ännu för tidigt att dra några större slutsatser av detta, säger Malin Andersson, naturvårdsspecialist Skogsstyrelsen.

När det gäller naturvärden skall hänsynen utformas så att den biologiska mångfalden gynnas så mycket som möjligt. Rent konkret innebär detta exempelvis att en gammal sälj med lunglav eller en 350-årig grovgrenig tall skall prioriteras före en yngre björk eller nyskapad granhögstubbe. För att kunna göra en bra prioritering av vilken hänsyn som ska lämnas krävs det framförallt bra planering innan avverkningen. Bättre planering kan också vara förklaringen till varför bolagens avverkningar får bättre resultat än det privata skogsbruket, säger Malin Andersson.

– På många avverkningar hos de privata markägarna tas beslut om hänsyn från förarhytten samtidigt som avverkningen pågår, och många avverkningar sker även i mörker. Då är det svårt att göra aktiva val med bra prioriteringar för hygget som helhet.

Under våren kommer Skogsstyrelsen att besluta om en strategi för myndighetens arbete med att förbättra miljöhänsynen vid skogliga åtgärder. Läs mer om Skogsstyrelsens inventering av generell hänsyn samt resultat fördelat på ägarkategori och landsdelsnivå i dokumenten i den röda rutan uppe till höger.

Annex 2: **Statement Sami;** Sámiid Riikkasearvi / The National Union of the Swedish Sámi People

Including a map with an overview of the areas of current and past disputes between Sámi and Forest owners.

Provided by: **Malin Brännström, The National Association of the Swedish Sámi People (SSR)**



