

Ms. Åsa Romson
Minister for Climate and the Environment
Government of Sweden
Miljö- och energidepartementet
103 33 Stockholm
Sweden

Dear Ms. Romson,

We, the representatives of organizations which are mostly members of the Environmental Paper Network (EPN), want to express our deep concern regarding Swedish forestry practice. Sweden is one of Europe's largest producers of pulp and paper, and the Swedish forest industry is an important provider of paper, paper board and sawn and planed products for many countries. However, we have learned that the current Swedish forest policy and legislation allows the forest industry to use methods that have a huge impact on forest biodiversity and ecosystem services. The use of clear-cut logging as the default method, even with some improvement in recent years through more consideration for nature, has led to a severe situation for hundreds of forest species. More than 850 forest species are considered threatened.¹ Also, the clear cuts and plantation like forestry has a negative impact on reindeer herding by indigenous Sami people, as well as on many local communities. Forestry in Sweden cannot therefore be regarded as sustainable: neither from an ecological, nor from a social point of view.

Forests and forestry also play an important part in the global climate. Globally, forests are an important carbon store and sink: trees and plants as well as the forest soil. Forestry nevertheless exacerbates climate change since many of the products from the forest industry are, from a life-cycle perspective, contributing large emissions of greenhouse gases (GHG).

A major part of the annual forest felling in Sweden² is turned into paper and paperboard, which are products typically with a short lifespan but with a severe climate impact. When paper is not recycled it is often burned or deposited in landfills. In either case, greenhouse gas emission will occur – if paper is degraded in landfills it will produce methane, a greenhouse gas approximately 25 times more powerful than carbon dioxide. Recent studies suggest that the pulp and paper industry on a life cycle basis might contribute as much as 7.5 % of the global emissions of human induced greenhouse gases.³

Some of the last larger European wilderness areas, located in Sweden and still not legally protected, are threatened or already affected by destructive logging practices, such as clear-cutting on sites that should not have been used by forestry in the first place. This is a concern not only from a Swedish point of view. The environmental awareness of

¹ Categories VU, EN or CR in the Red List. More at The Swedish Species Information Centre <http://www.slu.se/en/collaborative-centres-and-projects/artdatabanken/>

² Approximately 65 % of the annual felled volume is used by the paper and pulp industry, according to statistics from Swedish Forest Industries Federation 2014.

³ <http://www.environmentalpaper.eu/climate-change/> (EPPN 2013)

people and organizations within and outside Europe is relatively high, and there is often international attention on Swedish forest management.⁴ In several countries Sweden is regarded as a popular travel destination. We understand that the tourism industry in Sweden is about the same size, financially, as the whole forestry sector. Therefore it is very important that the paper and wood products that consumers buy come from sustainable forestry that does not endanger forest ecosystem values.

Further, we gather that the government is, through existing legislation, authorizing clear cutting in old growth forests/woodland key habitats, despite the documented existence of a whole range of red listed and threatened species.⁵ None of this meets reasonable expectations of sustainable forestry. The fact that clear cutting represents the standard method of tree harvesting in Sweden is not in line with our understanding of sustainable forest management.

We have learned this, and more, from publications by Swedish environmental and nature conservation organizations which document the destruction of pristine forest areas and habitats for endangered species worthy of protection, even by certified forest owners. And we have registered the great and growing disappointment of Swedish environmental organizations about the lack of effectiveness in certification systems and of the insufficiency of national regulation of forest management.⁶

Understanding the urgent need for change, we propose the following action points:

- Immediately protect all woodland key habitats and old growth forests.⁷
- Strengthen the forestry legislation, with effective sanctions for destructive logging.

We are convinced that more effective regulations for protecting forest biodiversity and improvement of the role of forests for climate change mitigation are desperately needed within the forestry sector of Sweden. We therefore call upon you to more tightly regulate management practices in Sweden's forests so that the protection of your country's biodiversity and ecosystem values is guaranteed in the future. We understand that the government is preparing for a revision of the forestry legislation. We find this promising, and cannot enough stress the need for stricter and clear regulations that will secure all the ecosystem services of the Swedish forests, where raw material is just one.

Yours sincerely,

Mandy Haggith, European Environmental Paper Network
Wen Bo, China Environmental Paper Network
Peg Putt, Markets for Change, Australia
Noel Plumb, Chip Busters, Australia
Jill Redwood, Australian Forest and Climate Alliance, Australia
Susie Russell, North Coast Conservation Alliance, Australia
Bronte Somerset, South East Region Conservation Alliance, Australia
Linde Zuidema, Fern, Belgium/UK
Maryjka Mychajlowycz, Friends of Clayoquot Sound, Canada

⁴ E.g.:

http://www.theecologist.org/News/news_analysis/2749552/swedish_wildlife_extinction_threat_as_loggers_clearcut_old_growth_forests.html and <http://voices.nationalgeographic.com/2011/12/28/a-green-veneer-sweden%E2%80%99s-forestry-industry-gets-low-marks-despite-reputation/>

⁵ E.g. "Under the Cover of the Swedish Forestry Model" (Swedish Society for Nature Conservation, 2011)

⁶ E.g. "Credibility at Stake - How FSC Sweden Fails to Safeguard Forest Biodiversity (Swedish Society for Nature Conservation, 2013)

⁷ Forest that has never been clear-cut and thus has an unbroken continuity

Jens Wieting, Sierra Club British Columbia, Canada
Virpi Sahi, Finnish Association for Nature Conservation, Finland
Matti Liimatainen, Greenpeace Nordic, Finland
Lauri Kajander, Luonto-Liitto/the Finnish Nature League, Finland
Peter Gerhardt, denkausbremen, Germany
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Klaus Schenk and Reinhard Behrend, Rainforest Rescue (Rettet den Regenwald e.V.), Germany
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Andrei Laletin, Friends of the Siberian Forests, Russia and Social Ecological Union - Friends of the Earth, Russia
Juraj Lukac, WOLF Forest Protection Movement, Slovakia
Philip Owen, GeaSphere, South Africa
Wally Menne, Timberwatch Coalition, South Africa
Lukas Straumann, Bruno Manser Fund, Switzerland
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Andrew Goldberg, Dogwood Alliance, USA
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Todd Paglia, Forest Ethics, USA
Neil Seldman, Institute for Local Self-Reliance, USA
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Tim Keating, Rainforest Relief, USA
Dolores Bruten, Reach for Unbleached, USA
Eric Benson, Re-nourish, USA
Matt Daggett, Greenpeace International