

## Forest Stewardship Council®







# Forest Management Certification Audit Report

FSC-FM-V1-0 - EN

Certificate holder name SVEASKOG FÖRVALTNINGS AB

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Former certificate code (if any)
Certificate code BV-FM/COC-008344

FSC license code
Audit type
Surveillance
Audit start date
Sep 20, 2021
Date of report
Dec 21, 2021
Certification date
Jan 27, 2009

**Certification body** 

Certification body name Bureau Veritas Certification Holding SAS

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#### Introduction

**SLIMFs:** The elements marked with an asterisk (\*) in this report are NOT required in the case of certificates issued to single SLIMF MU but are required for all other certificates.

**Voluntary fields:** The elements marked with hashtag (#) in this report are NOT mandatory but can be completed voluntarily.

**Non-public fields:** The elements marked with dollar symbol (\$) in this report will NOT be reproduced in the FM public summary, e.g. personal information.

**Unit:** Data presented in the report will be provided in metric system units. If nonmetric units are used, conversion rates will be indicated below, and an automatic conversion into metric units will be performed and stored in the cloud.

The entire report is based on the same units for one type of measure, which are selected from unit drop-down lists and the selections are synchronous across the document.

Unit of area: 1 ha equals 1 ha, e.g. forest area, HCV area.

Unit of volume: 1 m3 equals 1 m3, used for wood related product.

Unit of **weight**: 1 **ton** equals 1 **metric ton**, used for non-timber products i.e. bamboo, rubber and resin.

Unit of **pesticide**: **kg**, kg of dry mass is preferred rather than litres, due to unknown concentrations.

#### Repeating section:

This report contains many repeating sections e.g. species, MU/RMU, non-conformities etc., please add more tables by clicking **plus (+)** button.

### 1. Description of forest management

Forest management enterprise (FME) information			
1.1 Type of FM certificate	Multiple MUs		
1.2 Total area under evaluation	3903000 <b>ha</b>		
1.3 Dual-certified area certified both as FSC and another scheme*	3903000 ha		
1.4 Forest zone	Boreal		
1.5 Male forest workers	Totalt Sveaskog: 560 Skogsrörelsen: 372		
1.6 Female forest workers	Totalt Sveaskog: 207 Skogsrörelsen: 83		
1.7 Third parties related/impacted by forest			
management activities	☐ Traditional people		
1.8 Third party description (existence, interests or activities etc.)*	The Sámi are indigenous people inhabiting the region of Sápmi. They traditionally practice reindeer herding that is much affected by forestry activities. They also have historical and cultural places that need to be considered by the forest manager. Local communities in entire Sweden are affected by forestry activities and land use change such as wind power plant projections.		
1.9 Area of forest owned/managed but excluded from MUs in the scope of certification	5868.3 <b>ha</b>		
1.10 Total growing stock of broadleaves #	27653511 <b>m3</b>		
1.11 Total growing stock of conifers #	278467056 <b>m3</b>		

1.12 Ecosyster	m services(ES) in the scope	□Yes (annex B to be completed)			
1.13 Change o	of scope since previous audit	☐Yes, the scope has changed as described below:			
i. Main commercial timber species included in scope of certificate (botanical name and common trade name)					
1.14 Species  Picea_abies  Note: Author's name of species will not be displayed in the report, but only in the database. The "_" symbol is used instead of a space for spelling check and validation purposes.		1.15 Product code	<ul><li>☑W1.1 Roundwood (logs)</li><li>☑W1.2 Fuel wood</li><li>☑W1.3 Twigs</li><li>☐W3.1 Wood chips</li><li>☐N5.1 Natural bamboo</li></ul>		
1.16 Trade name#	Gran	1.17 Current annual harvest	2179159 <b>m3</b>		
1.18 Click or tap here to enter text. Remarks#		1.19 Sold with FSC claim since previous audit/year	2179159 <b>m3</b>		
ii. Main commercial timber species included in scope of certificate (botanical name and common trade name)					
		Common trade	rianie)		
1.14 Species	Pinus_sylvestris  Note: Author's name of species will not be displayed in the report, but only in the database. The "_" symbol is used instead of a space for spelling check and validation purposes.	1.15 Product code	<ul> <li>W1.1 Roundwood (logs)</li> <li>W1.2 Fuel wood</li> <li>W1.3 Twigs</li> <li>W3.1 Wood chips</li> <li>N5.1 Natural bamboo</li> </ul>		
1.14 Species  1.16 Trade name#	Pinus_sylvestris  Note: Author's name of species will not be displayed in the report, but only in the database. The "_" symbol is used instead of a space for spelling check and	1.15 Product	<ul><li>W1.1 Roundwood (logs)</li><li>W1.2 Fuel wood</li><li>W1.3 Twigs</li><li>□W3.1 Wood chips</li></ul>		
1.16 Trade	Pinus_sylvestris  Note: Author's name of species will not be displayed in the report, but only in the database. The "_" symbol is used instead of a space for spelling check and validation purposes.	1.15 Product code  1.17 Current	<ul> <li>W1.1 Roundwood (logs)</li> <li>W1.2 Fuel wood</li> <li>W1.3 Twigs</li> <li>W3.1 Wood chips</li> <li>N5.1 Natural bamboo</li> </ul>		
1.16 Trade name# 1.18 Remarks#	Pinus_sylvestris  Note: Author's name of species will not be displayed in the report, but only in the database. The "_" symbol is used instead of a space for spelling check and validation purposes.  Tall  Click or tap here to enter text.	1.15 Product code  1.17 Current annual harvest  1.19 Sold with FSC claim since previous audit/year	<ul> <li>W1.1 Roundwood (logs)</li> <li>W1.2 Fuel wood</li> <li>W1.3 Twigs</li> <li>W3.1 Wood chips</li> <li>N5.1 Natural bamboo</li> <li>2997887 m3</li> <li>2997887 m3</li> <li>cope of certificate (botanical</li> </ul>		

1.16 Trade name#	Björk	1.17 Current annual harvest	312002 <b>m3</b>			
Remarks#		1.19 Sold with FSC claim since previous audit/year	312002 <b>m3</b>			
iv. Main commercial timber species included in scope of certificate (bota name and common trade name)						
		1.15 Product code	<ul><li>☑W1.1 Roundwood (logs)</li><li>☑W1.2 Fuel wood</li><li>☑W1.3 Twigs</li><li>☐W3.1 Wood chips</li><li>☐N5.1 Natural bamboo</li></ul>			
1.16 Trade name#	Bok	1.17 Current annual harvest	2708 <b>m3</b>			
1.18 Click or tap here to enter text. Remarks#		1.19 Sold with FSC claim since previous audit/year	2708 <b>m3</b>			
v. Maii			cope of certificate (botanical			
	name and	common trade	name)			
1.14 Species	Pinus contorta  Note: Author's name of species will not be displayed in the report, but only in the database. The "_" symbol is used instead of a space for spelling check and validation purposes.	1.15 Product code	<ul><li>⋈W1.1 Roundwood (logs)</li><li>⋈W1.2 Fuel wood</li><li>⋈W1.3 Twigs</li><li>□W3.1 Wood chips</li><li>□N5.1 Natural bamboo</li></ul>			
1.16 Trade name#	Contorta	1.17 Current annual harvest	64376 <b>m3</b>			
1.18 Click or tap here to enter text. Remarks#		1.19 Sold with FSC claim since previous audit/year	64376 <b>m3</b>			
vi. Maiı		s included in so common trade	cope of certificate (botanical name)			
1.14 Species	Larix spp  Note: Author's name of species will not be displayed in the report, but only in the database. The "_" symbol is used instead of a space for spelling check and validation purposes.	1.15 Product code	<ul><li>☑W1.1 Roundwood (logs)</li><li>☑W1.2 Fuel wood</li><li>☑W1.3 Twigs</li><li>☐W3.1 Wood chips</li><li>☐N5.1 Natural bamboo</li></ul>			
1.16 Trade Lärk 1		1.17 Current annual harvest	5772 <b>m3</b>			

Remarks#		1.19 Sold with FSC claim since previous audit/year	5772 <b>m3</b>				
vii. Main commercial timber species included in scope of certificate (botanical name and common trade name)							
1.14 Species	Populus tremula  Note: Author's name of species will not be displayed in the report, but only in the database. The "_" symbol is used instead of a space for spelling check and validation purposes.	1.15 Product code	<ul><li>☑W1.1 Roundwood (logs)</li><li>☑W1.2 Fuel wood</li><li>☑W1.3 Twigs</li><li>☐W3.1 Wood chips</li><li>☐N5.1 Natural bamboo</li></ul>				
1.16 Trade name#	Asp	1.17 Current annual harvest	4219 <b>m3</b>				
1.18 Remarks#	Click or tap here to enter text.	1.19 Sold with FSC claim since previous audit/year	4219 <b>m3</b>				
viii. Mai		es included in s I common trad	scope of certificate (botanical e name)				
1.14 Species	Quercus_robur  Note: Author's name of species will not be displayed in the report, but only in the database. The "_" symbol is used instead of a space for spelling check and validation purposes.	1.15 Product code	<ul><li>☑W1.1 Roundwood (logs)</li><li>☑W1.2 Fuel wood</li><li>☑W1.3 Twigs</li><li>☐W3.1 Wood chips</li><li>☐N5.1 Natural bamboo</li></ul>				
1.16 Trade name#	Ek	1.17 Current annual harvest	1097 <b>m3</b>				
1.18 Remarks#	Click or tap here to enter text.	1.19 Sold with FSC claim since previous audit/year	1097 <b>m3</b>				
i.	NTFP - non-timber forest p	product includ	ed in scope of certificate				
1.20 Species #	Click or tap here to enter text.  (No species validation for NTFP, can be null here)	1.21Product code of NTFP	Choose an item.				
1.22 Trade name#	Click or tap here to enter text.	1.23 Current annual harvest	Click or tap here to enter text. ton				
	·						
	i. Pesticide use	since previou	s audit/year				
1.24 Active ingredient			1.25 Applied Click or tap here to enter text. ha				

1.26 Reason for use	Click or tap here to enter text.	1.27 Quantity of ingredient	Click or tap here to enter text. <b>kg</b>
1.28 Summary of ESRA (If applicable)		1.29 Environmental and social risk assessment (ESRA)	□ Applicable

No chemical pesticides have been used since last surveillance audit.

2. Summary of forest context and management plan The following table is only applicable for main and re-evaluations.
2.1 Legislative, administrative and land use context of the forest operation*
Click or tap here to enter text.
2.2 Roles of responsible government agencies involved in aspects of forest management*
Click or tap here to enter text.
2.3 Ownership and use-rights (both legal and customary) of lands and forest of <b>external parties</b> other than the certificate holder
Click or tap here to enter text.
2.4 Non-forestry activities being undertaken within the area evaluated, whether they are undertaken by the certificate holder or by some other party (e.g. mining, industrial operations, agriculture, hunting, commercial tourism, etc.)
□0 mining □1 industrial operation ⊠2 agriculture ⊠3 hunting ⊠4 commercial tourism ⊠5 other, please specify fishing, gravel pits, wind power, reindeer husbandry
2.5 Services provided to local communities#
2.6 Brief description of any area of forest over which the certificate holder has some responsibility, whether as owner (including shared or partial ownership), manager, consultant or other responsibility) which the certificate holder has chosen to exclude from the scope of the certificate, together with an explanation of the reason.

The experimental parks are excluded from the scope as there is a lack of clarity about the issue within FSC. Sveaskog would like to include experimental parks in the certificate. Collaboration agreements with universities / researchers exist and ongoing contact between researchers and Sveaskog is ongoing during the year.

2.7 Forest management objectives
Click or tap here to enter text.
2.8 Land use and ownership status of the forest resource
Click or tap here to enter text.
2.9 Socio-economic conditions of the forest management
Click or tap here to enter text.
Click of tap here to enter text.
2.10 Brief description of forest composition
Click or tap here to enter text.
2.11 Profile of adjacent lands
□0 urban □1 agriculture □2 wetland □3 mining □4 desert □5 pasture
☐ 6 orchards ☐ 7 other, please specify Click or tap here to enter text.
2.12 Management structure of the certificate holder
Click or tap here to enter text.
2.42 Division of forest recognization and bilities
2.13 Division of forest management responsibilities
Click or tap here to enter text.
2.14 Use of contractors by the certificate holder
⊠0 silviculture ⊠1 road building ⊠2 harvesting ⊠3 transportation ⊠4 forest protection
☐ 5 pest and disease control ☐ 6 other, recreational purposes
2.15 Training implemented by the certificate holder

Click or tap here to enter text. 2.16 Species selection and rationale □1 fast growing □2 pest & disease resistant ☐3 climate change □ 0 other, please specify Click or tap here to enter text. 2.17 Silvicultural system/regime implemented by the certificate holder Click or tap here to enter text. 2.18 Technique used for harvesting operations of the certificate holder □0 mechanized harvesting □1 manual harvesting □2 semi-mechanized harvesting  $\square$ 3 animal hauling  $\square$ 4 other, please specify Click or tap here to enter text. ☐0 buffer zone □1 chemical use control □2 conservation area set aside □3 erosion control \( \subseteq 4 \) other, please specify Click or tap here to enter text. Click or tap here to enter text. 2.21 Management strategy for the identification and protection of rare, threatened and endangered Click or tap here to enter text. 2.22 Forest monitoring methods implemented by the certificate holder □2 drone monitoring ☐4 social survey **5**  □ 1 forest inventory ☐3 remote sensing sampling plots  $\Box 6$  other, please specify Click or tap here to enter text. Click or tap here to enter text.

2.24 Environmental and social impacts, and costs, productivity, and efficiency

Click or tap here to enter text.

2.25 Explanation of the assumptions (e.g. silvicultural) on estimate of the maximum sustainable yield for the main commercial species
Click or tap here to enter text.
2.26 Reference to the source of data (e.g. inventory data, permanent sample plots, yield tables) on which estimates are based
2.27 Investments and measures taken for the prevention and control of fire#
2.28 If applicable, explanation of how the MU meets the eligibility criteria as a SLIMF (FSC-STD-01-003 SLIMF eligibility criteria).
Click or tap here to enter text.
2.29 The risk of products from non-certified sources (including any areas specifically excluded from
the scope of the certificate) being mixed with products from the forest area evaluated
Click or tap here to enter text.
2.30 Explanation of the control (tracking and tracing) systems in place that address the risk
identified
Click or tap here to enter text.
2.31 The documentation or marking system that allows products from the certified forest area to be reliably identified
□0 documents with transportation □1 tree mark □2 bar code or quadratic code
☐ 3 other, please specify Click or tap here to enter text.
2.32 Elaboration of the chain of custody documentation or marking system
Click or tap here to enter text.
2.33 The final point or forest gate of the certified product
□1 log yard □2 road side □0 other, please specify Click or tap here to enter text.
2.34 The main obstacles to meeting the requirements of FSC certification#
Click or tap here to enter text.
2.35 The main changes incurred after FSC certification#

Click or tap here to enter text.

