

OPEN LETTER

2019

Ulf Larsson

President and CEO SCA

Sweden

Copenhagen, 26th June

Dear Mr Ulf Larsson,

I am following up on your letter dated the 23rd of April 2019.

As you are probably aware, Greenpeace campaigners continue to engage with some of SCA major customers and have been waiting on important feedback from them before replying to your letter.

You may also be aware that Greenpeace International recently published a report ([‘Countdown to extinction’](#)), which includes a case example on SCA (*Pulping the Sámi way of life*). We kindly refer you to pages 84-87.

Increased transparency on SCA voluntary set-aside areas

It is said that *‘with integrity, you have nothing to hide’*.

In 2013, the Swedish Society for Nature Conservation (SNF) demanded that forestry companies share mapping data on its voluntary set-aside areas with the government authorities and the public.¹ This demand fell on deaf ears.

However, in your letter dated 23 April 2019 you stated that SCA shares Greenpeace’s view that the company *‘can improve the availability of information about [the company’s] set-asides, conservation areas and ecological plans.’* Specifically, we asked you to share *‘existing and planned private set-aside conservation areas (shared as QGIS mapping layers)’*.

Whilst you have not yet shared this GIS data directly with us, you stated that SCA will publish *‘user-friendly GIS’* maps of the company’s voluntary set-aside areas - and that this data would be published on SCA’s website *‘before the summer’*.

SCA’s website still states: *‘SCA will on www.sca.com publish detailed geographic information on the company’s extensive set-asides of forests for biodiversity, to make it easier for everyone who wants to see the nature qualities that the company preserves in this way.’*²

It is now mid-summer and we haven’t seen such GIS data on your website - although you have published our previous letter to you and your subsequent response. Please clarify why the GIS data on SCA’s forest set-asides has not been published, as promised.

¹ www.naturskyddsforeningen.se/sites/default/files/dokument-media/rapporter

² www.sca.com/en/

SCA needs to urgently prioritise and increase its voluntary set-aside areas within High Value Forest Landscapes

In your letter, you provide statistics on SCA's so-called 'set asides' for nature conservation.

We are aware of the various distinctions between voluntary set-asides and other so-called 'conservation areas' from SCA's website and published reports. For example, we note from SCA Annual Report (2018) that as of 31 December 2018, 20% (400,000ha) of SCA's 'productive forest land is set aside for nature conservation',³ and is therefore excluded from its logging operations.⁴ Of this 20% figure:

- 8.2% (166,000 hectares) is made of up geographical areas of forest land which are set aside from logging in 'voluntary set aside areas',⁵ of which ~20,000 hectares comprises of 'woodland key habitats'.⁶
- 11.7% (234,000 hectares) is made up of lots of small fragments of forest land excluded from logging, such as individual or groups of trees that are left standing when a forest area is clearfelled for example.⁷ (by the way, the 13% figure you provided in your letter differs from the 11.7% figure included in SCA's 2018 Annual Report).

Based on the figures above and in your letter, only 1% of SCA's 2 million hectares of productive forest land is within voluntary set-aside areas that overlap with 'woodland key habitat', a category of ecologically important forest which forest owners are required not to log under the FSC Swedish Standard for Forest Certification.

How much of the remaining 146,000 hectares within SCA's voluntary set-aside areas is within other ecologically important areas inside or outside High Value Forest Landscapes is unknown to Greenpeace. Will SCA now make this geographical data public?

Further, SCA claims that '*in order to preserve plants and animal the nature conservation must be planned from a landscape perspective*' and that the company has established a number of so-called 'ecological landscapes' between 5,000 and 50,000 hectares in size. SCA claims to have '*set individual objectives for each landscape, such as setting aside at least 2.5% of the forest for conservation areas.*'

No geographical data has been disclosed by SCA on the location of these so-called 'landscapes', the areas permanently set aside from logging within these landscapes, nor whether these landscapes overlap with High Value Forest Landscapes for example. Will SCA now make this geographical data public?

