



Monday, 07 December 2009

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COMPLAINT AGAINST OPERATIONS OF SCA SKOG, CERTIFICATE NUMBER SGS-FM/COC-0213

Dear Mr Sahlin

This letter serves as response to your complaints against the harvesting operations of SCA Skog and their compliance with the FSC standard for forest management. Our first confirmation of receipt dated 16 September 2009 and subsequent correspondence and meeting with our lead auditor from SGS Sweden AB on October 22 has reference.

We have received five different formal complaints from you which have reference to one harvesting site each: "Lill-klumpvattnet", "Blåbärstjärn", "Vattensjöberget" "Lill-Gravberget", and "Fasikan" registered on October 06/07 and November 06.

All together the complaints concern four different standard requirements: **6.1.1** (Protection of Forest Key habitats), **6.5.5** (Protection of "Trees with high biodiversity value", **6.5.7** (Protection of dead wood), **6.7.5** (Consideration to the living conditions of red-listed species).

As these complaints were raised during a limited time period SGS Qualifor, investigated them altogether as part of the annual surveillance audit and thus regarded them as one complaint based upon five different sites.

Our investigation, which includes field visits at "Blåbärstjärn", "Lill-klumpvattnet" and "Lill-Gravberget" reveals that many of your viewpoint were justified and that SCA therefore need to take actions to further improve their performance. As the last complaint regarding harvesting at "Fasikan" does not seem to include any additional aspects of interest compared to the other sites, there is no need for SGS to collect further objective evidence through a field visit to "Fasikan".

Based on evidence gathered during the investigation four minor "CARs" (Corrective Action Requests) and three "Observations" were raised. Observations were raised to address issues where SCA Skog had agreed with you and already had initiated corrective actions or where the auditor want to address areas of concern where non-conformances not have been established through objective evidence. These Observations will be further looked upon during the next surveillance audit.



As you may well know, SCA Skog was granted re-certification following last year's audit. In October 2009 they had their first surveillance audit during their third certification period. In accordance with our procedures for FSC-certification, CARs raised during the previous certification period does not affect the result. However, I am informed that SCA Skog has taken long term actions to further improve their performance during planning and harvesting and that the course of action will be closely monitored by our lead auditor at SGS Sweden.

Attached you find the CARs and Observations that were raised in connection to the investigation of your complaints.

I trust you find this in order.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Gerrit Marais'. The signature is fluid and cursive, with a large initial 'G' and a small dot above the 'i'.

Gerrit Marais

Director: SGS Qualifor

Cc Andreas Renofalt: SGS Sweden

CARs and Observations as results of Complaints from SSNC, 2009.

CARs

1. Minor, Clause 4.3 “Forest management ...is not carried on... with consideration ...to other interests.” ”Skogsbruket bedrivs inte... med hänsyn till... andra intressen.”

Evidence: The internal complaint resolution procedure is not fully satisfactory. Stakeholders has not received acknowledgement on their complaints within a reasonable time frame and in some cases they have not received information about the final outcome of the process.

Hanteringen av externa klagomål fungerar inte tillfredställande. Intressenter har inte fått mottagningsbekräftelse på sina klagomål inom rimlig tid och för vissa hanterade klagomål har inte intressenter meddelats det slutliga beslutet.

2. Minor, Clause 4.1.2 “The enterprise does not only employ employees who have the required competence.” “Företaget anlitar inte endast arbetstagare som har erforderlig kompetens”

Evidence: All key positions does not have documented specified qualification requirements regarding education, training and experience. There are examples when seasonally employed personnel has not received sufficient training and guidance. The internal follow-up of the harvesting at Blåbärstjärn did not identify the occurring non-conformances.

Alla nyckelbefattningar har inte specificerade kvalifikationskrav vad gäller utbildning, övning, erfarenhet. Exempel finns där tillfälligt anställd personal inte fått den internutbildning och handledning som krävs för arbetsuppgiften. Vid uppföljning av Blåbärstjärn noterades inte de avvikelser som finns.

3. Minor, Clause 6.1.1 ”Forest Key habitats has not been exempted from measures other than the management required to preserve and support the natural biological diversity of the habitat.”

“Nyckelbiotoper har inte undantagits andra åtgärder än vad som är påkallat för att bevara och främja biotopens naturliga biologiska mångfald.”

Evidence: Two examples (which was brought to attention by SSNC in their complaints regarding harvesting sites at Blåbärstjärn and Lill-Klumpvattnet) where forest key habitats has been harvested have been noted. In the case of Blåbärstjärn SCA concurred with the complainant and had therefore already initiated corrective actions. In the case of Lill-Klumpvattnet SCA and SSNC had diverging opinions. The local specialist from the Forestry Board assessed the area and concluded that forest key habitat had been harvested. Since SCA has made an incorrect judgement in this case there is a need for corrective actions.