SÁMIID RIIKKASEARVI
Svenska Samernas Riksförbund - SSR

Umeå March 23rd 2009

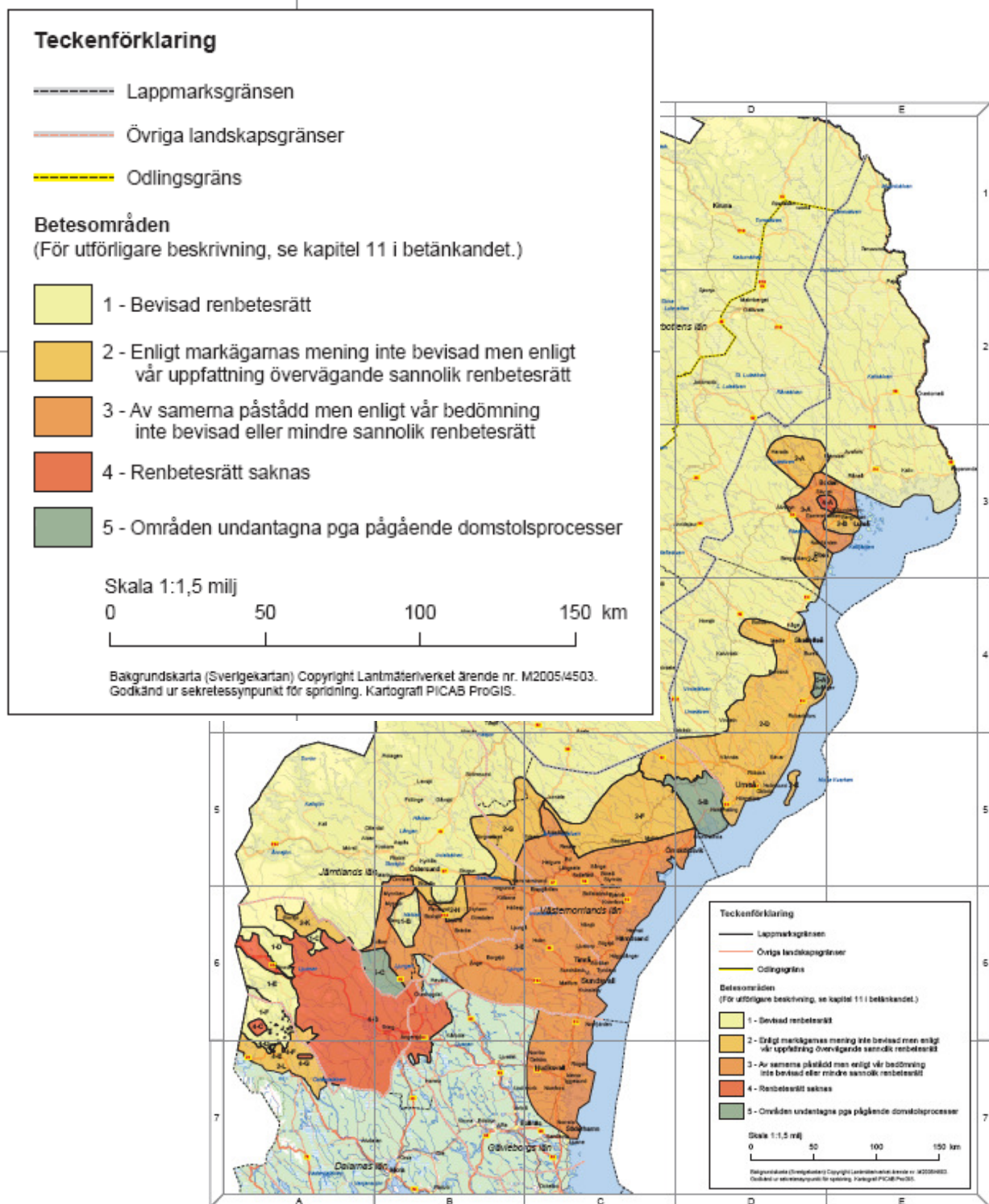
Statement on PEFC Sweden

Sámiid Riikkasearvi / The National Association of the Swedish Sámi People (SSR) represent 43 Sámi villages in Sweden. One of its main tasks is to guard the economic prerequisites for reindeer herding.

The Sámi people are an indigenous people that live in Sweden, Finland, Norway and Russia. An important part of Sami culture is reindeer herding. Reindeer herding is a very space demanding occupation, constantly in need of different types of grazing areas. Furthermore, reindeer herding is very much affected by forest management. Hence, it has for a long time been a priority for SSR, to work so that forest management respects the needs of reindeer herding and Sami rights to land and water.

SSR does not consider that PEFC in Sweden respects reindeer herding, the indigenous rights of the Sámi people and Sámi culture in an adequate way. PEFC is not independent or transparent, since no other partners than the forest owners/economic stakeholders have any real influence in the system. The system is constructed and controlled by the forest sector. Since PEFC does not respect the rights of indigenous people, there is no protection within PEFC of the Sámi rights for grazing land within the reindeer herding area or for Sámi important sites. Since the economic stakeholders dominate at all decisions, other stakeholder groups, such as the Sámi, are not given equal rights in the decision making within PEFC. The requirements set up are too general to actually protect reindeer herding and the Sámi culture. To actually acquire that PEFC Sweden protects these interests they need first to respect the reindeer herding areas. As of today, it is possible to go to court and question the Sámi's right to land and still be certified within PEFC.

Malin Brännström
Sámiid Riikkasearvi / The National Union of the Swedish Sámi People



List of disputes between Sámi and forest owners (locations are shown on the map in red and dark green):

Number 4A- The Sámi community did not have enough money to respond in court, therefore the judgment went the forest owners way.

Number 5A – the forest owners have cancelled their claims. Therefore the court has not any ongoing dispute in this area.

Number 5B - ongoing dispute, the Supreme Court will during this year decide whether the judgment will be tried.

Number 5C – ongoing dispute, the court of appeal will try the case during next year.

Nuber 4B – Five Sámi communities have lost grazing areas in the Swedish courts. The European court of Human rights has recently decided that the judgment will be tried there.

4c-4G - The Sámi community did not have enough money to respond in court, therefore the judgment went the forest owners way.

Annex 3 Swedish Environmental Advisory Council (Miljövårdsberedningen), about the 10 per cent protection level, page 116 (Chapter 7):

Reference: : - Miljövårdsberedningen (1997). *Skydd av skogsmark - behov och kostnader*. SOU 1997:97, Stockholm,
Relevant test - page 116 (Chapter 7) (below)
Complete tekst - <http://www.regeringen.se/content/1/c4/27/15/ff603ac5.pdf>

7 HUR MYCKET SKOG BEHÖVER SKYDD - BEDÖMNINGСУNDERLAG

Sammanfattning

Vid en hearing med forskare, där utgångspunkterna för att beräkna ett skyddsbehov på skogsmark diskuterades, framkom ett antal möjliga ansatser. Det förelåg även tveksamhet inför att göra en prognos på grund av vetenskaplig osäkerhet. På uppdrag av beredningen har en skattning av behovet av att skydda produktiv skogsmark nedan fjällnära gränsen genomförts. Med skydd avses markanvändning som syftar helt eller i vissa fall delvis till att uppnå skogsvårdslagens miljömål. Dagens naturvårdsbiologiska kunskap har applicerats på befintligt skogligt inventeringsunderlag. På ett flertal punkter har det varit nödvändigt att göra uppskattningar, då erforderliga data saknats.