As Swedish Environmental Protection Agency (EPA) reports notes, forestry companies such as SCA have key role to play in:

³ www.sca.com/globalassets/sca/investerare/arsredovisningar-pdf/sca_annual-report-2018_eng.pdf

⁴ www.sca.com/en/about-us/our-forest/our-environmental-work/ecological-landscape-planning/

⁵ www.sca.com/globalassets/sca/investerare/arsredovisningar-pdf/sca_annual-report-2018_eng.pdf

⁶ www.sca.com/en/about-us/our-forest/our-environmental-work/nature-conservation-strategy/

⁷ www.sca.com/en/about-us/our-forest/our-environmental-work/nature-conservation-strategy/

a) disclosing the spatial locations of set-aside areas (ie voluntary set-aside areas) and to what extent these are located in värdestrakter (ie High Value Forest Landscapes) and;

b) prioritising the protection of Värdekärna/‘value cores’ - considered by the County Administrative Board and the Swedish Forest Agency to be of great importance for fauna and flora and/or constitutes a ‘priority forest type’⁸ - within värdestrakter (ie High Value Forest Landscapes), for example.

Various EPA reports state, for instance:

‘Transparency about where the voluntary set-aside areas exist is important. It provides opportunities to optimize the formal protection and strengthen the strategic nature conservation work.’⁹ (p.24)

‘In order to strengthen the strategic nature conservation work, it is important to have openness about the voluntary set aside areas, for example to get information about the extent to which they are included in värdestrakter.’¹⁰(p.28)

‘Ultimately, the aim should be to achieve a higher degree of transparency from all actors, which both gives increased weight to voluntary set-aside areas in the planning of formal protection and forestry actors a greater responsibility regarding ensuring the duration and quality of the set-aside areas.’¹¹ (p.17)

‘It is desirable that value cores that cannot be formally protected are prioritised within the voluntary set-aside areas.’¹² (p.37)

Voluntary set-aside areas are particularly suitable and desirable for value cores that cannot be prioritised for formal protection but which support green infrastructure [the working name for the process related to establishing värdestrakter/High Value Forest Landscapes].¹³ (p.56)

SCA’s plans on lodgepole pine plantations

On the issue of SCA’s lodgepole pine (contorta) plantations, and its impacts on both biodiversity and Sámi reindeer-herding livelihoods, your letter continue to deny the explicit demands of all 44 Sámi communities in Sweden: in August 2017 they reconfirmed their ‘zero tolerance’ for lodgepole pine in reindeer herding areas,¹⁴ which they have opposed since 2008. Specifically they have demanded that SCA, and other players in the Swedish forestry sector, ‘stop planting lodgepole pine in the reindeer husbandry area and develop a plan for the disposal of existing stocks’ of the species.

⁸ p 3 www.skogsstyrelsen.se/globalassets/aga-skog/skydda-skog/bilaga-2a-skogliga-vardekarnor-i-sverige.pdf;

⁹ p 71 www.naturvardsverket.se/Documents/publikationer6400/978-91-620-6762-5.pdf?pid=

¹⁰ www.naturvardsverket.se/Documents/publikationer6400/978-91-620-6762-5.pdf?pid=20351

¹¹ www.naturvardsverket.se/upload/miljoarbete-i-samhallet/miljoarbete-i-sverige/regeringsuppdrag/2017/vardefulla-skogar-redovisning-av-regerin-gsuppdrag-2-170130.pdf

¹² www.naturvardsverket.se/upload/miljoarbete-i-samhallet/miljoarbete-i-sverige/regeringsuppdrag/2017/vardefulla-skogar-redovisning-av-regerin-gsuppdrag-2-170130.pdf

¹³ www.naturvardsverket.se/Documents/publikationer6400/978-91-620-6762-5.pdf?pid=20351

¹⁴ www.sapmi.se/nolltolerans-mot-contorta-renskotselomradet/

In October 2017, Olle Höjer from the Swedish Environmental Protection Agency (EPA) was quoted, in Sweden's largest national newspaper, as saying: *'Greenpeace is right that the High Value Forest Landscape are important and logging of valuable forests is worrying. But forestry can normally continue, for example, harvesting of planted Contorta can help restore the forest.'*

¹⁵

Rather than coming up with a genuine plan to remove the ~300,000 hectares of lodgepole pine plantations already established in Sámi reindeer herding areas, you simply argue that SCA wants to *'seek together with the Sami villages and with Samiid Riikasearvi (SSR) opportunities to make good use of the contorta pine's superior growth potential where it does not impede reindeer herding.'*

Clearly, SCA's *'head is still in the sand'* on this issue and the company just wishes to continue to maintain its extensive use of lodgepole pine plantations established in Sámi reindeer herding areas.