2.36 Main strengths and weaknesses with respect to the overall conformity with the Forest Stewardship Standard used for the evaluation

Click or tap here to enter text.

#### **Definition for MU and RMU:**

**Management Unit (MU)**: A spatial area or areas submitted for FSC certification with clearly defined boundaries managed to a set of explicit long-term management objectives which are expressed in a management plan. This area or areas include(s):

- all facilities and area(s) within or adjacent to this spatial area or areas under legal title or Management control of, or operated by or on behalf of The Organization, for the purpose of contributing to the management objectives; and
- all facilities and area(s) outside, and not adjacent to this spatial area or areas and operated by or on behalf of The Organization, solely for the purpose of contributing to the management objectives.

(Source: FSC 2011).

**Resource Management Unit (RMU)**: the management units within a group managed by the same Resource Manager. The management units within an RMU do not need to belong to the same forest owner, they can belong to many different owners.

Note: The total area of MU/RMU shall be consistent with total area under evaluation. In case of a large number of small group members, they shall be sub-grouped to RMU(s) by geographical location or tenure, and inserted in to the MU/RMU tables one by one.

Please click the add button for more MU/RMUs to be added, the total area of all MU/RMU shall be consistent with area under evaluation on page 3. In the scenario of a large number of group members, the total area can be reported at group entity level with total area of members.

The figures below reflect the productive forest land only. The low-productive forest land, where no commercial activities are undertaken is certified and is important from the perspective of overall ecological structure of the lands. See appendix with separated information per FMU:s.

i. MU/RMU					
2.37 MU/RMU name	Sweden	2.38 Tenure- ownership	State	2.39 Tenure- management	State
2.40 Centroid Longitude*	16.045310	2.41 Centroid Latitude*	61.829207	2.42 SLIMF type	Non-SLIMF
2.43 Plantation area	0.0 <b>ha</b>	2.44 Replanted forest area	487541 <b>ha</b>	2.45 Natural regenerated forest area	57209 <b>ha</b>
2.46 Conservation area	259130 <b>ha</b>	2.47 Strictly protected area	198508 <b>ha</b>	2.48 NTFP area	0 <b>ha</b>
2.49 Total area of MU/RMU (automated)	3036572 ha	2.50 Annual allowable cut (AAC)	6253000 m <b>3</b>	2.51 Area with ecosystem	0 <b>ha</b>

services
claim#

HCV list					
2.52 Main HCV attribute	2.53 Secondary HCV attribute #	2.54 HCV area	2.55 HCV description		
HCV1 Species diversity	Choose an item.	63900 <b>ha</b>	a) concentration of Woodland Key Habitats,		
HCV2 Landscape- level ecosystems and mosaics	Choose an item.	58500 <b>ha</b>	b) subalpine forests of category 1 and 2, at altitudes above the nature conservation boundary		
HCV4 Critical ecosystem services	HCV5 Community needs	31400 <b>ha</b>	c) defined water protection areas		
HCV1 Species diversity	HCV3 Ecosystems and habitats	207500 ha	d) wetlands of national and international significance		
HCV1 Species diversity	HCV3 Ecosystems and habitats	174900 <b>ha</b>	e) water environments of particular national value		
HCV1 Species diversity	HCV2 Landscape- level ecosystems and mosaics	277800 ha	f) Natura 2000 areas, nature reserves, and cultural reserves		
HCV5 Community needs	HCV6 Cultural values	16100 <b>ha</b>	g) sites of special significance for the Sami		
HCV6 Cultural values	Choose an item.	45700 <b>ha</b>	h) registered archaeological monuments and cultural remains of nation-wide interest		

Note: The secondary HCV attribute should be completed only if two HCV attributes overlap in the same area, e.g. one piece of land is qualifies as both HCV 3 and 4. Please add rows for boundary separated HCV areas.

Forest management group					
Total number of group members	Click or tap here to enter text.	Maximum manageable number of group members	Click or tap here to enter text.		
Number of members sampled annually by group entity	Click or tap here to enter text.	Sampling system implemented by the group entity	<ul><li>□1 stratified sampling</li><li>□2 cluster sampling</li><li>□3 random sampling</li><li>□4 systematic sampling</li></ul>		

		Group mem	ber list		
Group member Name	public contact	address	Email (if available)	sub-code (if applicable)	forest area
Click or tap here to enter text.	□ Yes		Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text. ha

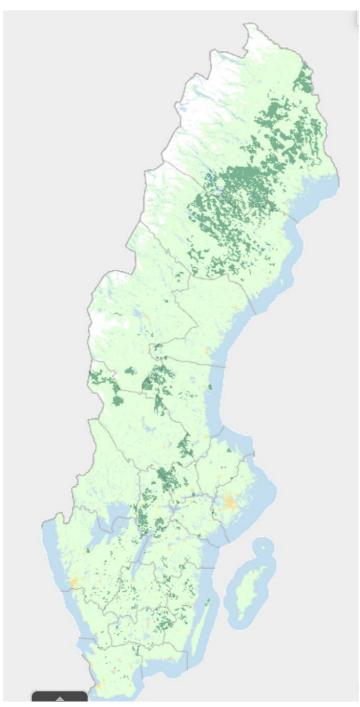


Figure 1. Forest Map of the Management unit.



Figure 2. Map of the Sámi villages in Sweden – explanation on the right shows Sami villages and Concession Sami villages.

### 3. Standard(s)

3.1 Standard(s) used for evaluation	FM standard type: National Forest Stewardship Standard (NFSS) based on V5
	Related standards:
	☐ Group standard FSC-STD-30-005
	☐ ES procedure FSC-PRO-30-006
3.2 Reference to FM standard used	FSC-STD-SWE-03-2019
3.3 http link to the standard used	https://se.fsc.org/se-se/standarder/skogsbruksstandard-2020
3.4 If applicable, the adaptation process of CB interim standard*	N/A

## 4. The evaluation process

The evaluation dates					
4.1 Audit start date	Sep 20, 2021				
4.2 Audit finish date	Nov 15, 2021				
4.3 Total person days	19 Man days				

Note: The total person days spent on the evaluation including time spent on remote work and time spent carrying out on-site work (incl. review of documents and records, interviewing stakeholders), but excluding travel to and from the region in which the certified forest is located.

	Personnel/audit team\$						
4.4 Name	4.5 Role	4.6 Person days	4.7 Expertise	4.8 Auditor UAN	4.9 Profile (brief introduction of the person)		
X	Team leader	15	Forestry	Click or tap here to enter text.	Msc in Forest ecology, Finland. More than 10 years of experience in forest certification.		
X	Team member	5	Forestry	Click or tap here to enter text.	Msc in Forestry, Sweden. More than 20 years of experience in forest certification.		
External expert	Team member	1	Economics	Click or tap here to enter text.	PhD, chief economist, external expert in forest economy and modelling		
External experts at Forest Agency	Team member	3	Ecology	Click or tap here to enter text.	Experts in nature value assessment in Norrbotten and Dalarna		

4.10 Sampling system employed for the audit  □2 cluster sampling □3 random sampling □4 systematic sampling □4 systematic sampling □4 systematic sampling □5 systematic sampling □6 systematic sampling □6 systematic sampling □7 systematic sampling □8 systematic sampling □9 systematic sampling □9 systematic sampling □9 systematic sampling □9 systematic systematic sampling □9 systematic		Sampling and documents
4.11 Rationale for selection of MU/ members  Determined in compliance with FSC-STD-20-007 v3.0 . 2 out of 5 MU were visited.  Sveaskog has 5 FMU:s. RO Norrbotten. RO Västerbotten. RO Södra Norrland. RO Bergslagen and RO Götaland  The minimum size of the sample required for that surveillance audit shall be at least half the number of forest enterprises visited during the main evaluation, that is shall not be smaller than 2 units. This follows the application of the formula used during main evaluation, namely X= 0.8 * 'y (y= all forest enterprises included in the scope of certification = 5) and is in line with FSC requirements that specifies the required sample size accordingly to the number of the forest enterprises making up Sveaskog under evaluation (5 FMUs)  The selected MU:s was RO Södra Norrland and MU Norrbotten, both visited with focus on complaints  Sites related to complaints to Sveaskog and Bureau Veritas were selected  Sites were chosen to reflect different aspects to reflect the risk, such as soil preparation, sliviculture, thinning and harvesting. Planned, ongoing and finished operations were selected.  4.12 Documentation reviewed during this audit  4.12 Documentation reviewed during this audit  2 long term management plan(s)  33 technical management guides relating to operations  4 concession agreements  5 documentation showing tenure or land-use rights  6 up to date maps of roads, management sites, etc  7 inventory records  8 work instructions  9 contractor contracts  10 agreements with affected local communities  11 agreements with affected local communities  11 agreements with affected Indigenous Peoples, etc  12 records of payments to royalties, fees, or taxes  13 records of complaints/disputes and resolution  14 records of payments to workers  15 wildlife evaluation records  16 environmental impacts monitoring records  17 social impact survey results		⊠1 stratified sampling
## A systematic sampling  ## A 1.11 Rationale for selection of MU// members  ## Determined in compliance with FSC-STD-20-007 v3.0 . 2 out of 5 MU were visited.  ## Sveaskog has 5 FMU:s. RO Norrbotten. RO Västerbotten. RO Södra Norrland. RO Bergslagen and RO Götaland  ## The minimum size of the sample required for that surveillance audit shall be at least half the number of forest enterprises visited during the main evaluation, that is shall not be smaller than 2 units. This follows the application of the formula used during main evaluation, namely X=0.8 ° v) (y= all forest enterprises included in the scope of certification = 5) and is in line with FSC requirements that specifies the required sample size accordingly to the number of the forest enterprises making up Sveaskog under evaluation (5 FMUs)  ## The selected MU:s was RO Södra Norrland and MU Norrbotten, both visited with focus on complaints  ## Sites related to complaints to Sveaskog and Bureau Veritas were selected  ## Sites were chosen to reflect different aspects to reflect the risk, such as soil preparation, sliviculture, thinning and harvesting. Planned, ongoing and finished operations were selected.  ## 1 copies of applicable laws  ## 2 long term management plan(s)  ## 3 technical management plan(s)  ## 3 technical management guides relating to operations  ## 4 concession agreements  ## 4 concession agreements  ## 5 documentation showing tenure or land-use rights  ## 6 up to date maps of roads, management sites, etc  ## 7 inventory records  ## work instructions  ## 9 contractor contracts  ## 10 agreements with affected local communities  ## 11 agreements with affected loidgenous Peoples, etc  ## 12 records of payments to workers  ## 12 records of payments to workers  ## 15 wildlife evaluation records  ## 16 environmental impacts monitoring records  ## 17 social impact survey results  ## 18 results of monitoring forest growth and health	employed for the audit	□2 cluster sampling
4.11 Rationale for selection of MU/members  Determined in compliance with FSC-STD-20-007 v3.0 . 2 out of 5 MU were visited.  Sveaskog has 5 FMU:s. RO Norrbotten. RO Västerbotten. RO Södra Norrland. RO Bergslagen and RO Götaland  The minimum size of the sample required for that surveillance audit shall be at least half the number of forest enterprises visited during the main evaluation, that is shall not be smaller than 2 units. This follows the application of the formula used during main evaluation, namely X= 0.8 * vy (y= all forest enterprises included in the scope of certification = 5) and is in line with FSC requirements that specifies the required sample size accordingly to the number of the forest enterprises making up Sveaskog under evaluation (5 FMUs)  The selected MU:s was RO Södra Norrland and MU Norrbotten, both visited with focus on complaints  Sites related to complaints to Sveaskog and Bureau Veritas were selected  Sites were chosen to reflect different aspects to reflect the risk, such as soil preparation, silviculture, thinning and harvesting. Planned, ongoing and finished operations were selected.  4.12 Documentation reviewed during this audit  4.12 Documentation reviewed during this audit  3.1 copies of applicable laws  2.2 long term management plan(s)  3.3 technical management guides relating to operations  4.1 copies of applicable laws  2.2 long term management sites retained to operations  4.2 concession agreements  5.5 documentation showing tenure or land-use rights  3.6 up to date maps of roads, management sites, etc  3.7 inventory records  3.8 work instructions  3.9 contractor contracts  3.10 agreements with affected local communities  3.11 agreements with affected local communities  3.11 agreements with affected local communities  3.12 records of payments to workers  3.13 records of complaints/disputes and resolution  3.14 records of payments to workers  3.15 wildlife evaluation records  3.16 environmental impacts monitoring records  3.17 social impact survey results		⊠3 random sampling
Automatical Superior		⊠4 systematic sampling
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	<ul><li>⊠20 chemical use records</li><li>⊠21 communications with stakeholders</li><li>⊠22 purchasing and sales documentation</li></ul>
4.13 Additional techniques employed for evaluation*	No additional audit techniques
4.14 Number of accidents since previous audit	67
4.15 Average wage for male workers including contractors \$#	Click or tap here to enter text. USD
4.16 Average wage for female workers including contractors \$#	Click or tap here to enter text. USD
4.17 Total local employment since previous audit (persons year) \$#	Click or tap here to enter text.
4.18 Indirect surcharge for FSC certification since previous audit \$#	Click or tap here to enter text. USD
4.19 Number of Stakeholders affected by operations since previous audit/year \$#	Click or tap here to enter text.
4.20 List of compensation provided to local communities with regard to the impacts of management activities \$#	Click or tap here to enter text.

