



Naturskyddsföreningen
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Naturskyddsföreningen
Örebro län

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To:

The European Commission

The European Parliament

OPEN LETTER

Unique Swedish calcareous coniferous forest felled in violation of the EU Habitats Directive – now another calcareous coniferous forest at risk

One of Stockholm County's most species-rich calcareous coniferous forests with ground-living fungi in Vamby in Norrtälje municipality in Sweden was recently logged - despite being an international prioritised habitat type in need of special areas of conservation, according to the EU Habitats Directive. Requests of legal protection of the forest from NGOs were ignored by the Swedish authorities.

Now, another species-rich calcareous coniferous forest is planned to be felled in Garphytteklint in Örebro municipality. The forest is hundreds of years old where the oldest pine trees are 380 years old. The forest is home to 35 red-listed species. The forest is also part of an important water protection area as well as a recreational area with cultural remains of old croft remnants and old mine voids. The cultural remnants are now partly damaged by a newly built road, with increased risk of hazardous water contamination, especially from the old mine voids. The County Administrative Board previously proposed a nature reserve in the area but due to reluctance from the landowner, the process is now cancelled. The forest might be felled now in July.

Calcareous coniferous forests are rare in both Sweden and Europe. It is one of Sweden's most threatened natural forest types - mainly due to logging. Due to the calcareous content of the soil, these forests harbour a species-rich and unique flora. Calcareous coniferous forests are included in the forest habitat [Fennoscandian herb-rich forests with Picea abies](#) (9050) and [Western Taiga](#) (9010) in the EU Habitats Directive. From an international perspective, Fennoscandian herb-rich forests with Picea abies are particularly important to preserve.

According to official reporting under the EU Habitats Directive, [14 of 15 forest habitats](#) in Sweden do not have a favourable conservation status. The ongoing logging of these habitats violates the Habitats Directive which should ensure the conservation of natural habitats and of wild fauna and flora. Sweden is committed to achieve favourable conservation status for all forest habitats in the EU's Habitats Directive. The conservation status of Fennoscandian herb-rich forests with Picea abies and Western Taiga in the EU is bad.

Logged calcareous coniferous forest in Vamby

The now logged forest in Vamby was deregistered as a woodland key habitat (a forest area with documented high conservation values) by the Swedish Forest Agency in November 2021, at the request of the landowner. This was in accordance with a court decision in the Administrative Court of Appeal in Stockholm in June 2021. The high conservation values of the forest remained despite the deregistration of the forest as a woodland key habitat.

Hot-spot forest site with endangered soil fungi in Vamby

The logged forest in Vamby was one of Stockholm County's top sites for valuable and endangered ground-living fungi in calcareous coniferous forests. There were unique and large concentrations of mycelia of red-listed fungi species which are rarely found in other places in Sweden. In total, 28 species of conservation concern, including 14 red-listed species, were found in the forest (see species list in the end of this open letter). Of these species, the endangered *Hydnellum mirabile* (EN) is globally red-listed according to IUCN. Sweden thus has a major international conservation responsibility for *Hydnellum mirabile* (EN) as well as for the vulnerable *Hydnellum fennicum* (VU) and *Gomphus clavatus* (VU). In addition, species of responsibility for the municipality of Norrtälje grew in the forest, such as *Hydnellum lundellii* (VU) and *Cortinarius meinhardii* (NT). Several of these species are included in a national action plan for the conservation of red-listed fungi *Sarcodon* and *Gomphus clavatus*.

Authorities act irresponsibly

The Swedish Forest Agency replied earlier this year that they were unwilling to re-evaluate their earlier assessment not to prioritise the calcareous coniferous forest in Vamby for formal protection.

The County Administrative Board received a demand for formal protection of the calcareous coniferous forest in Vamby already on the 7th of July 2021 from Stockholm's Mushroom Friends. In February 2022, Protect the Forest and the Swedish Society for Nature Conservation also demanded formal protection of the area. However, the County Administrative did not reply until they received a phone call from Protect the Forest in April 2022, stating that they did not have the resources to work with the case. Once the felling of the calcareous coniferous forest had started, the County Administrative Board (9 June 2022) issued a decision stating that they did not intend to take any action on the matter. They referred to the Swedish Parliament's decision regarding the Swedish government's bill [Strengthened property rights, flexible forms of protection and increased incentives for nature conservation in forests with voluntary measures](#) (free English translation of Swedish original title) that formal protection of forests mainly should be based on voluntary measures, on the initiative of landowners and be a main working method for the authorities.

International commitments exempted from voluntary protection in the government's proposal

According to the Swedish Government's Bill 2021/22:58, exceptions from voluntary forest protection are justified due to, for example, international commitments or other particularly important/urgent public interests. The basis for assessments of exceptions from voluntary protection in decisions regarding land protection is found in the Swedish Environmental Code.

Chapter 1. Objectives and area of application of the Environmental Code

Section 1 The purpose of this Code is to promote sustainable development which will assure a healthy and sound environment for present and future generations. Such development will be based on recognition of the fact that nature is worthy of protection and that our right to modify and exploit nature carries with it a responsibility for wise management of natural resources.