Skyddsbehovet på lång sikt har beräknats genom att anta att 20 procent av den ursprungliga utbredningen av skogsmiljöer som är intressanta ur naturvårdssynpunkt - främst gammal och lövrik skog - behövs.

På lång sikt (ca 40 år) skulle enligt analysen 9–16 procent av skogsmarksarealen, beroende på landsdel behöva skyddas. I detta ingår även restaurering och återskapande av tillbakaträngda skogsmiljöer. På kortare sikt (10–20 år) skulle befintliga skogsmiljöer med höga eller snabbt utvecklingsbara naturvärden behöva skyddas. Omfattningen av dessa skattas till ca 900 000 ha eller 4,2 procent av skogsmarksarealen, utöver vad som idag är skyddat i lag.

På beredningens uppdrag har de rödlistade arternas fördelning på olika skogsbiotoper analyserats. Flest rödlistade arter återfinns i södra Sverige, framför allt i ädellövskog.

forts.

Annex 4 Swedish article "Forest politics threaten biological diversity" – SFM C4.1

Link: <http://www.dn.se/DNet/jsp/polopoly.jsp?d=572&a=760542>

"Skogspolitiken hotar biologiska mångfalden"

Publicerat 2008-04-14 00:50

Ledande svenska forskare varnar för att det nationella naturarvet äventyras: Vi skäms över våra beslutsfattares likgiltighet för miljön. Den svenska skogen har förvandlats till en jättelik odlingsyta. Där förr otaliga arter levde samman i harmoni dominerar numera helt gran, tall och inplanterade främmande trädslag. Denna skogsodling utgör ett hot mot den biologiska mångfalden vilket strider mot riksdagens miljö kvalitetsmål. Den svenska skogspolitiken vilar officiellt på att produktion av skogsråvara och miljö är likvärdiga mål. Men i praktiken har produktionen satts i första rummet. Bortåt 2 000 skogslevande arters överlevnad hotas på grund av den förda politiken. Vi är djupt oroad och skäms över att det rika Sverige inte arbetar effektivt för att nå nationella och internationella miljömål. Det skriver 14 ledande forskare i bland annat växtekologi, ekologisk zoologi och botanik.

Skriv ut Tipsa Textstorlek

ANNONS:

Svenskt skogsbruk har varit framgångsrikt och på många sätt tillhör de svenska skogarna de mest välskötta i världen. Produktiviteten har ökat med 50 procent under de senaste 80 åren. Under de senaste 15 åren har volymen växande skog ökat med 25 procent och den årliga avverkningen med över 30 procent. Skogsbruket utgör en grundbult i svensk ekonomi.

Framgångssagan har dock en baksida. Efter drygt 100 år av intensivt skogsbruk har vi idag ett landskap nästan helt dominerat av skötta skogar i olika stadier efter kalavverkning. Vi har bytt ut de naturligt förekommande skogsträden mot förädlade plantor. Den nya skogspropositionen betonar ökad produktion av skogsråvara och pekar ut stubbrytning, dikning, gödsling och intensivskogsodling av främmande trädslag som metoder för att uppnå detta.

Den svenska skogen blir en jättelik odling där gran, tall, och exotiska trädslag dominerar, liksom de få sädeslagen på våra åkrar. Denna skogsodling utgör ett hot mot den biologiska mångfalden.

Skogsbruket har medfört ett storskaligt ekosystemskifte och ett stort antal arter och processer som hör hemma i naturskogen har trängts tillbaka och blivit hotade. Komplexa relationer mellan tusentals växter och djur som reglerar flöden av energi, näringsämnen och vatten har rubbats. På den långa hotlistan finns vedtrådmossan och den större barkplattbaggen i gransumpskogar, kapuschongbaggarna på brandskadade tallar, vitryggiga hackspetten i gamla lövskogar. Alla dessa är exempel på arter som är utpekade på EU-nivå som speciellt viktiga att bevara. De utgör dock bara en handfull av de närmare 2 000 skogslevande arter vars överlevnad inte är långsiktigt säkrad i Sverige.

Den enskilt viktigaste orsaken till att dessa arter är hotade är att arealen och skyddet av kvarvarande naturskog inte räcker till för att härbärga livskraftiga bestånd. Detta trots att en central ambition, nollvisionen, i den svenska miljöpolitiken är att "alla naturligt förekommande arter ska bevaras i livskraftiga populationer".

