

Complaints against DNV GL and Sveaskog

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Note: this version of the document does not contain the email exchanges that were originally appended to it.

1 Complaints against DNV GL

1.1 Njuöniesvarrie

The forest at the mountain of Njuöniesvarrie near Sorsele consists of both pine forest with a history of fire and a rich supply of dead wood in various stages of decay, and of old slow-growing spruce forest with a lot of hanging lichens and some goat willow and aspen. There are logging plans filed for a total of 110 hectares.¹ On the mountain there are three woodland key habitats with pine forest, registered by Sveaskog. A total of 26 red-listed species have been found in the areas planned for logging, as well as 14 additional signal species. Four of the red-listed species are VU, and one, *Antrodia infirma*, is EN. At the moment, the logging plans are suspended since BirdLife Sweden has asked the county administrative board to assess whether the logging is permissible under the Species Protection Ordinance, since the area is important for the three-toed woodpecker.

¹Logging plan numbers A 22699-2016, A35486-2016, A35487-2016, A38715-2015, A38714-2015 and A38713-2015 .

The local chapter of the Swedish Society for Nature Conservation (SSNC) in Sorsele has made a formal complaint to DNV GL, saying that Sveaskog has not correctly assessed the conservation value of the forest at Njuöniesvarrie, and that the standard does not allow the forest there to be logged. In their reply (on the 11th of February 2019), DNV GL says that they find no deviation from the standard.

Protect the Forest asserts that DNV GL is wrong in their assessment. Consider that a Forest Agency study found that woodland key habitats contain 19.2 red-listed and signal species on average in woodland key habitats². In this forest, twice that amount is found. Moreover, there are many finds of red-listed species in the area that Sveaskog plans to log, outside the planned environmental consideration.

A further complication: it has come to light that the Forest Agency has registered two woodland key habitats (N 1184-2015 and N 1186-2015) at Njuöniesvarrie in 2015, one of which overlaps with one of Sveaskog's planned loggings. These woodland key habitats cannot be seen on the public map at Skogens Pärlor, but their existence is confirmed in an email on the 4th of February 2019 from a Forest Agency employee. She also sends a map of where they are to be found, and says that Sveaskog knows about these woodland key habitats.³

It thus seems clear that Sveaskog has planned to log a woodland key habitat. We think this case should be examined again, showing special attention towards the the Forest Agency woodland key habitat and the many red-listed species already found by the Sorsele SSNC.

2 Complaints against Sveaskog

2.1 Lill-Skarjak

The forest stand is 33.8 hectares and logging plans were filed with the Forest Agency on the 14th of July 2016 (logging plan number A 30009-2016). It is located on the western shore of lake Uddjaure south of Arjeplog in Norrbotten.

According to Criterion 3.1 in the current Swedish FSC standard, "Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies." The Sami reindeer-herding village of Maskaure had agreed during a consultation in 2016 that the forest at Lill-Skarjak could be logged. But they have changed their minds.

Leif Lundberg⁴, a representative of the Sami village, says he thinks they have the right to change their minds. He says: "The areas which are logged are so large, and now the company [Sveaskog] takes the last remnants. All older forest here is rich in hanging lichens which the reindeer need during the winter

²www.skogsstyrelsen.se/globalassets/om-oss/publikationer/2017/biologisk-mangfald-i-nyckelbiotoper.pdf

³To read the email exchange and see the map images, see the bottom of this webpage: <https://www.skogsgrupp.se/sks-tysta-medgivande/>

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and early spring. Logging this forest is not right. More than half of all forests in Maskaure reindeer-herding village have already been logged. We have the right to live and make our living here, but Sveaskog does not listen to us.”

Early in April, 2019, Sveaskog and Maskaure reindeer-herding village held another consultation, where the village asked Sveaskog not to log the forest. But Sveaskog refused, saying the village had already signed the papers to allow the logging. This is again according to Leif Lundberg.

If consent and delegation of control is to have any meaning, it must also include the ability to withdraw consent once it is given. This is especially true where the balance of power is uneven, as in this case. If it is not possible to withdraw consent, then consent given under duress can be upheld as if it is true consent. As for delegation of control, if it cannot be withdrawn once given, then control does not truly reside with the Sami but with the forest company.