The Environmental Code shall be applied in such a way as to ensure that:

...

2. valuable natural and cultural environments are protected and preserved;

3. biological diversity is preserved;

...

National and international conservation responsibility

Calcareous coniferous forests are designated as prioritised forest types for formal protection, according to the [Strategy for Formal Protection of Forests in Stockholm County](#). Sweden has an international responsibility to conserve calcareous coniferous forests. [The Swedish Environmental Protection Agency](#) writes in its guidelines for Western Taiga and Fennoscandian herb-rich forests with *Picea abies* that such habitats normally require long-term protection of the forests, as forestry is not compatible with safeguarding the habitats in a favourable condition. From an international perspective, the areas of species-rich calcareous coniferous forests in Gotland, Stockholm, Uppsala and Jämtland Counties in Sweden are considered particularly important to highlight.

Typical species and Natura 2000

Typical species in the now logged calcareous coniferous forest in Vamby such as the near threatened *Hydnellum aurantiacum* (NT), *Phellodon niger* (NT), *Cortinarius percomis* and *Hepatica nobilis* (protected species according to the Swedish Species Protection Ordinance) are used to locate habitats with favourable conservation status that are included in the [Natura 2000 network](#). Natura 2000 is a network within the EU, established in order to ensure the long-term survival of Europe's most valuable and threatened species and habitats, listed under both the Birds Directive and the Habitats Directive, such as Western Taiga (9010) and Fennoscandian herb-rich forests with *Picea abies* (9050).

EU court case: Favourable conservation status of protected species must not deteriorate

A judgement of the European Court of Justice ([joined cases C473-19 and C474-19 Skydda Skogen/Sweden](#)) in March 2021 concerns the interpretation and application of the EU Birds Directive (2009/147) and the Habitats Directive (92/43). Among several things, the Court states that EU Member States are obliged to ensure that the favourable conservation status of protected species should not be subject to deterioration.

The EU Timber Regulation

The [EU Timber Regulation](#) prohibits illegally harvested timber from being placed on the EU market, and sets out preconditions for the marketing of timber and timber products in the EU. Only timber products which have been produced in accordance with applicable legislation, including national legislation, of the timber-producing country are allowed to enter the EU.

Conservation of valuable forest biological core areas prioritised

According to the [Strategy for Formal Protection of Forests in Stockholm County](#), conservation measures regarding existing forest biological core areas should be prioritised. Preserving core areas is considerably more effective than harvesting them. Restoring valuable areas is much more costly, time-consuming and uncertain. With the content of structures such as old trees and coarse dead wood, most types of forest core areas take a long time to form. It is also highly unlikely that new core areas can be recreated with current quality and species content within a reasonable time to ensure the survival of many specialised species. According to the Strategy, an overall aim is to protect unprotected core areas from harvest.

Overall, it is important to preserve remaining natural forests for the future so that national and international environmental objectives for forests can be achieved.

Formal protection of the now logged calcareous coniferous forest in Vamby was of both national and international interest and necessary to preserve an internationally prioritised forest type and threatened species for which Sweden has a global conservation responsibility. Both the Swedish Forest Agency and the County Administrative Board acted deeply incorrectly in this case, as the logging is in breach of the Swedish Environmental Code, the Swedish Species Protection Ordinance and the EU Habitats Directive. This serious mistake must not be repeated. The Swedish Government, Parliament, the Swedish Forest Agency and the County Administrative Board have a duty to ensure that national and international environmental objectives are met.

Stop the planned felling of the calcareous coniferous forest in Garphytteklint in Örebro municipality.

We cannot afford to lose any more valuable natural forests in Sweden.

With sad regards,

Ida Sellstedt, Spokesperson, Protect the Forest Sweden

Lina Burnelius, Project Leader and International Coordinator, Protect the Forest Sweden

Ola Nordstrand, Chairperson, Swedish Society for Nature Conservation in Roslagen

Silke Frank, Chairperson, Swedish Society for Nature Conservation in Örebro County

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Species list from the calcareous coniferous forest which is planned to be felled in Garphytteklint, Örebro County (including species near-by that will be affected by the felling)

Ulmus glabra (CR)

Fraxinus excelsior (EN)

Hydnellum mirabile (EN) - Globally red-listed by the IUCN.

Cortinarius cumatilis (VU) - Typical species for 9050 Fennoscandian herb-rich forests with *Picea abies*.

Gomphus clavatus (VU) - included in national action plan for protection of *Gomphus clavatus*. Sweden has an international responsibility to protect this species.

Goodyera repens (VU) - protected by 8 § Swedish Species Protection Ordinance.

Hydnellum glaucopus (VU) - included in national action plan for protection of red-listed Sarcodon.

Hydnellum lundellii (VU) - included in national action plan for protection of red-listed Sarcodon; very rare and endangered species globally.

Ramaria karstenii (VU)

Ramaria safraniolens (VU)

Tricholoma atosquamosum (VU)

Callidium aeneum (NT)

Clavariadelphus truncatus (NT)

Cortinarius harcynicus (NT)

Curruca curruca (NT) - protected by 4 § Swedish Species Protection Ordinance.