# 4.21 Document name and date reviewed during this audit – exact document names are given in separate checklist \$

- 1. Forest Management Plan
- 2. HCVF assessments
- 3. Records from active harvests, harvests completed in the past year,
- 4. Corrective Action clearance evidence,
- 5. Documents related to roadwork, bridge installations, planting, pre commercial thinning, thinning
- 6. Operational Activity Summary
- 7. Training records
- 8. Complaint records
- 9. Accident records
- 10. Annual growth and harvest summary
- 11. Harvest Plans
- 12. Inspection Reports
- 13. Monitoring results
- 14. Internal audits
- 15. Procedures and instructions for FSC FM management
- 16. Records regarding stakeholder consultation and participatory planning with Sami

#### 17. Nature value assessments, instructions and follow-up results

	Audit itinerary					
4.22 Audit date	4.23 Hou rs	4.24 MUs or members	4.25 Activities	4.26 Site detail	4.27 Site type	
Sep 20, 2021	8	Central manageme nt	Opening meeting; Interviews, documents review.	RO Södra Norrland Office. Video conferences with experts and management representatives concerning documentary review of requirements as per audit plan	⊠Office	
Sep 20, 2021	8	Central manageme nt	Interviews, documents review	RO Södra Norrland Office. Video conferences with experts and management representatives concerning documentary review of requirements as per audit plan	⊠Office	
Sep 21, 2021	8	MU Södra Norrland	Office visit Site visits, Documents review, interviews with the field Staff and contractors	Ljusdal Sites visits: ongoing, planned or completed forestry operations, Siliviculture, Fertilizing, planting, precommercial thinning	□ Seed orchards □ Nursery □ Protected area □ Production forest area □ Workers' amenities □ Areas used by local communities and IP □ Water courses □ Forest roads □ Chemical storage sites □ HCVs □ Monitoring sites □ Office	
Sep 21, 2021	8	MU Södra Norrland	Office visit Site visits, Documents review, interviews with the field Staff and contractors	Ljusdal Sites visits: ongoing, planned or completed forestry operations,	□ Seed orchards □ Nursery □ Protected area □ Production forest area □ Workers' amenities □ Areas used by local communities and IP □ Water courses □ Forest roads □ Chemical storage sites □ HCVs □ Monitoring sites □ Office	
Sep 22, 2021	8	MU Södra Norrland	Site visits, Documents review, interviews with the field	Hedemora Sites visits: ongoing, planned or completed forestry operations, protected areas	□ Seed orchards □ Nursery ☑ Protected area ☑ Production forest area ☑ Workers' amenities	

			Staff and contractors		□ Areas used by local communities and IP □ Water courses □ Forest roads □ Chemical storage sites □ HCVs □ Monitoring sites □ Office
Sep 22, 2021	8	MU Södra Norrland	Site visits, interviews with the field Staff and contractors, Documents review,	Office and Forest location Stjärnsund	□ Seed orchards □ Nursery □ Protected area □ Production forest area □ Workers' amenities □ Areas used by local communities and IP □ Water courses □ Forest roads □ Chemical storage sites □ HCVs □ Monitoring sites □ Office
Sep 23, 2021	8	MU Södra Norrland	Site visits, interviews with the field Staff and contractors, Documents review,	Ore Sites visits: ongoing, planned or completed forestry operations, Eco Park Ejheden	□ Seed orchards □ Nursery □ Protected area □ Production forest area □ Workers' amenities □ Areas used by local communities and IP □ Water courses □ Forest roads □ Chemical storage sites □ HCVs □ Monitoring sites □ Office
Sep 23, 2021	8	MU Södra Norrland	Site visits, interviews with the field Staff and contractors, Documents review	Hofors Sites visits: ongoing, planned or completed forestry operations,	□ Seed orchards □ Nursery □ Protected area □ Production forest area □ Workers' amenities □ Areas used by local communities and IP □ Water courses □ Forest roads □ Chemical storage sites □ HCVs □ Monitoring sites □ Office

Sep 24, 2021	8	MU Södra Norrland	Site visits, interviews with the field Staff and contractors, Documents review	Idre/ Särna Sites visits: ongoing, planned or completed forestry operations	□ Seed orchards □ Nursery □ Protected area □ Production forest area □ Workers' amenities □ Areas used by local communities and IP □ Water courses □ Forest roads □ Chemical storage sites □ HCVs □ Monitoring sites □ Office
Sep 24, 2021	8	MU Södra Norrland	Site visits, interviews with Staff and stakeholders , Documents review	Sveg Office visit Sites visits: ongoing, planned or completed forestry operations	□ Seed orchards □ Nursery □ Protected area □ Production forest area □ Workers' amenities □ Areas used by local communities and IP □ Water courses □ Forest roads □ Chemical storage sites □ HCVs □ Monitoring sites □ Office
Oct 18, 2021	8	MU Norrbotten		Pajala. Audit of Sami complaints and participatory planning process.	⊠Office
Oct 19, 2021	8	MU Norrbotten		Pajala Överkalix Meetings with reindeer herders from two different Sami villages and ENGO representatives.	<ul><li>☑ Areas used by local communities and IP</li><li>☑ Office</li></ul>
Oct 20, 2021	8	MU Norrbotten		Arvidsjaur Audit of Sami complaints and participatory planning process. Meeting with reindeer herders from three Sami villages.	<ul><li>☑ Areas used by local communities and IP</li><li>☑ Office</li></ul>
Oct 21, 2021	8	MU Norrbotten	Office	Arvidsjaur Documentary review of complaints and interview with ENGO representative.	⊠Office
Octob er 2021	24	MU Norrbotten and Södra Norrland	Field	The Forest Agency experts evaluated nature values for five complaint sites	⊠ Field, potential HCVF
Nov 1, 2021	4	Central managemen t	Office	Documentary review connected to Complaints. Stakeholder interviews.	⊠Office

Nov 8,	4	Central	Office	Documentary review connected to Complaints	⊠Office
2021		managemen t		Complaints	

S	takeholder consultation process
4.28 First stakeholder consultation date for this audit	August 2, 2021
4.29 Means of engagement	
	□ Contacted by phone
	⊠ Email, or letter
	$\square$ Notice published in the national and/or local press
	☐ Notice published on relevant websites
	☐ Local radio announcements
	☐ Local customary notice boards
	☐ Social media broadcast
4.30 Engaged stakeholder	⊠ Economic interests
groups	Social interests     ■
	☑ FSC-accredited certification bodies active in the country
	☑ National and state forest agencies
	$\square$ Experts with expertise in controlled wood categories
	☐ Research institutions and universities
	$\hfill \square$ FSC regional offices, FSC network partners, registered standard development groups and NRA working groups in the region

Stakeholder comments							
4.31 Stake- holder group	4.32 Stake- holder description	4.33 Stakeholder's comment	4.34 Noti- fied before audit	4.35 Intervie wed during this audit	4.36 CB's follow up		
Environmen tal interests	Private person	Soil damages have been caused at Föttersbergsvägen North of Storvik in Gästrikland. Information and several pictures of soil damages on logging sites.			The cases were investigated through review of map of the area, aerial photographs, photographs sent by the complainant and logging information from the CH system. The work of the logging machine and forwarder is not fully in line with Sveaskogs internal instructions as driving paths should have been better reinforced.		

				Nevertheless, there are no signs of soil damage according to the definitions of the Forest Sector Targets (Målbilder); there is no damage to waterways, protected sites, cultural or recreational values. Sveaskog has since rolled out a campaign to avoid damages in the loggings (Mark, Människa, Miljö) that was seen to have effect, e.g on the choice of driving paths according to field inspections in audit.
Social interests	ENGO and Sámi village representatives	Forest rich in hanging lichens at Beässurjuhkatje in Arvidsjaur municipality, which Sveaskog felled in February 2021 in Mausjaur Sami village's reindeer grazing land. Sveaskog knew that the village wanted the forest to be left untouched.		Sveskog planned the area with the Sami village in 2019 and they officially gave permission to the fellings. The Sami village has not been in contact with Sveaskog to change the consent. The Sami have given consent for 7 ha out of 12 ha. They wanted felling in the winter time because the reindeer then get to feed on the lichens that fall to the ground. The certificate holder is surprised by the letter sent to the auditor because this forest has been agreed with the reindeer herders. No evidence of violation of standard requirements could be found as the standard requires both parties to follow a set procedure for co-planning in the reindeer herding areas. No evidence of violation of standard requirements could be found.
Environmen tal interests	ENGOs	The ENGO:s in Sweden have expressed concern related to the protection of Woodland Key Habitat after The Forest Agency published a report		Bureau Veritas has requested information from The Forest Agency regarding Sveaskog's share in the survey. It is worth noting that the 55,000 ha described in the report are not visited in their entirety in the

		where it is stated that probably 55 000 hectares of WKH have been logged in North West Sweden between years 2000 and 2018 (Development of the method for Nature value inventory in northwest Sweden. Report 2019/12). The report is based on a comparison between a test inventory carried out in 2018 for the development of the new method and a control inventory from the year 2000. The same comparison revealed that 128,000 ha of new key biotopes have also been added. It is not possible to obtain data for individual forest owners from the report.		field but are a statistical extrapolation from a sample survey. In summary the answer from the Forest Agency: Only two samples were taken on Sveaskogs holdings. The two samples are very small; representing 1/5 and 2/5, respectively of the average area of a sample in the survey. Examination of the two samples reveal differences that probably link to the accuracy of the respective map data at the two inventory occasions rather than different interpretations of the natural values in field. The conclusion is that the material from the Swedish Forest Agency concerning samples taken at Sveaskog's contribution to the report's conclusion regarding potentially harvested key biotope areas is small, if the data allows for such a conclusion, and that it is rather about differences in map data between the two inventories.
Environmen tal interests	ENGO	The ENGO expressed a concerns related to Sveaskog activities within the principles 1.3.1 and 5.2.1 in the FSC standard and the section 11 of the Forest Conservation Act (Skogsvårdslagen 1979:429) on the maximum harvesting area in the regeneration fellings, and section 10 of the same Act on the minimum age for regeneration fellings. The concern is related to a decreased wood		BV engaged an external expert on forest economics to evaluate the complaint. The statement is: "Based on gathered information, there is no evidence that Sveaskog violates principle 5.2.1 of the FSC Standard i.e., "timber harvesting levels do not exceed the harvest level that can be permanently sustained in the landholding". There is also no evidence that management activities are not carried out in compliance with applicable laws and regulations related to felling age, (1.3.1 in the

		supply on the market, suggesting that forest companies may have overfelled in certain regions. Based on media releases, they are also concerned that forest companies are felling increasingly younger forests, even violating the minimum age for regeneration felling and section 10 of the same Act on the minimum age for regeneration fellings.		FSC standard and the Forest Conservation Act). The auditors visited a large number of planned final fellings in the audit and could conclude that a couple were close to the minimum regeneration felling age, but none was below the harvest level that can be permanently sustained in the landholding". There is also no evidence that management activities are not carried out in compliance with applicable laws and regulations related to felling age, (1.3.1 in the FSC standard and the Forest Conservation Act). Reports with detailed analysis form the nonpublic Appendixes to this report.
Environmen tal interests	ENGO	The company intends to log the last remnants - 7 hectares of natural forest surrounded by 150 ha of felling on Tjappsåive in Arvidsjaur municipality. No natural value assessment is reported. Only that Östra Kikkejaure Sami village gave permission to the logging.		The auditor has asked the Forest Agency's expert to visit the area and their nature value assessment show that the forest is production forest (PG). There are "trivial" species and some "signal" species, but not enough structures to come up to Key Habitat status. The forest is close to the village and loggings have been made in history in this area. There is also no lack of protected forest in the same landscape. No deviation from standard requirements found.
Environmen tal interests	Local ENGO	The ecological landscape plan for Stjärnsund in southern Dalarna lacks the following information which according to the FSC standard Principle 6.8 should be included in an ecological landscape plan:  • analysis regarding lack of natural values		Sveaskogs website contains information on ecological landscape plans (ELP) in the form of maps and pdf - descriptions for each ELP. There are currently 180 ecological landscapes.  https://www.sveaskog.se/vart-skogsbruk/vart-naturvardsarbete/ekologiska-landskapsplaner

		and habitats in the landscape • analysis of the occurrence of red-listed species from a landscape perspective • need and benefit of recreating wetland and aquatic environments in a landscape perspective		Nevertheless the plans are not updated since 2017 and do not include all items required by the new FSC standard.  Please, see also details of the minor non-conformity NC10 raised in this regard.
Environmen tal interests	Local ENGO	Several contacts from Stjärsunds Skogsgrupp in Hofors in Dalarna county concerning planned and notified loggings by Sveaskog where threatened and protected (fridlysta) species such as Goodyera repens and Rana arvalis have been found. The ENGO also points out that threatened birds have not been considered in logging planning. All Swedish birds are covered by the Section 4 of the Species Protection Ordinance (Artskyddsförordning en), where Sweden has transposed the EU Birds Directive and the Habitats Directive into national law. EU legislation stands above and takes precedence over national legislation. EU member states are thus obliged to apply a strict interpretation of species protection legislation as stated in the EU judgment (ECLI: EU: C: 2021: 166). The European Court		The auditor visited the stakeholder and the area Lerhyttan/ Norrbäcksbo in the audit. The Forest Agency has made field inspections to all the forests that were under complaint and some new considerations to the logging planning have been made. Sveaskog and The Forest Agency have a dialogue concerning how the delineations should be made to consider the protected (fridlysta) species. The Forest Agency has decided to prepare special guidance for Goodyera repens, but for some species it is not clear if any additional guidance to the already existing general considerations documents will be provided (Rana arvalis and small birds). No loggings have still been made on the areas under complaint. The auditor considers that the dialogue with Forest Agency is relevant as the question how to consider species in the light of the EU Habitat- and Birds directives. The judgements that have recently been given in EU and Sweden need to be interpreted by the authorities and guidance needs to be formulated and communicated to the

of .	lustice	has
recentl	y clarif	ied that
		Directive
		all bird
species	s as	natural
occur	withi	n the
Europe	an ter	ritory of
		States,
and th	nus n	ot only
		species
that a	re par	ticularly
		and thus
		Annex 1
to tl	ne	Species
Protect	ion	
Regula		
(Judgn	nent	of the
		March
2021	in	Joined
		/19 and
C-474/	19).	

entire sector. No clear evidence of violation of standard criteria can be shown at this point.

The matter will be further analysed in the course of next audit while checking the actions related to the findings raised, including NVA topics.