What about the conservation value of the forest?

According to Indicator 6.1.7 in the current Swedish FSC standard 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”.

Björn Mildh has asked Sveaskog for their environmental assessment of Lill-Skarjak three times (11th of February, 7th of March, and 7th of August, see Appendix ??), but he has not received any reply.

On the 18th of March, representatives of 12 environmental organizations sent an open letter⁵ to Sveaskog, asking them not to log the forest at Lill-Skarjak (along with a list of other forests with high conservation value).

On the 6th of March 2019, the county administrative board in Norrbotten asked Sveaskog to put off their logging plans so that the county administrative board could assess the conservation value of the forest stand for possible inclusion in a nature reserve. But Sveaskog refused. See Appendix ??.

On the 22nd of April, Sveaskog sent a harvester to log the forest at Lill-Skarjak. Two persons who were against the logging were then at the forest to talk to the driver of the harvester. They convinced him to contact the persons responsible at Sveaskog, instead of proceeding with the logging. Sveaskog then agreed to put off the logging.

The county administrative board in Norrbotten has now assessed the conservation value of the forest at Lill-Skarjak. According to a newspaper article in Pitetidningen on the 11th of August 2019, Frédéric Forsmark at the county administrative board says: “We found many redlisted species. The forest has a fairly high age and a lot of hanging lichen. It lies close to an area which will become a nature reserve (Skarjak) and is suited to becoming part of that reserve.”

To sum up, we consider that Sveaskog has not followed Criterion 3.1 and Indicators 6.1.7 and 6.2.1.

⁵<http://www.skyddaskogen.se/sv/om-oss/rapporter-och-dokument/brev-och-inspel?view=download&id=84>

2.2 Loggings and planned loggings in forests with high conservation value near Sorsele

Near Sorsele in Västerbotten county, Sveaskog has:

- Planned to log in the Njuöniesvarrie area, see complaint about DNV GL in section 1.1.
- Logged 11.5 hectares of forest with high conservation value on Abmoberget, and has filed further logging plans in the same area.
- Filed two logging plans in the high conservation value forest Abmobäcken.
- Filed four logging plans in the forest and mire complex Stormyran – Holmyran – Ardnasåjvvie, in forests of high conservation value.

We believe that the loggings and planned loggings in these areas around Sorsele are a violation of Indicators 6.1.7 and 6.2.1.

2.2.1 Abmoberget

According to environmental assessments done by the county administrative board: "Abmoberget is a large, un-fragmented forest area with very high conservation value because of the area's size, very small impact from forestry, and natural structures such as remains of old forest fires, old trees, dead wood, and natural swamps. The county administrative board considers that the area's high conservation values would be damaged considerably by forestry or other exploitation."⁶

Abmoberget has also been extensively surveyed by the local SSNC. They have found a total of 49 redlisted and signal species in the area. Fragmenting such a large and valuable forest area cannot be compatible with FSC Indicator 6.2.1, but Sveaskog has logged 11.5 hectares of forest there (logging plan A 55469-2018). Sveaskog has also filed logging plans for seven other areas on Abmoberget.⁷

Sveaskog has been asked multiple times not to log these forests, see for example this open letter from 14 environmental organizations.⁸

2.2.2 Abmobäcken

East of Abmoträsket, 15 km south of Sorsele, lies a mosaic of mire, small tarns, streams and forest, where Sveaskog has filed logging plans A 31526-2019 (20 hectares) och A 31528-2019 (21 hectares) on 2019-06-25. It is difficult to imagine that sufficient border zones toward the wet areas could be left when logging these small forested areas in the mosaic, and the hydrology of the area would

⁶See forest number 113 in the report "Skyddsvärda statliga skogar i Västerbottens län".

