



CASESTUDY01

Finland

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#01



FSC AT RISK

**FINLAND: HOW FSC CONTROLLED
WOOD CERTIFICATION IS THREATENING
FINLAND'S HIGH CONSERVATION VALUE
FORESTS AND ITS SPECIES AT RISK**

GREENPEACE

Established nearly 20 years ago, the Forest Stewardship Council (FSC) is widely recognised as the highest global certification standard for forest management. Nonetheless, with the FSC's rapid growth, there is growing concern with the increasing number of certificates being awarded to controversial forest management operations that do not meet the standards of the system.

To keep FSC certification as a credible tool to help protect forests, Greenpeace International is publishing a series of case studies exposing controversial operations that are posing the greatest risk to the FSC's integrity. We will also be highlighting best practice operations that are meeting and/or exceeding the FSC's principles and criteria. These case studies will show the standards that must be consistently met if the FSC is to maintain its credibility.

Increasingly, the poor performance of some companies holding FSC certificates is beginning to overshadow the cases where the FSC has led to a substantial improvement from status quo logging practices and supported the increased on-the-ground protection of forests. These "bad apple" FSC-certified operations present a reputational liability to the FSC brand, and will likely undermine consumer trust of the label.

The FSC needs to be strict with these "bad apple" operations by removing them from the system until they sufficiently reform their practices to meet FSC standards. FSC must also strengthen the certification process to prevent any more certificates from being awarded to operations that fail to meet the standards. Furthermore, the FSC needs to apply its world-leading criteria consistently in order to maintain the integrity of the FSC brand. Members of the FSC's economic, social and environmental chambers have worked hard for two decades to maintain the value of the FSC as a validator of responsible forest management, and as a tool for the marketing of responsible forest products. As a result, both the system and the availability of FSC-certified products have grown by leaps and bounds.

Now FSC supporters need to work together to keep the FSC strong as it continues to grow.



image: Logging by the Finnish state forestry enterprise Metsähallitus, in state-owned old-growth forest, is destroying the habitat of the red-listed flying squirrel.
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OTHER CERTIFICATION SYSTEMS

Greenpeace does not believe that other forest certification systems, such as PEFC (The Programme for the Endorsement of Forest Certification), SFI (Sustainable Forestry Initiative) and MTCS (Malaysian Timber Certification Scheme), can ensure responsible forest management. While the FSC faces challenges, we believe that it contains a framework, as well as principles and criteria, that can guarantee socially and ecologically responsible practices if implemented correctly. The other systems lack robust requirements to protect social and ecological values.



image: Logging by the Finnish state forestry enterprise Metsähallitus, in state-owned old-growth forest, is destroying the habitat of the red-listed flying squirrel.
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CONTROLLED WOOD IS OUT OF CONTROL

The FSC's controlled wood classification (CW) was introduced to allow more FSC material mixed with non-certified material to be labelled, and to provide an intermediate step to move its wood suppliers or its own forests to full FSC forest management certification. However, many companies are just using controlled wood as a permanent solution to having their products labelled as FSC.

The majority of the FSC's controlled wood supply is screened by companies through risk assessments to avoid controversial wood from "uncontrolled" sources, such as illegal logging, conversion of forests to plantations or non-forest uses, high conservation value (HCV) forests, social conflict areas, and genetically modified organisms (GMOs). Currently, there is little consistency in, or accountability for, how companies conduct their own risk assessments. This results in weak risk assessments without sufficient proof of low risk, but with a high potential for controversial wood to enter the FSC system.

FINNISH FORESTRY SECTOR ABUSE OF CONTROLLED WOOD THREATENS THE FSC BRAND

This case study describes how FSC chain-of-custody (CoC) certificates – held by Finland's three largest pulp and paper producers UPM, Stora Enso and Metsä Group – do not comply with FSC's CoC standard for sourcing controlled wood, and therefore present a liability to the FSC reputation and brand.¹ These companies are sourcing "controlled wood" in contravention of requirements for the maintenance of high conservation values.

UPM, Stora Enso and Metsä Group have all held FSC CoC certificates to produce FSC mixed products and, since 2006/7, have been purchasing controlled wood from different suppliers in Finland, as well as from Russia and the Baltic states.

