



Stockholm
15 januari 2018

Distinguished Members of the European Parliament

I am writing with reference to the letter from the Swedish and Finnish ministers Ibrahim Baylan and Kimmo Tiilikainen on Energy (dated 10 of Jan) in order to comment on positions stated in this letter.

The Swedish Society for Nature Conservation (SSNC) recognizes the great importance of bioenergy as a vital and obvious component in every present and future energy system. All nations must do their outmost in order to be able to fulfil the Paris commitment. However, it is very important that any renewable energy, contributing to the energy system, is produced in a way that is really and truly sustainable and that does not compromise with other ecosystem services or impact biodiversity negatively. When applying the crucial concept sustainability it is vital that all aspects and dimensions that this concept encompasses are included. *Biodiversity* is such an aspect of sustainability that must be taken into serious consideration when assessments are made and decisions are taken. Just to mention one of several aspects of sustainability besides climate/green house gases.

We fully agree with the statement in the letter: “.....for us a sustainable forest management is a necessity for both environmental and economic reasons”. We have for many years been striving for sustainable forestry in Sweden. One of several prerequisites for sustainable forestry is that biodiversity is preserved over time. This is currently not the case in Sweden, Finland, nor in the EU.

In the letter, the two ministers state (p. 3) that “The risk based approach assesses the sustainability of forest based bioenergy via the comprehensive systems that are already in place to ensure sustainable forest management in countries or regions”. *This is not correct.* Sustainable forestry is not in place, nor ensured, in Sweden or Finland; nor in the EU as a whole, today.

The Swedish Government provided a rather clear and to the point description of the situation in its bill to the national Parliament (on the State budget) this autumn (bill no. 2017/18:1), under the headline of the environmental quality objectives regarding forests and biodiversity respectively. These objectives were adopted by Parliament already 1999 and 2005. The Government concludes that, for example:



- Many forest living species are adversely affected by the forestry, and the loss of biodiversity has not slowed down.
- Sensitive biotopes and watercourses are damaged to a great extent by forestry. Approximately 2000 new watercourses are heavily damaged each year.
- Restoration of forest landscapes need to be developed to benefit more ecosystem services.
- 15 of the 16 forest habitat types covered by the EU Habitats Directive (92/43/EEG) have poor or insufficient conservation status in Sweden. In total, 20 out of 32 reported forest living species have poor or insufficient conservation status. Most of today's managed forests lack most of the qualities that apply to the EU's Habitats Directive.
- A majority of the 1812 red listed forest living species suffer from decreasing populations. An important factor is logging of old forests.

The Government's assessment is underpinned by several scientific reports, as well as of the assessment reports launched by the Government's own expert agencies (Swedish EPA and the Swedish Forestry Agency).

The ongoing loss of habitats of forest living species in Sweden is a true and major threat to biodiversity. Forest habitats with suitable qualities for many red listed forest living species are not recreated, nor colonized at the same rate as the natural forests are being clear felled. There is clearly not enough suitable habitats for these species in Sweden's heavily managed forestland.

A large part of the Swedish forests are certified by certification schemes like FSC and PEFC. SSNC has reviewed the forestry's (certified actors) performance on the ground in accordance with the FSC certifications for more than 10 years and has concluded that the certification system does not work as intended in Sweden. Despite being certified these old growth forests providing habitats for threatened species are being clear felled systematically.

We are truly concerned about the situation of the current forest biodiversity in the Swedish forests and therefore urge you to consider, at the forthcoming voting in Parliament on the RED II Directive:

- The final formulation of the RED II Directive must seriously take biodiversity and other aspects of sustainability into consideration. The present situation regarding forest depending biodiversity is in many ways acute. This goes for Sweden and Finland, as well as for EU as a whole.



- Common EU criteria on sustainability must therefore incorporate biodiversity as an important aspect, in line with the objectives and targets laid down in the *EU biodiversity strategy to 2020 - Our life insurance, our natural capital* (2011), as well as the objectives of the Habitats Directive (to reach conservation of biodiversity through favourable conservation status for species and habitats).

I hope that this letter has brought to your attention that forestry in Sweden is *not* sustainable today. Action is needed in order to safeguard real sustainability in the future endeavours.

Yours sincerely

Karin Lexén,
Secretary General