How many hectares of lodgepole pine plantations has SCA established in Sámi reindeer herding areas since the 44 Sámi communities issued their 'zero tolerance' policy in August 2017? Please publish maps of these planted areas.

Your letter states that *'on several occasions [SCA] have agreed to remove contorta [lodgepole pine] stands that have been in severe conflict with reindeer herding'*. How many hectares has been removed since the 44 Sámi communities issued their 'zero tolerance' policy in August 2017? Please publish maps of these areas.

Transparency of the impacts of SCA's expansion plans on High Value Forest Landscapes and Sami reindeer herders livelihoods

In our letter dated 20 March 2019, we also asked you to provide greater transparency on how SCA plans to meet existing and future wood raw material demands, in light of the company's recent pulp mill expansion. We specifically asked *'how does SCA plan to feed this mill without further impacting 'High Value Forest Landscapes' or the forests that the Sámi reindeer herders depend on?'*

Your letter of 23 April 2019 chose to 'gloss over' this critical question and simply responded with various empty and rhetorical statements, such as:

'Both the preservation of biodiversity and concern for Sami reindeer-herding in the lands which we use together, are sustainability objectives of the highest importance. We devote substantial resources to both these ends.'

'...we will not increase the harvesting in our own forests until our younger and well-growing forests are ripe for harvesting in a decade or two. We will source the volumes needed from the same sources as today.'

¹⁵ www.dn.se/nyheter/sverige/greenpeace-blockerade-scas-storsta-pappersmassafabrik/

The latter statement confirms that SCA's '*younger and well-growing*' planted forests are not mature enough to be logged for the next decade or two. As such, SCA will continue with its business-as-usual approach to rely on the logging areas of older forests that remain outside protected areas. This includes the continued logging of remaining areas of old-growth forests that have never been logged by clearcutting, so-called 'continuity forests'.

According to a report by the Swedish University of Agricultural Sciences (SLU), '*the transformation of continuity forests [in the boreal] into production forests*' is to blame for the ongoing decline in three-quarters of red-listed forest-dependent species. SLU argues that at present rates of logging in Sweden the remaining old-growth forests that remain outside protected areas will be lost within 20 years.¹⁶

Given you failed to answer the above question in your last letter, we will ask it again more bluntly: Will SCA - and its third-party wood suppliers - now take decisive action by:

- a) Refraining from the logging of areas mapped as '*continuity forests*' (i.e. forests which have never been clearcut) within High Value Forest Landscape (i.e. '*forest landscapes with particularly high ecological preservation values*', which are also important forest for Sámi reindeer herding)?
- b) Permanently stopping the planting lodgepole pine (contorta) plantations in reindeer herding areas?
- c) Develop a comprehensive time-bound action plan to remove all lodgepole pine (contorta) plantations within reindeer herding areas?

Thank you for your personal attention to these critical issues. I personally look forward to receiving a clearer and unambiguous reply to this letter.

With best regards,



Mads Christensen
Executive Director
Greenpeace Nordic

¹⁶ *Since 1950, about 60% of Sweden's productive forest land has been clear-cut and converted into production forests. Within 20 years, the same transformation will occur for all older forests that remain outside protected areas. With today's development, 5% of Sweden's productive forest land will be protected forest and 95% will constitute as so called production forest.*

www.artdatabanken.se/globalassets/ew/subw/artd/2.-var-verksamhet/publikationer/6.tillstandet-i-skogen/rapport_tillstandet_skogen.pdf