Det moderna skogsbruket har även medfört att den genetiska sammansättningen hos de naturligt förekommande skogsträden förändrats genom att plantor och frön som används för förnying kommer från förädlade odlingar eller importer från andra länder. Genetiska undersökningar har visat att den naturligt förekommande svenska granskogen har en annan genetisk sammansättning än stora delar av det material som sprids över landet. Till detta kommer nu förslag på att i ökad omfattning plantera främmande trädslag, detta trots att Sverige undertecknat internationella överenskommelser om att inte sprida främmande arter i landet.

Förändring av genetisk sammansättning är vad som medvetet eftersträvas inom skogsbruket. Träd med en genetisk uppsättning som ger bättre produktion av virke än de

naturligt förekommande träden har odlats fram. Vad denna genetiska manipulation kan leda till på sikt för skogsträdens långsiktiga biologiska utveckling och interaktion med andra arter är dock idag helt oklart.

I Sverige finns en bred politisk enighet kring de nationella miljömålen, inklusive målet "Levande skogar". Samma mål är fastlagt inom EU och är i överensstämmelse med de internationella avtal som Sverige undertecknat. Och i det så kallade 2010-målet anges en nollvision som innebär att förlusten av biologisk mångfald ska ha upphört år 2010.

Idag är endast 5 procent av den produktiva skogsmarken nedom fjällregionen skyddad naturskog. Det är en låg andel i ett internationellt perspektiv. Globalt är drygt 12 procent av världens skogar skyddade och enstaka länder som Costa Rica har avsatt mer än 25 procent av sin skogsareal, ett fattigt land i jämförelse med Sverige. Även vår granne i öster, Estland, har ett reservatssystem som inom något år kommer att omfatta 10 procent av den produktiva skogsarealen.

Skogsstyrelsen föreslår nu att de nya miljömålen för perioden 2010-2020 ska innefatta en ökning av andelen skyddad naturskog nedom fjällregionen till närmare 8 procent. Förslaget innebär att vi får en större möjlighet att uppfylla de mål som vi i demokratisk enighet har antagit samtidigt som det innebär att 92 procent av Sveriges produktiva skogsmark finns tillgängligt för kommersiellt skogsbruk.

Den föreslagna ökningen utgör ett absolut minimum för att miljömålen över huvud taget ska vara möjliga att nå. Vi förordar att ambitionsnivån sätts högre och att minst 10 procent av den produktiva skogsarealen skyddas. Denna nivå är också i linje med vad tidigare utredningar har visat krävs för att skydda biologisk mångfald och överensstämmer med gällande internationella riktlinjer. Vidare måste självfallet målen implementeras i budgetarbetet så att det finns nödvändiga resurser för att ekonomiskt ersätta markägare.

Effekterna av de omfattande genetiska förändringarna av skogen måste utredas. Miljarderna plantor av annan genetisk bakgrund än den som naturligt selekterats fram har spritts över Sverige. Idag saknas såväl grundläggande dokumentation som uppföljande undersökningar av denna storskaliga manipulation. Det är oklart vilka genetiska bestånd som planteras var i landet. Och vilka eventuella effekter detta har lett till eller kan leda till i framtiden.

Vi vet att den genetiska variationen utgör grundstommen i den biologiska mångfalden, och att den är central för att skapa motståndskraft mot förändringar i bland annat klimatet. Ekologisk och genetisk forskning visar att ekosystemens och populationernas förmåga att motstå förändringar har en direkt koppling till den biologiska mångfalden. Det moderna skogsbruket riskerar därför att försvaga den ekologiska motståndskraften mot de dramatiska klimat- och miljöförändringar vi står inför. De förslag som lagts på intensivare skogsbruksformer och introduktion av främmade trädslag måste därför utsättas för en noggrann miljöprövning.

Den svenska skogspolitiken vilar på att produktion och miljö är likvärdiga mål. Samtidigt som produktionen i skogarna och avverkningsvolymerna sätter nya rekord så förpassas riksdagens miljömål för den biologiska mångfalden till en oviss framtid. Detta visar tydligt att den eftersträfvade balansen inte har uppnåtts. I praktiken har produktionen satts i första rummet. Vi är djupt oroade över utvecklingen och skäms över att Sverige - ett av världens rikaste länder och med en profil av att vara progressivt på miljöområdet - inte effektivt arbetar för att nå nationella och internationella miljömål.

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