

29th of November, 2017

Dear Herman Sundqvist, Mikael Damberg, Sveaskog, Stora Enso and SCA,

We are companies and organisations that value sustainability and strongly support sustainably sourced wood and paper products. It is with dismay we hear that FSC-certified forest companies harvest high conservation value forests and that woodland key habitats in the northwest of Sweden are not registered in 2017.

It is not acceptable that these remnants of high conservation value forests, which are unique and a part of the last wilderness in Europe, lack permanent protection and are being felled under the name of the forest certification FSC. This clearly undermines the credibility of the FSC. A sustainable forest management should not degrade biodiversity, species and natural environments.

We therefore demand the following:

- 1) Exempt all woodland key habitats and core areas (high conservation value forests) in Sweden from forestry and protect them permanently.
- 2) Forests in High Value Forest Landscapes and continuity forests, including forests with unknown biological values, must be visited in the field and inventoried prior to any kind of planned forestry operation and if high conservation values are discovered, these forests should be exempt from forestry.
- 3) Resume the registration of woodland key habitats in the northwest of Sweden. The woodland key habitat definition should be based on the current definition which covers important forest structures and features that are key to red-listed species with high specific habitat demands. However, woodland key habitats should not only consist of small biodiversity-rich forest patches which tend to result in isolation with strong edge effects (which further increases the likelihood of population extinctions) but also larger biologically valuable forest areas which are well-connected in a landscape perspective. The inventory methodology must be based on scientific nature conservation assessments, and not on production-orientated asserts.

If all of the above demands are not adhered to, we will consider to “pause” our trade of Swedish wood and paper products. We who do not trade with Swedish products will, without any doubt, avoid it.

Yours sincerely,

Erich Salber
Roman Wettstein
A.E. Vijfwinkel
Karl Lord
Paul Terhorst
Friedhelm Wegener
Kenneth Shepherdson
Paul Richardson

Alois Heinzmann Bürstenhölzer GmbH
Alpinewoods Roman Wettstein
Altrif Label BV
Aquabond.co.uk
ASG
AWA Couvert GmbH
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| Cassie Wheeler | Birmingham Innovations | United Kingdom |
| Aran Parker | Birmingham Innovations | United Kingdom |
| M A Andrews | Breeze House Designs Ltd | United Kingdom |
| Suzanne Watkins | Buk Ltd | United Kingdom |
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| Will Wilkinson | Charlton Abbots Forestry Ltd | United Kingdom |
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| Tom Wright | Cutwrights Ltd | United Kingdom |
| Dirk Lippert | Dataform dialogservices GmbH | Germany |
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| Jamie Reeman | Doric Crimped Ltd | United Kingdom |
| Dr. Manfred Möller | Dr. Schumacher GmbH | Germany |
| Petra Kaiser | Druckerei Hesse GmbH | Germany |
| Udo Dübbers | Druckerei Lage GmbH | Germany |
| Andreas Czentarra | Druckzone GmbH & Co. KG Cottbus | Germany |
| Uwe Südkamp | Duo Collection | Germany |
| Mark R Bailey | E & SW Knowles.co.uk | United Kingdom |
| Colorado Goldwyn | EQ Consultancy | United Kingdom |
| Rupert Goddard | Foster + Partners | United Kingdom |
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| Sebastian Heinrich | Friedrich Pustet GmbH & Co. KG | Germany |
| Lisa Block-Walther | Fries Holzsysteme GmbH | Germany |
| Garry Stevenson | G & S Specialist Timber | United Kingdom |
| Dallas Klein | Garden Centre | United Kingdom |
| Petra Kinzler | Goelz-Druck GmbH | Germany |
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| Estéban van Zeijl | Hermeta | Netherlands |
| Reinhold Kleinlein | Holz Reinlein GmbH | Germany |
| Jessica Sondermann | Internationale Geotextil GmbH | Germany |
| Oliver Strotmann | IPS Lamersdorf GmbH | Germany |
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| Fiona Edwards | JPA Furniture | United Kingdom |
| Ralf Lüke | Maderas Holztechnik GmbH | Germany |
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| Ute Brüne | Offset Company Druckereigesellschaft | Germany |
| Anneke van der Meijjs | PACOMBIGROUP | Netherlands |
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| Hohmann, Paul | PASCOE pharmazeutische Präparate GmbH | Germany |
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| Heinz-Werner Gassmüller | Philos GmbH & Co KG | Germany |
| Graham Turner | Powells Limited | United Kingdom |
| Tom Maertens | Putmans Next Level | Netherlands |
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| Arnold van Zalk | Reukema Papier Harderwijk B.V. | Netherlands |
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| Neil Haire | RG Group | United Kingdom |