Compla	aint(s)	received	<u> </u>			
4.37 Recei ved date	4.38 Firs t rec eive d by	4.39 Compl ainant	4.40 Complaint detail	4.41 Open/ Close d	4.42 Actions	4.43 Clos e date
Mar 23, 2021	FSC	Sami village	A Sámi reindeer herder informs that he has repeatedly been sought over telephone ("chased" in his own words) by Sveaskog's representative in order to set dates for planning meetings and get answers concerning loggings in the participatory planning process.	Closed	The reindeer herder was met and interviewed by the auditor. The complaint has resulted in a remark that is part of non-conformity NC06.	Nov 15, 2021
Apr 7, 2021	СВ	Local ENGO	Complaint regarding logging notification on Key biotope by the Lake Skiren in Högsby municipality, Kalmar county. Two logging notifications contain red-listed species and structures that indicate nature values.	Closed	Sveaskog has failed to identify the area as valuable in terms of nature values. The Forest Agency has classified one part as WKH. The case is part of the Major nonconformity NC01 that addresses the failures to perform correct conservation value assessments.	Nov 15, 2021

May 24, 2021	СВ	E- NGO	Logging of natural forest in Juoksuvaara, Pajala, should be stopped. Fellings started and activists stopped the machines during the felling.	Closed	BV asked the Forest Agency to perform a conservation value assessment of the forest. The outcome is that Sveaskog has correctly delineated the valuable areas out from logging and the area planned to be logged is production forest.	Nov 15, 2021
Apr 23, 2021	СВ	E- NGO and Sámi village s	Several contacts during 2021 concerning forests with high nature values that have been included in the participatory planning process with Sámi villages; Maskaure, Mausjaur, Västra and Östra Kikkejaure, The complainants say that Sveaskog wants to log valuable forests that are included in the participatory planning process. The message is also that forests suitable for winter grazing may soon not be available for the reindeers if Sveaskog's logging plans are executed.	Closed	Auditor conducted a stakeholder meeting with the representatives of Maskaure, Mausjaur and Västra Kikkejaure Sámi villages. The auditor also checked the documents from conducted participatory planning meetings. BV's conclusion is that Sveaskog acts according to the standard principles and does not plan any loggings before obtaining the consent from the Sámi village. Nature value assessment is conducted only after obtaining consent from the Sámi. There is no logging notification concerning the forests that are included in the participatory planning process. The first step in the process when planning loggings on Sámi reindeer herding lands is to consult with the Sámi. This year is the first year when the new participatory planning process is conducted acc. to STD requirements and 5-7 years of logging plans are discussed with the reindeer herders. Before 1-2 years management plans were discussed at a time. The increased amount of information demands time for processing from both parties and seems to be one reason for the increased concerns. No non-conformity identified.	Nov 15, 2021
Jun 22, 2021	СН	Local E- NGO	Sörboberget, Stjärnsund, Hedemora municipality. Felling report in forest where the protected orchide (Goodyer repens) is found. The association has reported the case to the Swedish Forest	Closed	The auditor visited the site with stakeholders. The complaints address two logging sites. Sveaskog requested guidance of the Swedish Forest Agency on how to address the findings of Goodyera repens. Sveaskog has re-planned the loggings	Nov 15, 2021

			Agency and after the Swedish Forest Agency did not stop felling, they have sued the Swedish Forest Agency for insufficient supervision of legal requirements. The Swedish Forest Agency claims that there is a viable population of the orchide in the area.		together with Skogsstyrelsen so that the Goodyera repens population will be considered. Further guidance can be read from the case that has been decided in the Land and Environment Court addressing one of the areas in the complaint: Nacka TR M 5551-21 Dom 2021-09-22. Verdict: "taking into account the relatively short distance between the findings of the species Goodyera repens made in the area reported for felling and the area east of this, the court assesses that the plants belong to the same population and the notified measures do not affect the main occurrence of the population, but only a few specimens. The notified measures are not considered to affect the species' conservation status in the area".  The species information was not available in Artportalen at logging planning stage, thus a deviation against standard requirements is not justified.	
Jun 23, 2021	CH	Local E- NGO	Sveaskog has felled nature value trees on a small felling site near the village of Stigsbo (Stjärnsund) in Hedemora municipality. It turned out that most of the pines on the wetland were very old but slow growing and relatively small. The annual rings of the youngest was about 110 years old. Four of the pines were over 200 years old when they were felled.	Closed	Pictures from the felling site after logging show the trees that have been left towards the lake. Trees that have been left as nature value trees are clearly coarser than other trees in the edge zone and represent the diameter that that forest had. The rest of the edge zone has smaller and slowly grown trees, some of which have been felled on the border to the logging. The auditor considers that the thinner trees cannot be considered to have clear characters of nature value trees such as flattened crown, crooked branches or clear characters of slowly grown trees. No evidence for a deviation is found.	Nov 15, 2021
Jun 28, 2021	СВ	Sámi village	The participatory planning process has not been offered to those Sami villages in	Closed	BV considers that the updated standard criteria 3.2. regulates that participatory planning process shall be	Nov 15, 2021

			Härjedalen that practice reindeer husbandry on land included in the Settlement Agreement (Förlikningsavtalet).		offered to all Sami villages in Sweden that have a legal or customary right to conduct Sami reindeer husbandry. NC03 is issued. Please see further arguments in the NC- report, chapter 7.	
Jun 28, 2021	СВ	Private person	Sveaskog has failed to comply with the FSC standard regarding the Högberget wind power plan project in Eret, Dalarna county. Sveaskog has not published information regarding the construction or given an opportunity for the local population to comment on the plans.	Closed	The project in question is in the initial phase. When interest in wind power is identified in a new area, the affected area is entered into Sveaskog's mapping tool on the website and is designated "Under investigation". The formal early dialogue begins with discussions with the municipality before any other stakeholders are contacted. The municipality has declared that it cannot take a position before they have had a review of the overall plan. Stakeholder consultations are started in case there is an interest on the part of the municipality to proceed. No contract with the wind power company can be signed before an environmental impact assessment and early dialogue has been conducted with the local population. The subject will be further monitored in the course of next audits. No deviation to standard requirement was found at this stage.	Nov 15, 2021
Aug 2, 2021	FSC	Sami reinde er herder	We report Sveaskog for violation of the FSC standard. This applies to two soil preparation sites made within our year-round grazing lands in Malå. Lichen lands and migration routes have been harrowed despite consultations.  Maximum 20% soil impact should be on lichen grounds – now it is 50-60%. One area prepared was near the reindeer paddoc and there is a migration route. Sveaskog spends a lot of time on consultation and we	Closed	The auditor has interviewed the reindeer herder and local staff at Sveaskog. The records and interviews confirm that a non-conformity is justified concerning inappropriate soil preparation method (NC05).	Nov 15, 2021

			had agreed verbally that it should be gentle soil preparation. The reindeer are dispersed in the area as it is difficult to access.			
Aug 9, 2021	СВ	Private person s	Sveaskog violates a number of criteria, when it turns out that many of the reported landscapes also include previously sold forests, which are obviously included in Sveaskog's nature conservation areas.  TV4Nyheterna reported earlier in the summer that Sveaskog includes sold land as nature conservation.  During a review of 45 landscape plans, just over 125 reserves were identified, which are today owned by the Swedish Environmental Protection Agency.  In a comment from the beginning of July 2021, Sveaskog admits that sold forests are included in the ecological landscape plans, which shows that the reporting of forests the company no longer owns is not only extensive but also takes place fully consciously.	Closed	Sveaskog has two public publications of nature conservation provisions. These are annual reports where the total area of these provisions is reported and a web map where the areas are shown at compartment level.  The source data is internally contained in the GISS system, which is updated after each forestry measure. The source data in GISS forms the basis for publication on the web map and annual report.  Correspondence between source data, web map and annual report has been reviewed by an independent auditing firm. The summary of this review is published on www.sveaskog.se  The conclusions from this review include that - Area acreage conservation plots in the annual report of "Almost 460,000 ha" correspond to the information in the internal register of 459,000 ha.  The account of the reserve that is not owned by Sveaskog in the web map was due to an incorrect parameter in the map view. This was corrected and then explained in a press release 2021-07.  There are no facts that indicate that Sveaskog deliberately publishes incorrect information about provisions.  The procedure for Sveaskog is to update information about	Nov 15, 2021

					ownership directly in GISS after a sale of a holding in order to avoid mistakes. Sometimes it can take several years before a sale is reported in the property register.  The public information in the ecological landscape plans in pdf format on sveaskog.se is partly out of date information as these documents are not updated yearly.  A non-conformity is established on indicator 6.8.1. (NC10).	
Aug 9, 2021	СВ	Private person	In some of Sveaskog's ecological landscapes, it is possible that the requirement for a certain proportion of older forest (6.8.3) is not met.  In several of the examined ecological landscapes, mainly in Götaland, all, or almost all, reported reserves are owned by the Swedish Environmental Protection Agency. Therefore, there is reason to suspect that Sveaskog in these provinces does not meet the requirement (6.8.3) for at least two percent older forests "calculated on the area of its own land holdings". These include the following ecological landscapes; Vallåsen-Oxhult, Hjärtsjö-Ringamåla, Västra Högsby, Eksjö and Ulrika-Mjölsefall.	Closed	A review of current registers in Oct 2021 shows that in 172 of 194 ecological landscapes there is at least 2% older forest. For the entire Sveaskog holding, the proportion of older forest is 10.7%. Older forests include older production stocks and older forest. For the landscapes that do not consist of 2% older forest, the plan is to set-aside areas of age so that they are eventually included in older forest. There are 21 such landscapes.  One landscape (Ösjön) lacks a plan. This ecological landscape will be phased out and the remaining holdings will eventually be included in Svartå landscape.  For the landscapes affected by the complaint, the numbers look as following: (First nr indicates allocated older forest % and second nr indicates planned older forest in the long run %): Eksjö 3.0, 6.2  Ulrika-Mjölsefall 1.3, 5.4  V Högsby 1.2, 10.6  Hjärtsjö-Ringamåla 1.6, 4.3  Vallåsen-Oxhult 4.8, 11.2  Requirements and guidelines for 6.8.3 in FSC-STD-SWE-03-2019 are thus met.	Nov 15, 2021

Aug 12, 2021	СВ	ENGO	Complaints have been filed on forests under logging threat that the complainants consider as key habitats on the basis of structures of the forest and redlisted species found in field inventories:  1. Guttuån  2. Nedre Sandåstjärnarna  3. Åsbobäcken  4. Furudal	Closed	Sveaskog has made a second nature value assessment and decided that the forest is worthy of protecting. This case is an example of incorrect NVA and part of Major non-conformity 01.  2. The planning was started in field by Sveaskog and some markings were placed in the forest, that the complainant interpreted as upcoming felling. There was anyhow no felling notification filed. Sveaskog discovered the nature values during planning and made the protection decision. No deviation found.  3. The auditor has asked The Forest Agency s expert to visit the site and the NVA states that the forest is production forest with some valuable parts, which have been considered in planning of the logging. No deviation found 4. The Forest Agency has stated that the red-listed fungi found in this sandy pine forest can be considered in the logging by leaving plenty of seed trees.	Nov 15, 2021
Aug 22, 2021	FSC	Sami reinde er herder and Interna tional ENGO	Complaints from Gällivare forest Sami village. The complaint has four parts.  1. Sveaskog's contractor runs through a reindeer herder's feeding on 23 February 2021 and runs over each feeding manger, over 10 pcs. Earlier in the winter, the road has been plowed about ten times without any crib being driven over. Those that are built of wood break down, a police report is made but closed down. Sveaskog refuses to replace the broken cribs.  2 Sveaskog is notified after the Sami village	Closed	The auditor interviewed the reindeer herder and planned a site visit that was cancelled as the road to the forest was not passable because of heavy snowfall. Nonconformity number 7 has been issued connected to the complaint part 4.  1. There was no verbal or written agreement between the parties concerning the feeding throats ("foderkrubba"). It is not allowed for anyone to leave objects on a private road. It is also not customary to leave feeding throughs on the road. The throughs were covered by snow and not visible to the driver when the road was cleaned. The possible police case was put down and the auditor considers that a nonconformity concerning egal	Nov 15, 2021

- received information about the new FSC standard that an area (Riktidockas, Överkalix municipality) the Sami village said no to felling only after field inspection which then Sveaskog got yes to felling by a new green representative of the Sami village changed to a no to felling when new information emerged about the area when we compiled GPS positions in the area and had external inventories in the area. Sveaskog plans to harvest this now. Two attached photos.
- 3 During the winter, Sveaskog dug ditches and excavated cold springs in a Natural 2000 area which we use as our water supply in reindeer husbandry work, the area is located between Karkjärv and Marsjärv Överkalix municipality.
- 4. A permanent reindeer husbandry facility at Snöhuvudet (30 km north of Niemisel Boden municipality) was run over at many places during thinning in the area in 2013. The Sami village requests a fence for repair of the broken fence about 100m. Sveaskog refuses to replace the Sami village but admits that it is their contractor's fault. This is a few years ago and has been addressed in every consultation meeting since then.

- compliance is not justified with evidences.
- The logging has been agreed on in a participatory planning meeting in 2020 and consideration in the form of prescribed burning was agreed on and documented. The logging was stopped by activists and forest machines were sabotaged. The auditor has seen evidence of a sms sent by the complainant to the certificate holder in advance to the logging saying that the logging should be stopped because of new information that they have received concerning nature values. The circumstances do not give clear arguments for a non-conformity however as the process for participatory planning has been followed and actions taken according that agreement.
- 3. The site referred to is not a ditch, but a measure to combat swell ice. The complaint has been reviewed by the County Administrative Board and they have decided to close the case without taking any further measures. No deviation found.
- 4. Please, see details of the non-conformity number 7 has been issued.

Aug 26, 2021	СН	ENGO	Skrattarberget in Sorsele municipality, Västerbotten county. Sorsele non-profit forest group performs random nature value inventories on dubious felling reports – the three objects are valuable forests that should not be felled.	Closed	One of the objects has been felled as early as 2016. One concerns road construction that the Forest Agency did not comment on, which began in 2016 and has since been reassessed for natural value and stopped by Sveaskog. The last object is set aside in the current position. The forests are part of the County Administrative Board's layer for forests that can potentially be included in a natural reserve or biotope protection. Sveaskog has been in contact with County Administrative Board and they have released the area for forestry operations. No deviation can be established as the area logged is difficult to evaluate and judge with certainty retroactively.	Nov 15, 2021
Aug 30, 2021	СН	ENGO	Complaints regarding harvest plans for a pine swamp east of Lake Göten in Oskarshamn municipality.	Closed	Bureau Veritas has visited the area in 2020 within the audit and does not consider that there is a demonstrable risk that watercourses will be affected as Sveaskog planned water protection measures. Maintenance ditching is not planned. The ditched peatland is productive forest and there are plenty of protected pine mosses in the landscape. A deviation from the FSC standard is not justified.	Nov 15, 2021
Aug 31, 2021	СВ	Interna tional E- NGO and Sámi village	Muonio Sami village has for centuries conducted a forest Sami reindeer herding on the same land for an uninterrupted time by the same family. This has previously been respected by Sveaskog. Before the 1928 reindeer husbandry law, Muonio Sami village was also classified as a forest Sami village. In the definition of indigenous peoples, which in turn is based on the UN's approach, it is stated, among other things,	Open	There is a complaint field to FSC International that has been given by FSC Int. to BV to investigate. Muonio is a concession Sámi village according to law and P3 does not apply to them according to Swedish FM standard. A request for interpretation has been sent to FSC Sweden by BV in order to clarify if FPIC shall be applied to Muonio regardless of the standard wordings that leave little room for interpretation. BV is awaiting answer from FSC Sweden/ FSC International. A meeting between Muonio Sami village, SSR, the ENGO and BV was held during the	Nov 15, 2021

			that the individual perceives himself as part of an indigenous people and is accepted as a member of the group. Self-identification of indigenous peoples' status is a fundamental aspect of the FPIC concept and part of the FSC. We consider ourselves a forest Sami village and as individuals as forest Sami, this approach is also supported by SSR and the Sami Parliament. Regardless of the current classification as a concession Sami village, we believe that we should be treated according to principle 3 on indigenous peoples' rights. That Sveaskog does not take this into account and no longer consults with us in accordance with the participatory planning process, we consider to be a violation of FSC's rules.		audit. BV will take the actions according to the FSC final position.	
Aug 31, 2021	СН	ENGO	Trial area for needs-adapted fertilization/ untested methods, Undersvik, Gävleborg county. The complaint has two parts: 1. The Forest Agency's regulations and advice must be followed (Forest Conservation Act from 2017). In fertilization activities, Ind. 10.6.1.  2. Sveaskog's BAG trial does not fall under 10.5.4a regarding untested methods. Sveaskog claims in its' response that the signed 10-year agreement with researchers means that the experiment	Closed	BV does not consider that unproven methods can be audited against indicator 10.6.1. whereas they should be audited against 10.5.4. a). The trial is a scientific cooperation project in a traditional setting where a new method is tested on the lands of Sveaskog under the scientific supervision of Linnaéus University and in cooperation with SLU and Skogsfors. The project is designed in cooperation withand approved by The Forest Agency. The results will be openly distributed to the forest sector by the research organizations. Sveaskog is responsible for permissions and contact with authorities, practical fertilization activities and collecting of water and	Nov 15, 2021