	UPM ²	STORA ENSO ³	METSÄ GROUP ⁴
Case Study FSC certificates #	SGSCH-COC-002249 SGSCH-COC-002238	DNV-COC-000287 DNV-COC-000020 DNV-COC-000157	SQS-COC-100746 SQS-COC-100488 BV-COC-897631
FSC licence codes	FSC-C014719 FSC-C011143	FSC-C092800 FSC-C015932 FSC-C003140	FSC-C002102 FSC-C081807 FSC-C014476
Certifying body	SGS Qualifor (SGS)	Det Norske Veritas Certification AB (DNV)	Swiss Association for Quality and Management Systems (SQS), Bureau Veritas Certification (BV)
Countries of operation	Worldwide	More than 35 countries worldwide	Finland, Baltic countries, Sweden, Russia, other
Total FSC forest management (FM) area certified	563,628	912,126 (in 2012)	305,910 (2012)
Controlled wood (CW) district of origin identified in company risk assessment	Central and southern Finland, Kainuu	Lists the 12 regions of Finland including Kainuu	Finland
Number of FSC chain-of- custody (CoC) facilities/ certificates	120 (including sites/group members)	80 (including sites/group members)	54 (including sites/group members)
FSC products: Pulp, paper, lumber	Pulp, paper, plywood, timber	Paper (fine and board), pack- aging and building materials	Wood chips, paper (fine and board), timber
Markets for FSC products	Global	Global	Global
FSC complaint(s) on CW sourcing or certificates by stakeholders	<p style="text-align: center;">_____ Concerns expressed directly to the companies _____ (the first step to activate a formal FSC complaint process)</p>		
FSC corrective action requests filed	No	No	No
Public availability of permits and forest management plans from CW supplier(s)	<p style="text-align: center;">_____ Not required by FSC _____</p>		
Public availability of detailed maps of the lands from CW supplier(s)	<p style="text-align: center;">_____ Not required by FSC _____</p>		

HCVS AND PROTECTED HABITATS AT RISK

UPM, Stora Enso and Metsä Group have always considered Finland to be low risk for supplying FSC controlled wood for all FSC CW categories.⁵ However, in 2007, the FSC in Finland stated that: "...Finland belongs for the time being in its entirety to the 'unspecified risk' category" [for controlled wood categories 2 (social issues) and 3 (HCVs)].⁶ In reality, the system of Finnish protected areas south of Lapland is not sufficient to ensure the survival of HCVs. The latest assessments of red-listed species (2010) confirm that forestry is the single biggest threat to species biodiversity in Finland, and the majority of Finland's red-listed species are forest species.⁷ The recent assessment of threatened habitat types in Finland (2008) concluded that two thirds of forest habitat types in Finland are threatened, and that the most significant reasons for this were forestry and drainage for forestry (ditching).⁸

The Finnish "Forest Act" is considered the most important regulatory tool for preserving biodiversity in managed forests. However, research conducted in 2006-2007 showed that in practice the Forest Act was already failing to preserve the conservation values of the habitats it was intended to protect.⁹ A new version of the Forest Act was drafted in early 2013 for approval in the summer. But, according to leading scientists and researchers who have reviewed the proposed draft, the new Forest Act is even worse.¹⁰ Therefore, Greenpeace and other major Finnish NGOs consider that there is, and will continue to be, high or unspecified risk related to threatening HCVs and legality for most parts of Finland. HCV compliance cannot be considered as low risk for sourcing FSC controlled wood.

UNDER THREAT

HIGH CONSERVATION
VALUE FORESTS
RARE, THREATENED,
AND ENDANGERED
SPECIES

FROM

UPM, STORA ENSO, THE
METSÄ GROUP AND FIN-
LAND'S GOVERNMENT

CONTROLLED WOOD PURCHASES — BUSINESS AS USUAL

For as long as the FSC has existed, Finland's environmental NGOs have been publishing maps detailing the locations of Finland's HCV forests to highlight the threats they face and the need for their protection. These maps have either been published on the web or sent directly to forestry sector companies. Despite this, UPM, Stora Enso, Metsä Group and their certification bodies (CBs) have ignored the scientific evidence and, in doing so, have failed to accurately assess the risk of their CW supply threatening HCVs at the eco-regional level.

FINNISH STATE IS SYSTEMATICALLY LOGGING IN OLD-GROWTH FORESTS AND IN HABITATS OF IUCN RED-LISTED SPECIES

In the region of Kainuu in eastern Finland, the state forestry enterprise Metsähallitus, one of the main suppliers of Finnish wood, is systematically logging the last fragments of old-growth forests outside of protected areas. The most common method of logging in these forests is clear-cutting. Old-growth forests in this region are valuable on a national scale for many reasons. They are critically important remnant old-growth forest habitats for regionally dwelling IUCN red-listed species, and they act as stepping stones and ecological corridors to red-listed old-growth forest species from large intact old-growth forests in Russia as well as across the rest of Finland.

According to Metsähallitus' own "Ecological Landscape Plans" for this region for 1998-2000,¹¹ habitats of old-growth forest species continue to decline under critical thresholds in the region as a result of logging and fragmentation.

The three cases below show how logging operations in the eastern Finland region threaten HCVs, and may not comply with the Finnish Nature Conservation Act, and how wood from these operations can enter the FSC system as controlled wood.