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| Michael Keogh | RG Group | United Kingdom |
| M Bennett | RG Group | United Kingdom |
| Louis van der Merwe | RG Group | United Kingdom |
| Kieran brookes | RG Group | United Kingdom |
| Gregor Macintyre | RG Group | United Kingdom |
| Graham Taylor | RG Group | United Kingdom |
| Gavin McEvoy | RG Group | United Kingdom |
| Chris Broadhead | RG Group | United Kingdom |
| Bertie Pjetri | RG Group | United Kingdom |
| Chloe Brierton | RG Group | United Kingdom |
| Bill Smith | RG Group | United Kingdom |
| Alec Kitchener | RG Group | United Kingdom |
| Dave Norman | RG Group / Hytlan Limited | United Kingdom |
| Sacha Joseph | RGCM Limited | United Kingdom |
| Richard Versteeg | Royal Sens | Netherlands |
| Lynne Ashworth | RSW International Ltd | United Kingdom |
| Thomas Haas | Schirmer Medien GmbH | Germany |
| Robin Everaars | Schutte bouw | Netherlands |
| Neil Gunn | SJS Property Services LTD | United Kingdom |
| Serge Pladet | Smit Visual B.V. | Netherlands |
| Helen Lovell | Solid Floor Ltd | United Kingdom |
| Ilona Ofir | Sonett GmbH | Germany |
| Knut Sturm | Stadtwald Lübeck | Germany |
| Dr. Lutz Fähser | Former Forest Director, Stadtwald Lübeck | Germany |
| Franz Seyfferth | Swiss Post Solutions GmbH | Germany |
| Martin O'Farrell | The Deluxe Group | United Kingdom |
| Tony Cardew | Timber Link International Ltd | United Kingdom |
| Paul Jenner | Tullis Russell Coaters Limited | United Kingdom |
| Andrew Snape | Wood Mitchell Printers | United Kingdom |



FSC-logging by Sveaskog at Lannaberget, Ore Forest Landscape.

Photo: Bengt Oldhammer

Background information from the initiators of the open letter; Robin Wood, Germany and Protect the Forest, Sweden

Below are a few examples of critically threatened forests which reveal persistent and structural mismanagement, systematically conducted by FSC-certified forest companies.

SVEASKOG:

The state-owned forest company Sveaskog, one of Europe's largest forest owners, has over the last 4 years clear-cut hundreds of hectares of high conservation value forests in the large valuable Ore Forest Landscape in the county of Dalarna in Sweden:

<https://drive.google.com/file/d/1ZX7Sh74Rc4Z44RTLCJoaSZqPTwOzeHLP/view>

Recently, Sveaskog clear-cut 40 hectares of an acknowledged high conservation value forest in Brännvinsberget in Ore Forest Landscape where 40 different red-listed and indicator species had previously been found:

https://drive.google.com/file/d/121UkqtJ_gBATdnc9LDO__3Gpwgj_B6G4/view?usp=sharing

Many more valuable forest areas in Ore Forest Landscape are planned to be felled by Sveaskog.

Moreover, Sveaskog plans to clear-cut a high conservation value forest in Melakträskliden in the municipality of Arvidsjaur in north of Sweden. See photos of the forest here:

<http://www.norrbotten.snf.se/wordpress/sveaskog-vill-avverka-skog-av-nyckelbiotopklass/>

Sveaskog also plans to clear-cut biologically valuable forest at Brännliden in the municipality of Arvidsjaur which is surrounded by clear-cuts and plantations. See photos of the forest in Brännliden here:

<http://www.norrbotten.snf.se/wordpress/brannliden/>

Furthermore, the unprotected and biologically valuable 1,300 hectare forest landscape with a mosaic of older natural pine and spruce forests in Rävdaalen in the municipality of Gällivare in the north of Sweden, where 80 different red-listed species have been found, is at risk of being fragmented by Sveaskog. Local villagers have been struggling to protect the area over the last 2 years. The County Administration Board is planning to do inventories in the area next year since the area is of possible interest of a nature reserve establishment. However, Sveaskog plans to harvest socially valuable forests within the area already this year.