			falls under 10.5.4a in the Swedish FSC standard and that the handling has thus taken place in line with the standard's requirements.  10.5.4 When untested methods and materials are used, the following applies: a) FSC certified land can be used for research that is conducted by universities, colleges, research institutions, or national authorities.  WWF and BirdLife dispute this claim. Based on Sveaskog's answers and information from Skogforsk, it is clear that the land cannot be regarded as having been made available for research under the auspices of someone.		soil samples whereas Linnaeus University is responsible for the scientific activities together with other organizations, including analysis of the samples and publication of results.  The overall description of the project can be found on https://www.skogforsk.se/kun skap/projekt/adaptivt- skogsbruk/behovsanpassad- godsling/tidslinje/  The mentioned trials are found compliant with the indicator 10.5.4.	
Sep 18, 2021	СВ	Local	Naturskyddsföreninge n Hofors-Torsåker files a complaint: Hofors-Torsåker files a complaint: Request for reconsideration of felling permit at Lundertjärnsbäcken, N Lundertjärn, Hofors municipality. We have identified an older swamp forest which is a biotope that requires consideration according to the Swedish Forest Agency's target images for good environmental consideration. The swamp forest also belongs to the forest types that are less common in the landscape according to Principle 6.1.2 in the FSC standard. The forest corresponds to a type of biotope which,	Closed	The auditor engaged an expert from The Forest Agency to perform a nature value assessment. The assessment states; on the basis of the structures, elements and species found in the area, the forest will not reach a key habitat character. The forest is not a swamp but a moist uneven aged forest with little dead wood. An adapted felling is possible where, the bird of prey nest, the moister parts and the old trees are taken into account in logging planning. No deviation was identified.	Nov 15, 2021

			according to Principle 6.4.1a, with an interpretation from the regional perspective, should be excluded from all forestry measures			
Oct 14, 2021	FSC	Private person s	The forest at Knäberget on Sveaskog's land Storuman municipality that has been notified for felling is contrary to the FSC standard because it largely holds key biotope class. Since the previous felling, a large amount of storm-felled trees have been added which further raises the natural values in the area. During field visits, a quick review found several red-listed species and signal species.	Closed	The felling notification has been withdrawn as a consequence of the complaint, the area is protected because of high nature values and thus it can be concluded that Sveaskog has failed in performing a correct nature value assessment and the case is part of the major NC01.	Nov 15, 2021
Oct 22, 2021	СВ	E- NGO and Sámi village	Complaints based on Sveaskog's lack of compliance with current FSC standard principle 3. At this year's consultation with Maskaure Sami village, Sveaskog began the consultation by presenting the company's own, new "Code of Conduct for participatory planning which the Sami village was asked to sign. Sveaskog is well aware that more detailed guidelines for how the co-planning process (indicator 3.2.2 - 3.2.3) is to be carried out are currently being developed in a working group where SSR and certified forestry are represented. This is a job that is not finished yet. Sveaskog has	Closed	The auditor has discussed the situation with the representative of Maskaure Sámi village. 1. The auditor considers that the proposal for a mutual Code of conduct drafted by Sveaskog is a constructive document that is in line with the standard recommendation in 3.2.3. Nevertheless, the nonconformity NC06 has been raised on the fact that the planning process has not always been carried out in good faith with the Sámi. The participatory planning process needs to be executed by a certified company regardless of any additional Guidelines that are under preparation between the parties.  2. This year is the first year when the new participatory planning process is conducted according to the new standard requirements and 5-7 years of logging plans are discussed with the	Nov 15, 2021

			arbitrarily preceded this process by making its own document which it has asked the Sami village to sign. At this year's consultation, Sveaskog returned for the third time to the continuity forest at Siebdniesjavrrie and Gijmiesgielas. By returning with the same areas within such a short time, the company does not respect that the Sami village's no is a no. This violates the requirement for joint planning in a "good faith" (indicator 3.2.3.) And does not take into account that the Sami village has not previously consented to the felling of the forests in question (violates indicator 3.2.4). Sveaskog has had an obvious purpose to fell the two natural forests, both of which have high natural values. A new road has been drawn through the natural forest at Gijmiesgielas. (The same road goes 2 km before Gijmiesgielas through the Siebdniesjavrrie forest). Gijmiesgielas has already 2019 felling planned / cut. In addition, Sveaskog has consulted on both forests for three years in a row.		reindeer herders. Sveaskog has decided to include all forests that could be subject to any management activities in the new planning process in order to get a full overview of the Sámi representatives views. The auditor does not see that the process violates standard requirements as the Sami have the full right to give their consent or disagree to proposed activities.  3. Gijmiesgielas-case has been handled and closed in the Complementary audit 8.2021 (see answer in report). The forest has been visited by The Forest Agency and is production forest where consideration shall be taken in certain parts. Sidbniesjavrrie is handled in the below dedicated complaint.	
Oct 26, 2021	СВ	E- NGO and Sámi village	Maskaure Sami village in Norrbotten has in consultations 2019-2020-2021 said clear no to Sveaskog to fell the natural forest /	Closed	Sibdniesjavrrie has not been assessed for nature values and has not been reported for fellings because of the fact that the Sámi have not given consent to loggings. It is an	Nov 15, 2021

			continuity forest at Siebdniesjavrrie. The forest is located within the reindeer grazing area of the Sami village, contains hanging lichens and maintains high natural values. The company's actions indicate remarkable shortcomings in Sveaskog's natural value assessments (6.2.1). In view of the reported high nature values that appear from our letters, the forest should not be production forests, but should be included among the forests that Sveaskog voluntarily protects in order to meet the indicator (6.5.1. And 6.5.2).		area of about 200 hectares. BV has asked the Swedish Forest Agency to make an overall assessment of the nature values. The Swedish Forest Agency states that most part of the area is production forest. There are two swampy areas and one stony area containing dead wood that are to be set aside. No NC can be identified.	
Nov 4, 2021	СВ	ENGO	Felling reports A 39487-2020 and A 42288-2021 on Sveaskog land in Pajala municipality meet the Forest Agency's forest sector goals for "Older hanging lichen rich deciduous forest" and should be excluded from felling. The complaint concerns the implementation of: DIRECTIVES 6.4.5: The forest sector goals for consideration- demanding habitats (Sw: målbilder för hänsynskrävande biotoper) are implemented in the monitoring, documentation, adaptation and application of forest management activities.	Closed	The Swedish Forest Agency's forest consultant has assessed the objects on the request of BV. Result: A39487-2020 is not a hanging lichen rich forest according to the forest sector goals. There are hanging lichen on basically every branch but it is not enough for "hanging lichen rich" forest. Hanging lichens on the trunks are sparse. The lichens are quite short. There is an area with more spruce, but not even there does the assessment come up to lichen rich forest.  A 42288-2021 is not typical oldgrowth. Here, however, there are significantly more hanging lichens. This can be called a hanging lichen-rich stand. Lichens are found on stems and branches, but it is not a biotope that requires to be set aside according to the target image "Older hanging lichen-rich forest". It should be noted that work is currently on-going to develop	Nov 15, 2021

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# 5. Corrective actions from previous audit

Non-conformity/ Observation raised from previous surveillance audit					
5.1 Finding No.	1. JLe 01	5.2 Due date	Oct 8, 2021		
5.3 Grading	Minor	5.4 Open/closed	Closed		
5.5 Standard	National or CB FM standard - NFSS	5.6 Clause	7.2.1.		
		•			

# 5.7 Requirement

FSC-STD-SWE-02-04-2010 Managers shall use systematic procedures, adapted to the size and conditions of the landholding, to regularly update management planning and documentation based on the results of monitoring, new information (from authorities, research, etc.), and changing environmental, social and economic conditions.

#### 5.8 Description of audit finding

The forest owner has not sufficiently taken into account information from the regional authority when planning management operations

#### Objective evidence:

Visit to logging sites: Sillre Materialvägen AE5255 and Sillre lilla AE5003, Jokkmokk municipality

AE5255 was felled and felling of AE5003 was started, but the County Administrative Board stopped it.

The County Administrative Board of Norrbotten has announced that the logging areas are located in the surveillance layer (Bevakningsskiktet) for areas with potentially high nature values that may be relevant in the formation of natural reserves.

This is a minor non-nonformity as the felling notifications on both sites were made in the normal order 6 weeks prior to start of the operation and the County Administrative Board has access to theses and an obligation to monitor fellings.

The procedures for collaboration within the County Administrative Board's surveillance layer in

Norrbotten has been well established and partly worked poorly. The procedures for collaboration are being revised in collaboration with the County Administrative Board

## 5.9 Corrective action taken by the auditee

During the autumn of 2020 and the spring of 2021, Sveaskog and the County Administrative Board of Norrbotten have had a series of meetings where the surveillance layer (bevakningsskiktet) has been in focus. The goals of the meetings have been to go through all the objects in the layer to identify Sveaskog and the County Administrative Board opinions about the objects.

Sveaskog has also reviewed objects that are to be prioritized for inventory during the field season 2021. When Sveaskog plans something within the layer, contact is made with the County Administrative Board before measures are implemented. The areas that were already planned and reported for felling have been stopped for felling or received approval from the County Administrative Board that these are approved for felling.

The work between Sveaskog and the County Administrative Board will continue during the autumn of 2021 and is intended to be completed in 2022.

# 5.10 CB's review to corrective actions

The corrective actions prove that Sveaskog and Länsstyrelsen in Norbotten have had an active contact concerning the surveillance layer and they are collaborating concerning the prioritizing and categorizing of areas that could be possible nature reserves in Norrbotten County. The process will continue as long as all objects are decided on, also in 2022 and common field inventories are planned for summer 2022.

Documentation to verify the corrective actions:

Examples of protocols from meetings between Sveaskog and County Board 2021-01-25, 2021-02-22, 2021-03-23.

Excel list containing paused objects, inventoried objects, released objects for logging. 83 fellings have been paused at this stage.

There were also verified loggings which were put on hold in the management planning system: e.g. Skravekltjärnen-Järnbäcken and Rautosel.

Non-conformity/ Observation raised from previous surveillance audit						
5.1 Finding No.	2 JLe 02	5.2 Due date	Oct 8, 2021			
5.3 Grading	Minor	5.4 Open/closed	Closed			
5.5 Standard	National or CB FM standard - NFSS	5.6 Clause	6.3.4\$			

#### 5.7 Requirement

FSC-STD-SWE-02-04-2010 Managers shall retain all snags, windthrows and other trees that have been dead for more than 1 year except when they:

- a) constitute a safety risk for forestry workers or for the general public within recreation areas,
- b) block up frequently used paths and roads.
- c) constitute small-dimension felling residues,
- d) constitute breeding substrate for pest insects in case there is a documented risk of mass propagation 20.

#### 5.8 Description of audit finding

Dead wood has not been retained during final felling

#### Objective evidence:

Visit to logging sites: Sillre Materialvägen AE5255 and Sillre lilla AE5003, Jokkmokk municipality Dead wood had been driven over on the harvested sites.

This is a minor deviation as the problem has only been discovered on the mentioned sites and there are procedures and good examples of preserving dead wood in fellings has been seen during field audits.

# 5.9 Corrective action taken by the auditee

Instructions for planning and felling have been updated and clarified regarding the handling of dead wood. In the planning instructions, there are clearer descriptions of how to protect dead wood in connection with planning, e.g. by marking as consideration areas or point consideration, or with felling turn or lift away pieces of dead wood.

To even more clearly follow up the handling of dead wood in a systematic way, Sveaskog has added a special focus area in its nature consideration inventory after completed markings. The nature consideration inventory is a nationwide inventory that the Swedish Forest Agency makes on behalf of Sveaskog.

Considerations for dead wood has been handled in trainings for staff and entrepreneurs during 202 and a plan is available to further implement it in coming field educations.

Dead wood management has also been a focus area in internal audit in 2021. Both in the areas of felling and soil preparation. As this year's internal audit is not yet fully completed, it is too early to draw any conclusions from the results.

Documentation: Instruction for planning and felling, training materials and evidence of trainings held.

## 5.10 CB's review to corrective actions

The corrective actions (clarified instructions, training and information and additional follow up measures) were analysed by the audit team and it was confirmed that these are implemented.

In addition the handling of dead wood was verified during the audit in 2021 at several felling sites and also after soil preparation, e.g. field visit to GD501531, D586806, D586805.

Non-conformity/ Observation raised from previous surveillance audit					
5.1 Finding No.	3 JLe 03	5.2 Due date	Oct 8, 2021		
5.3 Grading	Minor	5.4 Open/closed	Closed		
5.5 Standard	National or CB FM standard - NFSS	5.6 Clause	6.2.4		
5.7 Requirement					

FSC-STD-SWE-02-04-2010 Managers shall take demonstrable measures to protect occurrences of red-listed species (in accordance with 6.2.2) outside delimited woodland key habitats. These can be generic, including detailed consideration or care-demanding patches at felling, or specific such as small-scale measures or setting aside forest land for nature conservation purposes

# 5.8 Description of audit finding

The forest manager has not implemented demonstrable measures to protect the occurrence of redlisted species

Recently felled area and an area that was stopped by the County Administrative Board contained red-listed species. Part of an external complaint; visit to field with the biologist filing the complaint. Communication / e-mail from the County Administrative Board

Logging sites: Sillre Materialvägen AE5255 and Sillre lilla AE5003, Jokkmokk municipality

#### 5.9 Corrective action taken by the auditee

Today, red-listed species are shown incl. its threat category in GISS and during the autumn, more conservation species will also be retrieved from the species portal using a new API to be developed in autumn 2021.

Species shown from autumn 2021 are: red-listed species, protected species, Habitats Directive Annexes 4 and 2, priority birds, Birds Directive Annex 1, Species in Action Programs and Signal Species.

A basic working method is described in relevant instructions. Sveaskog is in the process of establishing an instruction more specifically dealing with nature conservation species that are more frequent in the field or complaints. Sveaskog has worked to identify these species during the year. A difficulty about species is that there is a lack of knowledge, consensus and clear guidelines from the authorities about what consideration or need a species actually has and requires. Sveaskog therefore contributes to research to increase knowledge and better interpret the species' needs and needs in the context.