#1 FINLAND BREAKS ITS OWN LAW BY LOGGING PROTECTED FLYING SQUIRREL HABITATS IN KAINUU REGION

image: Logging by Finnish state forestry enterprise, Metsähallitus, in state-owned old-growth forest, is destroying the habitat of the red-listed flying squirrel. Spring 2013.
© Greenpeace



The northern part of Kainuu region has a high density of Siberian flying squirrel (*Pteromys volans*: a red-listed IUCN species)¹² in old-growth forest habitats. According to the Finnish Nature Conservation Act, flying squirrel habitats are prohibited from being destroyed or degraded. In 2012/13, Greenpeace assessed Metsähallitus' 2012-2013 logging plans for this region and found many of its harvesting plans were in flying squirrel habitats. Recent statements by regional environmental authorities confirm that several flying squirrel habitats have been logged in the region by Metsähallitus, and more logging is planned in many additional flying squirrel habitat areas.¹³

“[A] significant amount of logging has taken place in the known habitats of flying squirrel in the area of Näljänkä, where this planned logging site is located. Some of the areas have been logged to an extent where even whole habitats might have been destroyed ...”

– The Centre for Economic Development, Transport and the Environment of Kainuu, 28 January 2013, in a statement on Metsähallitus' logging plans in Kolkonjoki forest area.

According to our analyses, it is clear that wood from these logging operations has entered, and will likely continue to enter, the FSC CW supply chains of Finnish pulp and paper producers. This is because in all of Metsähallitus' logging operations, the majority of wood is used for pulp and paper production, and the only buyers of pulpwood from this region are UPM, Stora Enso and Metsä Group.

Current planned logging will also degrade ecological corridors between protected areas. In many of the cases, boundaries of clear-cuts are marked next to protected Natura 2000 sites – the EU-wide network of nature protection areas¹⁴ – without any buffer zones. Forests in many of the cases are also known to host other red-listed species, mainly fungi.¹⁵

“...the amount of habitats for old-growth forest species will decrease in the future under critical thresholds... habitats of old-growth forest species will diminish further as a result of fragmentation...”

– Landscape Ecological Plans of Näljänkä and Vepsa, region of Kainuu, Metsähallitus, 2000.

#2 FINNISH STATE COMPANY DESTROYS HCV FORESTS AND WATER BUFFER ZONES IN MALAHVIA

image: Clear-cutting by Finnish state forestry enterprise Metsähallitus in old-growth forests of Malahvia in eastern Finland – defined as an area of national significance for the protection of exceptional ecological values by government research institutes. October 2012. © Greenpeace/Liimatainen



According to numerous research reports by regional environmental authorities, the forest of Malahvia in eastern Finland has national significance for the protection of red-listed old-growth forest-dwelling birds, fungi and insect species, such as the golden eagle (*Aquila chrysaetos*) and Siberian jay (*Perisoreus infaustus*).¹⁶ The area has also been classified as one of the most valuable HCV forests for the protection of small waterway ecosystems in the region of Kainuu.¹⁷ According to governmental research reports, Malahvia is “a forest site of major importance even on a national scale, whose diverse insect fauna and other endangered species will be saved only if no further fragmentation takes place”¹⁸. However, Metsähallitus has ignored this information, and keeps on logging in the area, even in forests that have been defined as ecological corridors in its own “landscape ecological plans”¹⁹. In October 2012, clear-cutting also took place in areas defined as “landscape areas” by Metsähallitus. Moreover, Metsähallitus violated its own environmental guidelines, which forbid logging on the shorelines of small waterways.²⁰

“Metsähallitus promised to observe the environmental principles in the area. The logging practice seems to be something completely different.”

– Mr. Ville Niinistö, Finnish Minister of Environment, on logging in Malahvia, according to newspaper *Helsingin Sanomat*, 21 October 2012.

#3 CRITICAL HCV FOREST CORRIDORS AND ECO-TOURISM SITE LOGGED FOR CW IN YLI-VUOKKI

image: Logging in January 2013, in Yli-Vuokki in Eastern Finland, in an important forest ecological corridor between two larger protected areas. January 2013.
© Greenpeace/Ojutkangas



In January 2013, Metsähallitus logged in an important forest ecological corridor between two larger protected areas and an important recreational forest located in Yli-Vuokki area in eastern Finland. Metsähallitus, in its own special land use report, documented the area as having significance for threatened species, and as an ecological connection between protected areas.²¹ Yet it went ahead with clear-cutting some of the forests in the very same ecological corridors that it had identified in its public plans. It also clear-cut the forests along shorelines of small lakes and ponds in the area, in violation of Metsähallitus' own environmental guidelines, which identify the shoreline forests of small ponds as no-go zones for forestry.

“The cultural landscape is [again] being fragmented by clearcutting. There does not seem to be anyone who could stop this.”

– Mr. Heikki Rytkölä, researcher and former director of Museum of Kainuu, on logging in Yli-Vuokki forest, according to newspaper *Helsingin Sanomat*, 30 January 2013.