Två exempel (som lyfts fram av SNF i sina klagomål gällande Blåbärstjärn och Lill-Klumpvattnet) på att skog med nyckelbiotopskvaliteter har blivit avverkat har konstaterats. I fallet med Blåbärstjärn håller SCA med om att så har skett och därför redan initierat ett åtgärdsprogram. I fallet med Lill-Klumpvattnet hade SNF och SCA olika uppfattningar. Skogsstyrelsens lokala specialist har dock bedömt att skog med nyckelbiotopskvalitet har avverkat på Lill-Klumpvattnet vilket gör att SCA i detta fall har gjort en felaktig bedömning och därför behöver vidta korrigerande åtgärder.

4. Minor, Clause 6.1.2 “During selection and demarcation areas (for conservation) has not been prioritized according to their importance for biodiversity and representativity in the landscape.” “Vid urval och avgränsning prioriteras inte områden (för skydd mot avverkning) efter deras betydelse för den biologiska mångfalden och representativitet i landskapet.”

Evidence: One example (which was brought to attention by SSNC in their complaints regarding the harvesting sites at Lill-gravberget) of where forest with high conservation value has been harvested has been noted. Although the Forestry Board had concluded, prior to harvesting, that the forest did not include any key habitats did the forest include such conservation attributes that it, according to SCA’s own procedures, should have been prioritized as a set aside area in the local ecological landscape plan.

Ett exempel (som lyfts fram av SNF i sitt klagomål på trakten Lill-gravberget) på att skog med högt bevarandevärde har blivit avverkad har konstaterats. Även om det innan avverkning är konstaterat av Skogsstyrelsen att skogen på Lill-gravberget inte höll nyckelbiotopskvalitet fanns dock så höga naturvärden att skogen borde, enligt SCAs interna rutiner, ha prioriterats för skydd i den ekologiska landskapsplanen.

Observations

1. Clause 6.5.5: Nature value trees has not always been protected from harvesting. Naturvärdesträd har inte alltid värnats vid slutavverkning

Two examples (which was brought to attention by SSNC in their complaints regarding the harvesting sites at Blåbärstjärn and Vattensjöberget) of where pine and spruce trees with fire scars has been cut was noted. SCA agrees with SSNC and has initiated corrective actions.

Two examples (which was brought to attention by SNF in their complaints regarding the harvesting sites at Blåbärstjärn and Vattensjöberget) of where pine and spruce trees with fire scars has been cut was noted. SCA agrees with SNF and has initiated corrective actions.

2. Clause 6.5.7: Dead wood has not been protected. Död ved har inte värnats.

a) Two examples, which was brought to attention by SSNC in their complaints regarding the harvesting sites at Blåbärstjärn and Lill-klumpvattnet, where dead wood, such as standing dead trees and decaying tree trunks on the ground not have been protected. SCA agrees with SSNC and has initiated corrective actions. (Yet two more sites where SCA and SSNC have different opinions have been visited by SGS and a specialist from the Forestry Board. On these sites no non-conformances were noted against this requirement)

Two examples, which was brought to attention by SNF in their complaints regarding the harvesting sites at Blåbärstjärn and Lill-klumpvattnet, where dead wood, such as standing dead trees and decaying tree trunks on the ground not have been protected. SCA agrees with SNF and has initiated corrective actions. (Yet two more sites where SCA and SNF have different opinions have been visited by SGS and a specialist from the Forestry Board. On these sites no non-conformances were noted against this requirement)

b) The procedures for planning of final harvesting does not take into account whether the site will be harvested with a snow cover or not. The need for demarcation of decaying logs is higher during snowy harvesting conditions.

Vid planering beaktas inte om snötäcke ökar risken för bristande detaljhänsyn. Behovet av markering av värdefulla lågor är högre vid avverkning med snötäcke.

3. Clause 6.7.5: Consideration to red listed species. Hänsyn till rödlistade arter.

The planning instruction regarding consideration to occurrences of red listed species can be more specific. For instance should red listed species in high threat categories be given more consideration to single occurrences. The fact sheets provided by the Swedish Species Information Centre should be used as guidelines. In some cases national experts should be contacted for advice when deciding on proper consideration.

Instruktionen till planerarna om vilken typ av hänsyn som krävs för olika arter kan bli tydligare. T.ex. bör rödlistade arter i de högre hotkategorierna särskilt beaktas med specifik hänsyn till varje enskild förekomst. Artdatabankens artfaktblad bör vara vägledande. I vissa fall bör nationella experter rådfrågas vid utformningen av hänsynen.