The environmental and nature conservation specialists have attended a species training and as a next step area managers will also have the opportunity to take a species course.

Documentation: examples of the new species layer, latest consultation version Instructions for handling species, programs and compendium of species courses

Documentation: examples of the new species layer, latest consultation version Instructions for handling species, programs and compendium of species courses

#### 5.10 CB's review to corrective actions

The corrective actions gives proof that Sveaskog has taken demonstrable measures to improve the protection of occurrences of red-listed species outside delimited woodland key habitats.

The species layer, instructions, training material was verified during the audit.

Also the use of the species layer was verified during field visits; e.g. at AG2653, AE3800.

Non-conformity/ Observation raised from previous surveillance audit					
5.1 Finding No.	4 JLe05	5.2 Due date	Oct 8, 2021		

5.3 Grading	Minor	5.4 Open/closed	Closed
5.5 Standard	National or CB FM standard - NFSS	5.6 Clause	9.1.1

# 5.7 Requirement

FSC-STD-SWE-02-04-2010 Managers shall identify as High Conservation Value Forests (HCVF) in the Swedish context the following forest types: a) Forest areas of national interest and/or of ecognized nation-wide significance, with a concentration of key habitats and/or habitats for red-listed species outside defined key habitats (HCVF 1, HCVF 3); b) Subalpine forests at altitudes above the nature conservation boundary45, (HCVF2); c) Protective forests as defined by §15 Forest Act (HCVF 4); d) Forests within protection areas for sources of water supply (HCVF 4).

#### 5.8 Description of audit finding

The landowner has not defined forests of national interest and recognized nation-wide significance, according to the Swedish Environmental Protection Agency's definition as HCVF.

Objective evidence:

List of HCVF categories.

Justification for the grade:

This is a minor non-conformity as it is a question of classification and does not entail a risk that HCVF values would have been damaged as the forests of national interest and nation-wide significance are all in practice under protected status.

## 5.9 Corrective action taken by the auditee

Corrective Action: A new analysis of Sveaskog's HCV areas has been made where Sveaskog has, among other things, identified areas with a concentration of key biotopes and formally protected areas within the national interest for nature conservation.

The updated maps are be displayed on Sveaskogs external website.

Documentation: External website, GISS, excel sheet: HCV\_areas calculation

#### 5.10 CB's review to corrective actions

The corrective actions give proof that Sveaskog has identified the High Conservation Value Forests (HCVF) in the Swedish context for the relevant forest types.

The GISS database and excel sheet describing HCV\_areas were verified during the audit

Non-conformity/ Observation raised from previous surveillance audit						
5.1 Finding No.	5 FC 01 FM	5.2 Due date	Oct 8, 2021			
5.3 Grading	Minor	5.4 Open/closed	Closed			
5.5 Standard	National or CB FM standard - NFSS	5.6 Clause	6.4.1			

# 5.7 Requirement

FSC-STD-SWE-02-04-2010 No felling shall be carried out in areas set aside for nature conservation during the breeding season of birds.

# 5.8 Description of audit finding

NS cutting was performed during the breeding season of birds

#### Objective evidence:

NS stand are designated as protection category where management activities are required to maintain the nature values. In this case spruce was taken out to enhance the growth of oak. Felling performed on 2020-04-21. Felling directive Älgåsen. Object AD1060.

Field visit to department 0103.

Interviews with planning staff.

The issue was also raised by a stakeholder.

Justification for the grade: this is a minor non-conformity as the deviation has been observed once.

#### 5.9 Corrective action taken by the auditee

This criterion no longer exists in the new FSC standard. What is described in the new standard concerns times for felling and which is particularly relevant in nature conservation management is described in 6.4.5... "Measures in stratified deciduous forests are carried out outside the birds' breeding period". Birds breeding season are addressed in Sveaskog's instructions for nature conservation management.

Documentation: Instruction nature conservation management.

#### 5.10 CB's review to corrective actions

The instruction is in place and is confirmed through interviews with responsible staff for logging planning. Stratified forests or forests in the category NS visited during the audit were not logged during the breeding time for birds (e.g. D 399235).

Non-co	Non-conformity/gap raised from previous audit – Complementary audit 2021						
5.1 Finding No.	1 _complementary 2021	5.2 Due date	Jun 9, 2022				
5.3 Grading	Minor	5.4 Open/closed	Open				
5.5 Standard	National or CB FM standard - NFSS	5.6 Clause	6.5.3.				

#### 5.7 Requirement

## FSC-STD-SWE-02-04-2010

6.5.3. Managers shall implement procedures for avoiding damage caused by heavy machinery, including appropriate methodology and technology for transports across watercourses.

#### 5.8 Description of audit finding

Soil damage has not been avoided in one logging in Hedlandet nature reserve.

#### Objective evidence:

The damage has occurred on wet ground and in an area of importance to outdoor life. No direct runoff to water courses could be identified despite of the claim.

#### 5.9 Corrective action taken by the auditee

Non-conformities raised from previous audit – Complementary audit 2021						
5.1 Finding No.	2 _complementary 2021	5.2 Due date	Jun 9, 2022			
5.3 Grading	Minor	5.4 Open/closed	Closed			
5.5 Standard	National or CB FM standard - NFSS	5.6 Clause	7.3.1			

# 5.7 Requirement

# FSC-STD-SWE-02-04-2010

7.3.1S. Managers shall ensure that employees and contractors are adequately trained for their tasks, and that they are given the instructions and supervision necessary to ensure proper implementation of the management plan.

#### 5.8 Description of audit finding

Natural value assessments are made before forestry measures, but they do not always reach the correct classification. A number of cases have been discovered where the organization has failed to identify woodland key habitats.

The following areas examined by the Swedish Forest Agency on behalf of Bureau Veritas are woodland key habitats according to the 1995 year's methodology, but not recognized by Sveaskog

- Tellejokk/ Sillre lilla
- Vassbo southern part
- Karmotjärnarna northern part

Ängerån the eastern part is not assessed by the Forest Agency due to the fact that the area was already set aside. Anohow it was set aside by Sveaskog as a consequence of the complaint and is therefore considered to be part of the non-conformity.

A non-conformity is justified regarding the staff's competence when assessing forests with high nature values that are to be classified as key habitats according to the FSC standard.

This deviation applies to both the complaint with deregistration of WKH and the areas reported for felling. The deviation is classified as a minor deviation despite the fact that the cases are many, due to the fact that the nature value assessments made are relatively old. Some natural value assessments were made before the ongoing certification cycle and they no longer reflect the current situation. The three objects classified as deregistration of key habitats were assessed for nature values in 2015-2016. Sveaskog has received deviations regarding the problem of not recognizing key habitats after this - a minor non-conformity in 2020 (standard indicator 6.1.7.) And a major non-conformity in 2020 (standard indicator 6.2.1). Sveaskog has taken measures that have contributed to closing both non-conformities. All cases assessed in this audit of forests with logging notification filed that are demonstrably key habitats, ie. Karmotjärnarna, Södra Vassbo and östra Ängerån, have been assessed for nature values by Sveaskog before the major deviation was issued in 2020. This means that it is not reasonable to state that the problem would reoccur as the identified incorrect nature value assessments were made before corrective measures were taken by the certificate holder.

This minor non-conformity is closed and upgraded to a Major Non-conformity, as the issue has been found to prevail in Surveillance 3 audit.

# 5.9 Corrective action taken by the auditee

Click or tap here to enter text.

#### 5.10 CB's review to corrective actions

Major NC raised on that subject, please, see details in the next section of the report.

Non-co	Non-conformities raised from previous audit – Complementary audit 2021				
5.1 Finding No.	3 _complementary 2021	5.2 Due date	May 31, 2022		
5.3 Grading	Obs	5.4 Open/closed	Open		
5.5 Standard	National or CB FM standard - NFSS	5.6 Clause	2.2.2		

#### 5.7 Requirement

#### FSC-STD-SWE-02-04-2010

2.2.2S. Managers shall respect everyone's right to pick wild berries, mushrooms and flowers in the forest in line with Sweden's Right of Public Access.

# 5.8 Description of audit finding

The way and content of communication sent by (or on behalf of) certificate holder to the stakeholders regarding the current phase in planning of wind power establishment, is not always clear and consistent. The relevant information- if there is a contract established for the use of the area or not, has been subject to misunderstandings.

- Clear contact information of the landowner is not easily accessible. Instead, reference is made to the website, from where the information can be found, but this information is not included in the letter sent to stakeholders as well. <a href="https://www.sveaskog.se/om-sveaskog/var-verksamhet/vindkraft/">https://www.sveaskog.se/om-sveaskog/var-verksamhet/vindkraft/</a>

Review of the complaint concerning wind power establishment at Galmsjömyran.

# 5.9 Corrective action taken by the auditee

Click or tap here to enter text.

# 5.10 CB's review to corrective actions

BV has not yet inspected the corrective actions to this observation.

# 6. Observations \$

Clear and systematic presentation of the observations and considerations on which the certification decision is based at criterion level, including findings of both conformities and nonconformities.

6.1	6.2 Clause	6.3 Summary of findings
No.		for the criteria selected for evaluation in this audit
1.4	The Organization shall develop and implement measures, and/or shall engage with regulatory agencies, to systematically protect the Management Unit from unauthorized or illegal resource use, settlement and other illegal activities.	Potential illegal activities include illegal timber cutting, poaching, dumping of rubbish, use of off-road vehicles in unauthorized locations. Employees and contractors work in the areas and are continuously monitoring the property. No illegal or unauthorized activities were identified during the audit.  Procedures to notify relevant authorities was discussed during field visits Reports can come in as external viewpoints. Illegal activities are reported to police departments
1.6	The Organization shall identify, prevent and resolve disputes over issues of statutory or customary law, which can be settled out of court in a timely manner,through engagement with affected stakeholders	There are no legal disputes that relate to management activities, including customary law. There are ongoing consultations with sami villages related to reindeer herding. These consultations are not classified as legal disputes and described under principle 3. Interviews with local sustainability experts within Sveaskog during audit
2.3	The Organization shall implement health and safety practices to protect workers from occupational safety and health hazards. These practices shall, proportionate to scale, intensity and risk of management activities, meet or exceed the recommendations of the ILO Code of Practice on Safety and Health in Forestry Work.	In general, there is an established system for health and safety issues within the company as well as at the sub-contractors used for forestry operations. Contracts with contractors were reviewed during the audit.  Accidents and incidents at work are handled in the SKIA reporting system. Each manager is responsible for measures to handle and prevent measures.  A minor nonconformity was raised when interviewing a sub-contractor used for silvicultural service because Sveaskog had not ensured that documentation of incident reporting, registration of sick leave and risk assessments was available
3.1	The Organization shall identify the Indigenous Peoples that exist within the Management Unit or those that are affected by management activities. The Organization shall then, through engagement with these Indigenous Peoples, identify their rights of tenure, their rights of access to and use of forest resources and ecosystem services, their customary rights and legal rights and obligations, that apply within the Management Unit. The Organization shall also identify areas where these rights are contested.	The legal and customary rights of Sámi to use and manage their territories are recognized and respected. Engagement with 44 Sami villages (incl 8 concession Sami villages) yearly is undertaken. A number of complaints have been filed regarding indienous peoples' rights, that are addressed in the complaint table. One complaint addressed the question if Muonio Sami village should be given right to participatory planning according to FPIC regardless of the fact that they are classified as a consession Sami village by Swedish Law. This question is set to FSC Sweden to resolve.
3.2	The Organization shall recognize and uphold the legal and customary rights of Indigenous Peoples to maintain control over management activities within or related to the Management Unit to the extent necessary to protect their rights, resources and lands and territories. Delegation by Indigenous Peoples of control over management activities to third parties requires Free, Prior and Informed Consent.	Participatory planning or engagement meetings are undertaken yearly with 44 Sami villages (incl. 8 concession Sami villages). The new standard requires a more transparent and rigorous participatory planning procedure to be followed. For the purpose a co-planning a web-based tool has been developed where reindeer herding plans and forest management plans can be studied together, the consideration measures are documented and predictions on pasture development can be done years ahead. Loggings are not done without the prior formal consent of the Sami village. There are anyhow Sami villages where Sveaskop has not received permit to suggested logging plans and several complaints address a number of forests with high nature values that are claimed to be critically important for reindeer herding. Complaints also address the participatory planning procedures of Sveaskog and lack of compensation for harm caused to the reindeer herding facilities. Two non-conformities are issued.
3.3	In the event of delegation of control over management activities, a binding agreement between The Organization and the Indigenous Peoples shall be	Representatives for the Sami reindeer herding are given the opportunity: a) to consider single management activities that affect their legal or customary rights, through the participatory planning process, or b) to give general consent for a certain period, certain activities or certain areas

	concluded through Free, Prior and Informed Consent. The agreement shall define its duration, provisions for renegotiation, renewal, termination, economic conditions and other terms and conditions. The agreement shall make provision for monitoring by Indigenous Peoples of The Organization's compliance with its terms and conditions	Where general consent has been given for management activities, a binding agreement is concluded between the parties.
3.4	The Organization shall recognize and uphold the rights, customs and culture of Indigenous Peoples as defined in the United Nations Declaration on the Rights of Indigenous Peoples (2007) and ILO Convention 169 (1989).	The requirements in Criterion 3.4 are fulfilled by following this standard
3.5	The Organization, through engagement with Indigenous Peoples, shall identify sites which are of special cultural, ecological, economic, religious or spiritual significance and for which these Indigenous Peoples hold legal or customary rights. These sites shall be recognized by The Organization and their management, and/or protection shall be agreed through engagement with these Indigenous Peoples.	Sveaskog hostes ca 160 planning meetings yearly with over 40 Sami villages. For the purpose a participatory planning a web-based tool (has been developed where reindeer herding plans and forest management plans can be studied together. Sites of cultural, social, economic and ecological importance for the Sámi are marked in the tool and considered in planning of activities.
4.1	The Organization shall identify the local communities that exist within the Management Unit and those that are affected by management activities. The Organization shall then, through engagement with these local communities, identify their rights of tenure, their rights of access to and use of forest resources and ecosystem services, their customary rights and legal rights and obligations, that apply within the Management Unit.	Local communities that may be affected by forest management are identified prior to management activities. There are procedures how to identify and communicate with local communities. Legal rights to the land, as well as use rights and easements, are documented and respected.
4.2	The Organization shall recognize and uphold the legal and customary rights of local communities to maintain control over management activities within or related to the Management Unit to the extent necessary to protect their rights, resources, lands and territories. Delegation by local communities of control over management activities to third parties requires Free, Prior and Informed Consent.	The Right of Public Access (Sw: Allemansrätten) is respected, defended and cherished. Legal rights, use rights and easements are respected.
4.3	The Organization shall provide reasonable opportunities for employment, training and other services to local communities, contractors and suppliers proportionate to scale and intensity of its management activities.	Large part of the entrepreneurs are local and in case of foreign workforce training and good working conditions are secured. Entrepreneurs were interviewed in the audit and stated business contracts are long and the economy is on a sustainable basis with Sveaskog.
4.4	The Organization shall implement additional activities, through engagement with local communities, that contribute to their social and economic development, proportionate to the scale, intensity and socio-economic impact of its management activities.	Sveaskog contributes to society in many ways, e.g. in the Eco parks where tourism and nature trails are developed. Also  • through collaboration with schools  • giving local nature tourism businesses priority to leases,  • granting land for outdoor and sporting establishments, such as nature trails and resting places,  • a positive approach to local outdoor, sporting and cultural arrangements on the landholdings  • keeping roads open to the public