STORA ENSO:

Swedish-Finnish forest company Stora Enso is planning to clear-cut high conservation value subalpine forest on a private owner's land which is not FSC-certified, south of the lake Messlingen in the county of Härjedalen in Mid-Sweden where a total of 37 different red-listed and indicator species have been found. See photos from the forest here:

<https://drive.google.com/file/d/1TkDEyaqweEHoyr-7mLKdajFuKElrMfij/view>

Subalpine forests of significance for biological diversity should be exempt from forestry measures according to Annex 10 in the Swedish FSC standard. After protests from a large number of environmental NGOs, Stora Enso has decided to reevaluate the future management of the forest area planned to be clear-cut at Messlingen. It will not conduct any logging until the reevaluation is completed.



SCA:

Greenpeace is currently running a large campaign aimed at the Swedish paper giant Essity which receives much of its pulp from the Swedish forest company SCA. SCA and three of its external suppliers felled over 23,000 hectares of forest within high conservation value forest landscapes between 2012-2017, while another 22,000 hectares are still threatened by felling:

http://www.greenpeace.org/international/Global/international/publications/forests/2017/GP_Essity_forests_report.pdf?utm_campaign=Press%20Release&utm_source=Link&utm_medium=AMS

Despite the current threats to high conservation value forests described above, the Director General of the Swedish Forest Agency, Herman Sundqvist (former Head of Forestry of Sveaskog), decided to “pause” the registration of *woodland key habitats* in northwestern Sweden in March 2017 till the end of 2017. A woodland key habitat is a forest area that is of major importance for the flora and fauna and often harbors endangered and rare species. According to the Swedish FSC standard, woodland key habitats must be exempted from felling (criterion 6.2.1S b).¹

The Swedish Forest Agency is heavily influenced by the forest industry and therefore plans to modify the definition of woodland key habitats including the inventory methodology prior to the resumption of registration in 2018. The “pause” process has been strongly criticized by a number of actors, including officials from the Forest Agency itself, as well as by representatives of other authorities, researchers and non-profit conservation organizations. 120 forest scientists and officials from the Swedish Forest Agency and the County Administrative Boards sent a letter of appeal to Director General of the Swedish Forest Agency in April 2017:

https://drive.google.com/file/d/0B9HP_Rf4_eHtWmZZb1liU2x2TIE/view?usp=sharing

Also, an opinion piece signed by seven of the scientists was published in the Swedish daily paper Dagens Nyheter on the 11th of April 2017:

https://drive.google.com/file/d/0B9HP_Rf4_eHtMVctZIJZSGtzQUE/view?usp=sharing

Woodland key habitats are intended to be an essential part of rational forest protection planning, and the decision to “pause” the registration of woodland key habitats is highly inappropriate since it risks exacerbating this aspiration significantly. There is a considerable risk that the new woodland key habitat definition and methodology in 2018 will be weakened. Further, the resumption of the registration of woodland key habitats in 2018 will not guarantee the protection of these valuable biotopes since they lack formal protection. Every year, many registered woodland key habitats are clear-cut or negatively affected by felling.^{2,3}

ROBIN WOOD

wald@robinwood.de
www.robinwood.de

PROTECT THE FOREST



info@skyddaskogen.se
www.skyddaskogen.se

¹ FSC Sweden (2010). *Swedish FSC Standard for Forest Certification including SLIMF indicators*;
<https://se.fsc.org/preview.fsc-forest-management-standard-for-sweden.a-772.pdf>

² Swedish Forest Agency (2016). *Nulägesbeskrivning om nyckelbiotoper* (only in Swedish);
http://shop.skogsstyrelsen.se/shop/9098/art33/84164433-105ca2-Nyckelbiotoper_webb.pdf

³ Skogsland (13-11-2016). *3500 nyckelbiotoper skadade vid avverkning (3,500 woodland key habitats damaged by felling)*; only in Swedish);
<http://www.landskogsbruk.se/skog/3500-nyckelbiotoper-skadade-vid-avverkning/>