“The recreational forest of Yli-Vuokki is one of the most important ecotourism sites in Suomussalmi. The main attractions of the area are e.g. its wilderness character and waterways.”

– Metsähallitus land use plan for Yli-Vuokki, 2010.

COMPANY RESPONSES TO EVIDENCE OF WOOD FROM THREATENED HCVs ENTERING THEIR CW SUPPLY CHAIN

Greenpeace informed Metsähallitus' three largest customers, Stora Enso, UPM and Metsä Group, about the risk of threatened HCVs and illegal wood entering their supply chains. Each of the companies responded differently to Greenpeace's inquiries.²²

Regarding the flying squirrel habitat destruction in northern Suomussalmi, Stora Enso said that – together with its CB – it would investigate the risk of the controversial wood supply, but admitted that it does not have a system in place to exclude HCV wood from controversial sources, as the company has outsourced its risk assessment to Metsähallitus.²³ Regarding the HCV destruction in Malahvia, Stora Enso concluded that buying wood would have been a breach of FSC CW rules, so it refused to buy the wood.²⁴ Stora Enso bought the wood from the Yli-Vuokki forest area because it considered it not to have threatened HCVs forests that contravene FSC's CW standard.²⁵

UPM stated that it was not buying wood from Malahvia or Yli-Vuokki but, even if it was, it did not recognise that these areas of concern had such HCVs that would prevent its wood from being sourced there. It refused to provide any more information on how it verifies risks in practice.²⁶ The low risk assessment for all CW categories for Finland in UPM's FSC company risk assessments, verified by its CB, SGS, are justified by discounting FSC Finland's "unspecified" guidance for HCV and social category for all of Finland, due to it not having been properly consulted and agreed upon. UPM added that it also did not have board consensus or proper justification – the latter being especially ironic, as UPM and SGS do not provide any justification for low risk for the rest of Finland for any of the CW categories.

Finally, Metsä Group replied that it does not see any problems in its wood procurement from these areas.²⁷

CONCLUSION ON UPM, STORA ENSO AND METSÄ GROUP'S "UNCONTROLLED" WOOD SOURCING

Companies like UPM, Stora Enso and Metsä Group are jeopardising the FSC's integrity by allowing "uncontrolled" wood from operations that negatively impact HCV forests to enter the system. The FSC must immediately revoke the FSC trademark licences of UPM, Stora Enso and Metsä Group until they have cleaned up their supply chain so that they are not sourcing from HCV forests.

In addition, the CBs must properly verify risk assessments to ensure that no "high risk" wood from HCV areas is entering the supply chains of UPM, Stora Enso and Metsä Group. SGS, DNV, SQS and BV have all failed to practise adequate due diligence in verifying the information provided by the companies.

KEEPING THE FSC CREDIBLE

While Greenpeace continues to support the FSC, we cannot indefinitely endorse a system that is not globally consistent in its certification of forest management and controlled wood.²³ Along with other FSC members across its chambers, we are working to achieve the following key improvements in FSC operations and procedures so that the environmental and social values of forests are maintained under the FSC seal of approval.

FSC members, certification bodies, stakeholders and consumers must hold FSC accountable to ensure its standards and policies are strengthened, consistently applied and met to ensure that the ecological and social values of forests managed under the FSC seal of approval are maintained.

FSC must:

- 1) Support the conservation of Intact Forest Landscapes (IFLs) and other HCVs via the International Generic Indicators (IGI) process, and provide guidance on HCV identification and on their maintenance and enhancement.
- 2) Establish safeguards for FSC certification in “high risk” regions facing rampant social conflict and human rights violations, including prioritising the development of a robust Policy for Association due diligence approach – which ensures the disclosure of a company’s ownership, including parent, sister and subsidiary companies – and compliance guidance.
- 3) Tighten the controlled wood system by: increasing the scope and rigour of National Risk Assessments (NRAs) and its control measures, requiring field verification in the absence of a NRA, and implement measures for transition to full forest management certification including a phase out of CW by 2018;
- 4) Improve on the ground performance by holding certification bodies (CBs) accountable for meeting the FSC’s standards. Also, increase FSC’s level of transparency by requiring that Accreditation Services International (ASI) and CBs publish all assessment reports, including the location of forest management units, HCVs and protected areas.
- 5) Increase its support for smallholders and community forest managers to achieve FSC certification across the FSC network, including swiftly implementing the Modular Approach Programme standard.

To review the FSC’s progress on Greenpeace’s recommendations, please visit: www.greenpeace.org/international/FSC-at-risk



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image: Old-growth forest in Kainuu, eastern Finland, habitat for the red-listed flying squirrel, has been marked for clear-cutting by Finnish state forestry enterprise, Metsähallitus. © Greenpeace

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