		facilitating for hunting activities     Evaluation of activities is done as part of yearly reviews
4.5	The Organization, through engagement with local communities, shall take action to identify, avoid and mitigate significant negative social, environmental and economic impacts of its management activities on affected communities. The action taken shall be proportionate to the scale, intensity and risk of those activities and negative impacts.	During the audit examples of engagement with local communities were observed where Sveaskog took action to identify, avoid and mitigate significant negative social, environmental and economic impacts of its management activities on affected communities.  There are challenges in some parts where the local community is very active to protect its' forests and where wind mill parks are planned to be built. Complaints address such cases. No non-conformity raised however.
4.6	The Organization, through engagement with local communities, shall have mechanisms for resolving grievances and providing fair compensation to local communities and individuals with regard to the impacts of management activities of The Organization.	The company has a database (FURA) with external Inquiries, opinions and complaints. They are handled systematically and mainly in a credible way in relation to the stakeholder.  A NC was issued on indicator 4.6.1 due to the fact that complaints have been received from Sami villages that the certificate holder has not voluntarily remedied damage that has occurred in connection with forestry measures. Infringements have in some cases been treated with delay and not in accordance with good practice.  There is a publicly available general description of how the organization handles opinions and complaints available on the intranet. This description does not include all the information all the information that need to be publicly available. Therefore a minor NC was issued on indicator 4.6.2
4.7	The Organization, through engagement with local communities, shall identify sites which are of special cultural, ecological, economic, religious or spiritual significance, and for which these local communities hold legal or customary rights.  These sites shall be recognized by The Organization, and their management and/or protection shall be agreed through engagement with these local communities.	This Criterion is met by the indicators under Criterion 4.5.
5.2	The Organization shall normally harvest products and services from the Management Unit at or below a level which can be permanently sustained	Based on gathered information, there is no evidence that Sveaskog violates principle 5.2.1 of the FSC National Forest Stewardship Standard (NFSS) of Sweden, i.e., "timber harvesting levels do not exceed the harvest level that can be permanently sustained in the landholding".
6.2	Prior to the start of site-disturbing activities, The Organization shall identify and assess the scale, intensity and risk of potential impacts of management activities on the identified environmental values.	A conservation value assessment (CVA) is conducted and documented as part of the site planning. Examples of conservation value assessment were identified on all visited sites related to regeneration felling, thinning and forest road construction. There are different procedures for south, mid and northern Sweden and separate procedures for purchasing and road construction.  The methodology for conservation value assessment was developed in
		cooperation with Swedish Forest Agency. There is a yearly evaluation in the autumn each year. Evidence of evaluation meetings was shown.  A major NC was issued where the overall analysis of non-conformitys that affect woodland key biotopes reported for felling or downgrading of these during the ongoing certification cycle indicates that there are shortcomings in the system of performing conservation value assessments that have not been effectively corrected.
6.3	The Organization shall identify and implement effective actions to prevent negative impacts of management activities on the environmental values, and to mitigate and repair those that occur, proportionate to the scale, intensity and risk of these impacts.	The common practice is that the measures that are needed to conserve or enhance prioritized conservation values and habitats are noted in GISS and thereafter transferred to the planning instruction. This procedure is working well and observed on several sites during the audit
6.4	The Organization shall protect rare species and threatened species and their habitats in the Management Unit through conservation zones,	Natural state uneven-aged, and stratified forests with an abundance of old/large trees and a high frequency of coarse dead woody debris in different stages of decomposition are identified through the conservation value assessment. These forests have index 1 (Naturskogsartade) in the

	protection areas, connectivity and/or (where necessary) other direct measures for their survival and viability. These measures shall be proportionate to the scale, intensity and risk of management activities and to the conservation status and ecological requirements of the rare and threatened species. The Organization shall take into account the geographic range and ecological requirements of rare and threatened species beyond the boundary of the Management Unit, when determining the measures to be taken inside the Management Unit.	CVA template.  Sveaskog has identified 116 804 hectares of key habitats which is 25,4% off all WKH identified in Sweden. They are exempted from all management activities.  Information about red listed species is obtained as part of the planning process and considered in the conservation value assessments.  There are examples in the internal FURA system of external complaints related to planned felling where red listed species are found. Sveaskog acts on these complaints and is in close contact with the Forest Agency in order to have correct guidance for species consideration when needed. The complaints are analysed in this report.
6.5	The Organization shall identify and protect representative sample areas of native ecosystems and/or restore them to more natural conditions. Where representative sample areas do not exist or are insufficient, The Organization shall restore a proportion of the Management Unit to more natural conditions. The size of the areas and the measures taken for their protection or restoration, including within plantations, shall be proportionate to the conservation status and value of the ecosystems at the landscape level, and the scale, intensity and risk of management activities.	Sveaskog has set aside a selection of the productive forest land area and exempted this area from measures other than management to maintain and promote natural biodiversity or biodiversity conditioned by traditional land use practices.  The area set aside (2021-09-07) covers 15,1 % of the productive forest land area. 460 129 ha of o total forest area of 3 042 947 ha. The source is GISS. This figure corresponds with the official declaration in the sustainability report for 2020 (460 000 ha)  The area set aside is based on forest conservation values, landscape representativeness and biodiversity. Eco parks and nature reserves are assured together with authorities.  The quality assurance of nature conservation values within reindeer herding areas is done after the selection of areas for consultations with the Sami villages. The result of the consultations is an agreed selection of sites allocated for harvesting. After this step assessment an assessment of conservation values are made on the selected sites prior to harvest and thereby ensuring areas are set aside. The reason for this approach is to be efficient and save resources. If the forests selected for consultation will not be accepted during the consultation Sveaskog will not spend resources on assuring the assessment of conservation values.
6.6	The Organization shall effectively maintain the continued existence of naturally occurring native species and genotypes, and prevent losses of biological diversity, especially through habitat management in the Management Unit. The Organization shall demonstrate that effective measures are in place to manage and control hunting, fishing, trapping and collecting.	Sveaskog is effectively maintaining the continued existence of naturally occurring native species and genotypes, and preventing losses of biological diversity through habitat management.  During the audit examples of all indicators were verified during field visits. Some complaints address shortcomings, but evidence for non-conformity was not found. Trees with high biodiversity values are retained and safeguarded in forest management. During regeneration felling, on average at least 10 trees per hectare are retained on the felled area. Additionally required consideration patches, buffer zones and structures such as dead wood is marked in field by the management planners and marked in the GISS system for the logging operators. Conservation values in consideration-demanding habitats are maintained or enhanced in conjunction with management activities.
6.10	Management Units containing plantations that were established on areas converted from natural forest after November 1994 shall not qualify for certification, except where: d) clear and sufficient evidence is provided that The Organization was not directly or indirectly responsible for the conversion, or e) the conversion affected a very limited portion of the area of the Management Unit and is producing clear, substantial, additional, secure long-term conservation benefits in the Management Unit.	The conversion of natural forest to plantations is limited so that the total area of plantations established after November 1994 constitutes a maximum of 5 % of the certified landholding.  3,20% of the forest area is exotic species The use of exotic species is carefully controlled and actively monitored to avoid adverse ecological impacts. Pinus contorta is not planted since many years back and there are procedures for managing stands with P. contorta.
7.6	The Organization shall, proportionate to scale, intensity and risk of management activities, proactively and transparently engage affected stakeholders in its management	See 4.5.2.

The Organization shall monitor and	
evaluate the environmental and social impacts of the activities carried out in the Management Unit, and changes in its environmental condition.	The established monitoring system has been implemented for many years. The result is reviewed by all levels of management. The results from 2020 was reviewed during the audit. In addition to the independent monitoring by the Swedish Forest Agency internal audits are carried out on a large selection of social and environmental aspects.
The Organization shall have and implement a tracking and tracing system proportionate to scale, intensity and risk of its management activities, for demonstrating the source and volume in proportion to projected output for each year, of all products from the Management Unit that are marketed as FSC certified.	Sveaskog has implemented a tracking and tracing system. All harvested volumes are registered and the source is always traceable to the loading site of the truck.  It can be demonstrated the source and volume in proportion to projected output for each year,
The Organization, through engagement with affected stakeholders, interested stakeholders and other means and sources, shall assess and record the presence and status of the following High Conservation Values in the Management Unit, proportionate to the scale, intensity and risk of impacts of management activities, and likelihood of the occurrence of the High Conservation Values:	In the GISS system all categories of HCV:s are identified  The areas in respective category is presented in this report section 2.52 - 55
The Organization shall demonstrate that periodic monitoring is carried out to assess changes in the status of High Conservation Values, and shall adapt its management strategies to ensure their effective protection. The monitoring shall be proportionate to the scale, intensity and risk of management activities, and shall include engagement with affected stakeholders, interested stakeholders and experts	The following monitoring is carried out a) Concentrations of Key Habitats (HCV 1 and 3) Within ecoparks: the inventory project Effekt 20, in which forest-dwelling birds and insects are inventoried in six ecoparks and four reference areas. The project is ongoing in 2009-2033. Other follow-up: Statistics on performed NS measures within HCV. Random checks on individual NS measures.  b) IFL, Mountain forest:(HCV 2) Proportion of nature conservation forest within IFL is monitored.  c) water protected areas. (HCV 4,5) Routines for non-conformity reporting. Inventory of Nature value Considerations; objects that coincide with category c  d) Ramsar and wetland. (HCV 1,2,3) Routines for non-conformity reporting. Inventory of Nature value Considerations; objects that coincide with category d  e) Water environments of particular national value(HCV 1,3) Routines for non-conformity reporting. Inventory of Nature value Considerations; objects that coincide with category e  f) Natura 2000, Nature and cultural reserves (HCV 1,2). Routines for non-conformity reporting. Inventory of Nature value Considerations; objects that coincide with category f  g) Sami cultural remains(HCV 5,6) Routines for non-conformity reporting. Management of cultural environments is followed up through our annual consideration inventory which is made on completed land preparation objects with a registered ancient or cultural relic.  h) Registered archaeological monuments and other cultural remains (HCV 6). Routines for non-conformity reporting. Management of cultural environments is followed up through our annual inventory of considerations (Hänsyn) which is made on completed land preparation objects with a registered ancient or cultural relic.  A minor NC was issued because There is no clear analysis of whether high conservation values have been damaged, preserved of enhanced
	The Organization shall have and implement a tracking and tracing system proportionate to scale, intensity and risk of its management activities, for demonstrating the source and volume in proportion to projected output for each year, of all products from the Management Unit that are marketed as FSC certified.  The Organization, through engagement with affected stakeholders, interested stakeholders, interested stakeholders and other means and sources, shall assess and record the presence and status of the following High Conservation Values in the Management Unit, proportionate to the scale, intensity and risk of impacts of management activities, and likelihood of the occurrence of the High Conservation Values:  The Organization shall demonstrate that periodic monitoring is carried out to assess changes in the status of High Conservation Values, and shall adapt its management strategies to ensure their effective protection. The monitoring shall be proportionate to the scale, intensity and risk of management activities, and shall include engagement with affected stakeholders, interested stakeholders

10.2	The Organization shall use species for regeneration that are ecologically well adapted to the site and to the management objectives. The Organization shall use native species and local genotypes for regeneration, unless there is clear and convincing justification for using others.	Native tree species are used for regeneration. Local and suitable genotypes are selected  At the time of the audit 58.6 % of productive forest land area in the nemoral zone has spruce. Plans to achieve 50% are in NS stands, Eco parks and transformation of tree species in production forests.
10.3	The Organization shall only use alien species when knowledge and/or experience have shown that any invasive impacts can be controlled and effective mitigation measures are in place	No plantations of Contorta are established There are no exotic tree species planted
10.6	The Organization shall minimize or avoid the use of fertilizers. When fertilizers are used, The Organization shall demonstrate that use is equally or more ecologically and economically beneficial than use of silvicultural systems that do not require fertilizers, and prevent, mitigate, and/or repair damage to environmental values, including soils.	The Swedish Forest Agency's provisions and guidelines for the Forestry Act (Sw: Skogsstyrelsens föreskrifter och allmänna råd till skogsvårdslagen) from 2017 are complied with during fertilization.  Buffer zones to water course was identified in field and compared to maps with marked Helicopter fertilizing traces.  More than 20 % of the fertilizable area is left unfertilized Fertilization is monitored for example by internal audits
10.7	The Organization shall use integrated pest management and silviculture systems which avoid, or aim at eliminating, the use of chemical pesticides. The Organization shall not use any chemical pesticides prohibited by FSC policy. When pesticides are used, The Organization shall prevent, mitigate, and/or repair damage to environmental values and human health.	Sveaskog is working according to the swedish forestry act §29 andf related provisions  Sveaskog is not using any pesticides in the forestry.  Nurseries are included in the organization but excluded from the FSC certificate. The nurseries use pesticides and are certified according to ISO 14001
10.10	The Organization shall manage infrastructural development, transport activities and silviculture so that water resources and soils are protected, and disturbance of and damage to rare and threatened species, habitats, ecosystems and landscape values are prevented, mitigated and/or repaired	Soil scarification and road constructions are carried out so that water resources and soils are protected,

# 7. Audit findings

Nonconformities / Observations raised from this audit					
Finding 1. Due date May 14, 2022 No.					
Grading	Major	Open / closed	Open		
Standard National or CB FM standard - NFSS Clause FSC-STD-SWE-03-2019 SW 6.2.1					

6.2.1 A conservation value assessment is conducted and documented as part of the site planning, generally when the ground is free from snow cover, prior to regeneration felling, final thinning and forest road construction.

DIRECTIVES 6.2.1 AND 6.2.2: To achieve sufficient consistency and a reliable result, the methodology for assessing conservation values shall be well structured and tested, and include appropriate instructions for application.

Description of audit finding

A number of felling reports have been withdrawn due to external complaints received by Sveaskog. Since spring 2021, several of the objects have been allocated within the new strategic program for protecting continuity forests in northwestern Sweden, which is positive., However, they were reported for felling and might have been felled without external activity. Such cases are Guttuån, Skiren and Knäberget. The felling notifications have been withdrawn before external audit and nature values have not been harmed.