⁷Logging plans A 55469-2018, A 52675-2015, A 45017-2014, A 51678-2014, A 48946-2014, A 48945-2014, A 48943-2014, A 51673-2014

⁸<http://www.skyddaskogen.se/sv/om-oss/rapporter-och-dokument/brev-och-inspel?view=download&id=84>

be damaged by a logging. Besides this, the area likely has high conservation value: a cursory survey yielded 12 red-listed species, of which two are VU, and 7 additional signal species, and more species would probably be found with a more detailed assessment.

2.2.3 Stormyran – Holmmyran – Ardnasåjvvie

This is a complex of old spruce forest and mire located 15 km east of Sorsele. Here Sveaskog has filed logging plans for a total of 45 hectares. The logging plans are:

- A30839-2019, 28.1 hectares, filed on 2019-06-20
- A43077-2017, 10.3 hectares, filed on 2017-09-15
- A30844-2019, 2.3 hectares, filed on 2019-06-20
- A31049-2019, 4.7 hectares, filed on 2019-06-24.

There is an earlier find of *Antrodia infirma* (EN) in the area. This is an endangered polypore fungus for which the Forest Agency recommends that the forest not be logged. A quick survey of the area in logging plan A30839-2019 found 12 red-listed species and 9 other signal species. Remarkably, one of these species was *Skeletocutis lilacina* (VU); this is only the seventh find of this vivid purple polypore in Sweden. More species would probably be found with a more detailed assessment.

2.3 Sveaskog’s assessment of environmental values for de-registered woodland key habitats

On the 24th of April, 2019, Protect the Forest and Greenpeace published the report ”The old-growth forests threatened by the state”.⁹ The report examines Sveaskog’s de-registering of areas earlier classed as woodland key habitats, and investigates what conservation values a sample of these areas have. For details, read the report.

But as a summary: Sveaskog and the other large forest companies are responsible for registering their own woodland key habitats. They let the Forest Agency know which areas are registered by periodically sending them an updated map layer in GIS with woodland key habitats, which becomes publicly available at Skogens Pärlor. But woodland key habitats can be removed as well as added to the updated map layer.

By comparing old and new map layers, it is possible to find the woodland key habitats that have been de-registered.¹⁰ Since January 2015, Sveaskog has de-registered 2,200 hectares of previous woodland key habitats (of which 200 hectares has instead become nature reserves). According to Sveaskog, they

⁹<https://www.greenpeace.org/sweden/english/2689/the-old-growth-forests-threatened-by-the-swedish-state/>

¹⁰<https://www.skogsgrupp.se/bolagens-borttagna-nb/>

are conducting a quality assurance process where they de-register woodland key habitats that are not good enough. But note that Sveaskog has already conducted such a process that ended in 2012¹¹, where they also brought in external expertise (according to a former employee). We wonder whether this process is now driven by the desire for more timber, rather than correcting genuine mistakes in the first process of registering woodland key habitats.

Many of these de-registered woodland key habitats are still voluntarily set aside. But voluntarily set-aside forests can be switched out, and by Sveaskog's own policy, this is not supposed to happen with woodland key habitats. Some of the de-registered woodland key habitats are not set aside any more, and some are planned to be logged. The question is whether Sveaskog is adequately assessing the quality of these forests before they de-register them as woodland key habitats.

In the report, we have documented our assessment of the conservation value of a sample of de-registered woodland key habitats. We found that several of them have high conservation value, with 20-30 red-listed species and signal species. Note that a Forest Agency study found that woodland key habitats contain 19.2 such species on average¹².

We have asked Sveaskog to share their documentation of the assessment of the environmental value of the de-registered woodland key habitats in the report (see Appendix ?? for our questions and their replies). They reply with generalities and have not supplied such documentation, though they do say that this is their aim eventually.

If such documentation is not forthcoming, we must conclude that Sveaskog are not following Indicator 6.1.7 and risk breaking 6.2.1.

¹¹See e.g. page 4 in: <https://www.sveaskog.se/globalassets/trycksaker/forum-sveaskog/2012/forum-sveaskog-1-2012.pdf>

¹²www.skogsstyrelsen.se/globalassets/om-oss/publikationer/2017/biologisk-mangfald-i-nyckelbiotoper.pdf