Dryocopus martius (NT) - protected by 4 § Swedish Species Protection Ordinance, Annex 1 of EU Birds Directive

Eptesicus nilssonii (NT) - protected by 4 § and 5 § Swedish Species Protection Ordinance, Annex 4 of the EU Habitats Directive

Ficedula hypoleuca (NT) - protected by 4 § Swedish Species Protection Ordinance.

Hertelidea botryosa (NT)

Hydnellum geogenium (NT) - Typical species for 9050 Fennoscandian herb-rich forests with *Picea abies*.

Hydnellum suaveolens (NT) - Typical species for 9050 Fennoscandian herb-rich forests with *Picea abies*.

Hygrocybe punicea (NT)

Microcalicium ahlneri (NT)

Myotis nattereri (NT) - protected by 4 § and 5 § Swedish Species Protection Ordinance, Annex 4 of the EU Habitats Directive

Phellinidium ferrugineofuscum (NT)

Phellodon niger (NT)

Phylloscopus sibilatrix (NT) - protected by 4 § Swedish Species Protection Ordinance.

Picoides tridactylus (NT) - protected by 4 § Swedish Species Protection Ordinance, Annex 1 of EU Birds Directive

Poecile montanus (NT) - protected by 4 § Swedish Species Protection Ordinance.

Poecile palustris (NT) - protected by 4 § Swedish Species Protection Ordinance.

Porodaedalea pini (NT)

Ramaria testaceoflava (NT)

Sarcodon squamosus (NT) - Typical species for 9010 Western Taiga.

Turdus iliacus (NT) - protected by 4 § Swedish Species Protection Ordinance.

Turdus pilaris (NT) - protected by 4 § Swedish Species Protection Ordinance.

Species list from the logged calcareous coniferous forest in Vamby, Norrtälje municipality:

Hydnellum mirabile (EN) – demanding and rare species only found in forests with long continuity. A large concentration of Sweden's known sites is found in the eastern parts of county Uppland. Globally red-listed by the IUCN.

Hydnellum fennicum (VU) - included in national action plan for protection of red-listed Sarcodon; one of the most demanding tooth fungi in Sweden. Sweden has an international responsibility to protect *Hydnellum fennicum*.

Ramaria sanguinea (VU) – demanding species in continuity calcareous forests; a large concentration of Sweden's findings of this species is found in eastern Uppland.

Boletopsis leucomelaena (VU) - Typical species for 9050 Fennoscandian herb-rich forests with *Picea abies*, demanding species in old calcareous forests.

Hydnellum lundellii (VU) - included in national action plan for protection of red-listed Sarcodon; Norrtälje municipality has a special responsibility to protect this species; very rare and endangered species globally.

Ramaria safraniolens (VU) – characteristic species of old calcareous forests in Uppland.

Gomphus clavatus (VU) - included in national action plan for protection of *Gomphus clavatus*, only found in forests with long continuity and lime content; a large concentration of Sweden's findings of this species is found in eastern Uppland. Sweden has an international responsibility to protect this species.

Ramaria pallida (NT) – demanding species in calcareous forests; the findings of this species today are remnants of previous larger interconnected population distribution. Strong decline of the species in the rest of Europe.

Cortinarius russeoides (NT) – found in calcareous coniferous forests.

Hydnellum aurantiacum (NT) - Typical species for 9010 Western Taiga; the largest concentration of mycelia we know of was found in this forest.

Cortinarius sulfurinus (NT) - found in calcareous coniferous forests.

Phellodon niger (NT) - Typical species for 9050 Fennoscandian herb-rich forests with *Picea abies*.

Phellinidium ferrugineofuscum (NT) - Typical species for 9010 Western Taiga, 9050 Fennoscandian herb-rich forests with *Picea abies* and 9030 Natural forests of primary succession stages of landupheaval coast.

Cortinarius meinhardii (NT) - Norrtälje municipality has a special protection responsibility for this species; large concentrations of Sweden's findings are found in this municipality.

Cortinarius odorifer (indicator species) – found in calcareous coniferous forests.

Sarcodon imbricatus s.str. (indicator species)

Microbregma emarginatum (indicator species)

Pyrola chlorantha (indicator species) - Typical species for 9010 Western Taiga and 9060 Coniferous forests on, or connected to, glaciofluvial eskers

Ramaria sp. (indicator species) – several *Ramaria* species are found in the forest.

Cortinarius percomis (indicator species) - Typical species for 9050 Fennoscandian herb-rich forests with *Picea abies*; found in calcareous coniferous forests.

Cortinarius venetus (indicator species) – found in calcareous coniferous forests.

Craterellus lutescens (indicator species)

Hydnellum peckii (indicator species)

Cortinarius glaucopus (indicator species)

Hydnellum conrescens (indicator species)

Common hepatica (*Hepatica nobilis*) - protected by 9 § Swedish Species Protection Ordinance

Goldcrest (*Regulus regulus*) - protected by 4 § Swedish Species Protection Ordinance

European crested tit (*Lophophanes cristatus*) - protected by 4 § Swedish Species Protection Ordinance; Typical species for 9010 Western Taiga