20 complaints concerning forests that have been reported for felling, have been received by Bureau Veritas. Out of these, five cases have been assessed by the Swedish Forest Agency on request from BV. All five cases have proven to be correctly assessed by Sveaskog and are production forests. Three of the 20 complaints, Guttuån, Skiren and Knäberget have been set aside after external activity already before the external audit. This deviation concerns forests that Sveaskog has not assessed correctly, and which now will be set aside.

Please also see complaint management table for further information on the cases.

The overall analysis of deviations that affect woodland key biotopes reported for felling or downgrading of these during the ongoing certification cycle indicates that there are shortcomings in the system of performing conservation value assessments that have not been effectively corrected. The shortcomings discovered during the certification cycle are individual cases. They still indicate the risk of possible more cases of incorrect conservation value assessments, when the scope of Sveaskog's activities is taken into account. A major non-conformity is thus justified. This is not a typical system failure as there is regular calibration and training of personnel in place and the conservation value assessment system itself provides a good basis for identifying conservation values in accordance with the requirements of the FSC standard. The reason for the incorrect assessments is not obvious and the situation requires a thorough overall analysis by the organization.

# Corrective action taken by the auditee

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# CB's review to corrective actions

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Nonconformities / Observations raised from this audit				
Finding	2.	Due date	May 14, 2022	
No.				
Grading	Major	Open /	Open	
_		closed	·	
Standard	National or CB FM standard - NFSS	Clause	FSC-STD-SWE-03-2019 SW 2.5.1	
Requirement				

2.5.1 Workers have relevant and up-to-date competence required for the work assignment.

## Description of audit finding

Conservation value assessments are made before forestry measures, but they do not always reach the correct classification. A number of cases have been discovered where the organization has failed to identify woodland key habitats as presented in the Major NC nr 1.

Upgrading of the minor non-conformity regarding staff's competence from the complementary audit reported 24.8.2021 to a major non-conformity. There were several cases of incorrect nature value assessments discovered in last audit and as the issue has been going on for a long time the non-conformity is classified as major. Please see further details of the non-conformity on the same issue (indicator 7.3.1 of the previous FM standard for Sweden) that is presented in section 5 of the report.

#### Corrective action taken by the auditee

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#### CB's review to corrective actions

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Nonconformities / Observations raised from this audit				
Finding	3.	Due date	Nov 14, 2022	
No.				
Grading	Minor	Open /	Open	
		closed		
Standard	National or CB FM standard - NFSS	Clause	FSC-STD-SWE-03-2019 SW 3.2.2.	
Requirement				

# Requirement

3.2.2 Large forest owners: A participatory planning process is offered to the Sami villages whose legal or customary rights are affected by management activities planned within the landholding.

# Description of audit finding

The participatory planning process has not been offered to those Sami villages in Härjedalen that practice reindeer husbandry on land included in the Settlement Agreement and the Right of Use Agreement. The certificate holder has over the years conducted consultations with the Sami villages according to these agreements. BV considers that the updated standard Principle 3 and more precisely 3.2.2. which regulates that participatory planning shall be offered to all Sami villages in Sweden that have a legal or customary right to conduct Sami reindeer husbandry.

This is a minor deviation because the reason why participatory planning was not offered is partly because the standard is written in a way that allows for interpretation. Arguments have been used where it is referred to that the Right of Use Agreement between forest owner and Sami village contains clause 12 where it is stated that consultations do not need to be carried out in accordance with the requirements of the FSC standard. The agreement refers to the old FSC standard. BV audit team considers that the new FSC standard contains many changes in the consultation process compared with the old standard, implying that the certificate holder cannot fail to offer the opportunity to the Sami villages. The Sami in Härjedalen have a legal right to conduct Sami reindeer husbandry on the lands based on the two agreements. It is explicitly written in the standard that the Settlement Agreement in Härjedalen meets the requirements in 3.3.1. i.e. a) or b) can be chosen or a "participatory planning light" according to the current format of the Settlement Agreement and it does not contradict with the requirements of the standard. If the standard had meant to say that the Sami covered by the Settlement Agreement should not be allowed to co-plan, the standard would have been written in a format that clearly took a position on this in the main requirement 3.2.2.

# Corrective action taken by the auditee

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#### CB's review to corrective actions

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Nonconformities / Observations raised from this audit					
Finding	4.	Due date	Nov 14, 2022		
No.					
Grading	Minor	Open /	Open		
_		closed	·		
Standard National or CB FM standard - NFSS Clause FSC-STD-SWE-03-2019 SW 9.4.1.					
Requirement					

9.4.1 Large forest owners: Changes in areas with High Conservation Values and the effects of management activities on High Conservation Values are monitored. The extent of monitoring is adapted to the scale, intensity and risk of the management activities.

# Description of audit finding

There is no clear analysis of whether high conservation values have been damaged or preserved after measures in the vicinity of or in HCV areas. No indications of damages were found during the audit. This is a minor deviation because there are numerous examples of follow-up regarding several HCV categories, e.g. cultural HCV, SLU 20 Effect, the yearly follow-up of consideration areas etc.

# Corrective action taken by the auditee

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#### CB's review to corrective actions

Nonconformities / Observations raised from this audit				
Finding No.	5.	Due date	Nov 14, 2022	
Grading	Minor	Open /	Open	
		closed		

Standard	National or CB FM standard - NFSS	Clause	FSC-STD-SWE-03-2019 SW 10.10.1.
Requiremen	nt		

Requirement

10.10.1 Soil scarification is *adapted to the site* and is carried out using *best practice* to minimize the impact on soil.

# Description of audit finding

Soil preparation on Malå Sami village's land has caused problems for reindeer husbandry. Soil preparation that has not been <u>site-adapted (harvning)</u> has been discovered in one case on a lichen rich site, This is not against the agreed method officially, as the participatory planning document states "optional soil preparation method". Interviews with local management planner and Sami village representative confirm that the site preparation anyhow was too heavy for the site.

# Corrective action taken by the auditee

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#### CB's review to corrective actions

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Nonconformities / Observations raised from this audit				
Finding	6.	Due date	Nov 14, 2022	
No.				
Grading	Minor	Open /	Open	
_		closed	·	
Standard	National or CB FM standard - NFSS	Clause	FSC-STD-SWE-03-2019 SW 3.2.3.	
<b>D</b>	. 1			

# Requirement

3.2.3 Large forest owners: The participatory planning process is conducted <u>in good faith</u> with representatives of the Sami reindeer herding in order to secure the rights that are affected by the forest management.

# Description of audit finding

The procedures for planning of meetings and communication with affected communities have in some cases not worked appropriately.

The participatory planning process has not been carried out in good faith with a couple of Sami villages (e.g. Maskaure, Mausjaur and Västra Kikkejaure).

This was indicated in the testimony from Sami villages regarding non-constructive approach on the part of the landowner.

The deviation is classified as minor because the certificate holder has actively followed the standard's guidelines for participatory planning with the Sami villages on their lands in general. In the audit, several examples of appropriate communication and cooperation with the Sami villages was ascertained.

# Corrective action taken by the auditee

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## CB's review to corrective actions

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Nonconformities / Observations raised from this audit				
Finding	7.	Due date	Nov 14, 2022	
No.				
Grading	Minor	Open /	Open	
_		closed	·	
Standard	National or CB FM standard - NFSS	Clause	FSC-STD-SWE-03-2019 SW 4.6.1.	
Requiremen	nt			

- 4.6 The Organization, through engagement with local communities, shall have mechanisms for resolving grievances and <u>providing fair compensation</u> to local communities and individuals with regard to the impacts of management activities of *The Organization*.
- 4.6.1 Inquiries, opinions and *complaints* are handled *systematically* and in a credible way in relation to the *stakeholder*.

# Description of audit finding

Complaints have been received from Sami villages that the certificate holder has not voluntarily remedied damage that has occurred in connection with forestry measures. Infringements have in some cases been treated in a way that has not been sufficiently systematic and substantiated. Testimonies and interviews with reindeer herders:

- a complaint from Gällivare Sami village where damage has occurred to a herding fence in 2013. No compensatory measures were taken regarding the fence. The certificate holder meant that the damage was caused by a storm felling and the sami village claim it has been due to harvesting machine that removed the storm felled trees.
- a complaint from Västra Kikkejaure Sami village where a large stone was left on the moving path for reindeers, that caused problems to reindeer husbandry. The certificate holder repaired the damage to the moving path, but the Sami village considered the measures taken not sufficient.

This is a minor non-conformity as it is largely based on interviews with various parties and objective evidence in the form of images or other concrete evidence is not available (although requested). Since there is disagreement between the parties as to how it happened and one case is from the previous certification cycles, there is not enough objective evidence to establish a major discrepancy. Sites in Gällivare were planned to be visited in the field by the auditor, but due to heavy snowfall the days before, the roads were not passable and the situation in the field could not be audited.

Please, see the details of Bureau Veritas feedback regarding the other related subjects in the "Complaints" table of this report.

# Corrective action taken by the auditee

# CB's review to corrective actions

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Nonconformities / Observations raised from this audit					
Finding No.	8	Due date	November 14, 2022		
Grading	Minor	Open / closed	Open		
Standard	National or CB FM standard - NFSS	Clause	FSC-STD-SWE-03-2019 SW 4.6.2		
Requiremen	Requirement				

<sup>4.6.2</sup> There is a documented and publicly available general description of how the Organization handles opinions and complaints.

The directives in 4.6.1 states that

A systematic and credible management of complaints include:

- a) publicly available contact details for conveying inquiries, opinions and complaints to The Organization,
- b) confirmation of receipt and information about how and when the matter will be handled,
- c) that planned and implemented measures are communicated,
- d) that an internal timeframe is in place for handling and implementing b and c,
- e) that the communication method is adapted to the stakeholder.

## Description of audit finding

There is no documented overall description of how the certificate holder handles opinions and complaints according to the guidelines in 4.6.1 available to the public.

Available to the public is a description of how to receive and who receives. "Your complaints or comments about FSC" with contact information on various issues. For points b and c there is no description of handling.

The evidence is based on interviews, Sveaskogs actual handling of complaints and the official information presented at Sveskogs web site at the time of the audit

This is a minor nonconformity as there are clear contact details, reporting forms and a implemented procedure for handling opinions and complaints and the certificate holder actively answers to complaints and inquiries.

# Corrective action taken by the auditee

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#### CB's review to corrective actions

	Nonconformities / Observa	ations raised	from this audit
Finding No.	9	Due date	November 14, 2022
Grading	Minor	Open / closed	Open
Standard	National or CB FM standard - NFSS	Clause	FSC-STD-SWE-03-2019 SW 2.3.5
Requireme	nt		

2.3.5 Accidents and incidents at work are handled and prevented.

DIRECTIVES 2.3.5: Accidents and incidents at work are handled and prevented through the presence and documentation of:

- a) incident reporting,
- b) occupational injury reporting,
- c) registration of sick leave as a result of accidents,
- d) safety inspections and risk assessments,
- e) records of overtime where working hours are regulated.

The Organization is responsible for documentation of the above for their own staff, and that contract workers with employed staff can present such documentation.

# Description of audit finding

Sveaskog has not ensured that contract workers with employed staff can present documentation on

- a) incident reporting,
- b) occupational injury reporting,
- c) registration of sick leave as a result of accidents,
- d) safety inspections and risk assessments,
- e) records of overtime where working hours are regulated.

# Evidence are the following:

The contractor has carried out pre-commercial thinning for Sveaskog 2021

Interview with manager and supervisor of a contractor

Staff Records. The staff employed by the contractor is residing in Sweden.

This is a minor non-conformity as the evidence is found at one contractor. Overall five contractors were met/ interviewed/ checked during this audit.

# Corrective action taken by the auditee

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# CB's review to corrective actions

Nonconformities / Observations raised from this audit				
Finding No.	10	Due date	November 14, 2022	
Grading	Minor	Open / closed	Open	
Standard	National or CB FM standard - NFSS	Clause	FSC-STD-SWE-03-2019 SW 6.8.1	
Requiremen	nt			

6.8.1 Large Forest owners: A landscape ecology perspective is applied in planning, taking into account the spatial distribution of the landholding.

DIRECTIVES 6.8.1: An Ecological Landscape Plan is produced through the systematic collection of information and analysis in accordance with relevant indicators in the standard. Among other elements, the plan includes:

- a) the landscape division, with justification for the division,
- b) prioritization of set aside areas,
- c) objectives for conservation management measures and the restoration of biologically valuable forests.
- d) area of exotic tree species.

The Ecological Landscape Plan is documented and regularly updated, based on monitoring and evaluation as per Principle 8.

# Description of audit finding

Sveaskog's ecological landscape plans that are published on the website are not updated, considering the spatial distribution of the landholding.

Sveaskog's website has information on ecological landscape plans (ELP) in the form of maps and pdf descriptions for each ELP. The ELP:s contain information on, for example, the proportion of older forests and have not been updated since 2016/2017.

On https://www.sveaskog.se/vart-skogsbruk/vart-naturvardsarbete/ekologiska-landskapsplaner/Downloaded 2021-10-19 the following was stated: "The ecological landscape plans were produced in 2016/2017, which means that figures for different areas have not been updated since then. This also applies to the areas of nature reserves that are reported; this includes both the reserve that Sveaskog owns today but also the reserve that Sveaskog has previously sold. Therefore it is important to point out that the ecological landscape plans are a presentation material that cannot be used to calculate allocated total areas on Sveaskog's land "

Interview with Nature Conservation Manager

This is a minor nonconformity because Sveaskog's landscape planning consists of more than the published pdf documents. Updated information on set aside areas on own landholdings can be found in Sveaskog's internal system and is updated and correct. Much of the information in the published ecological landscape plans is still valid

# Corrective action taken by the auditee

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# CB's review to corrective actions

Nonconformities / Observations raised from this audit				
Finding No.	11	Due date	November 14, 2022	
Grading	Minor	Open / closed	Open	
Standard	National or CB FM standard - NFSS	Clause	FSC-STD-SWE-03-2019 SW 7.5.1	
Requiremen	Requirement			

7.5.1 A summary of the management plan, including maps and excluding confidential information, is made publicly available at no cost and in an easily accessible format.

# DIRECTIVES 7.5.1:

- 1. For forest owners with landholdings of more than 50 000 hectares of productive forest land, the following information is made available on a website. For forest owners with landholdings of between 5 000 to 50 000 hectares of productive forest land, the following information can be made available upon request, digitally or as a physical copy.
- A. An overall description of the Ecological Landscape Plan, as per 6.8.1, including:
- a) a map of landscapes, including set aside areas and Woodland Key Habitats,
- b) a description of how the landscape division is done,
- c) the size of the landscapes,
- d) areas prioritized for nature conservation within the landscapes, including considerations taken for High Conservation Values (HCVs)
- B. Objectives and outcomes within the landholding, regarding areas of:
- a) enhanced consideration, as per 6.5.2,
- b) continuous cover forestry, as per 6.5.2,
- c) proportion of older forest, as per 6.8.3,
- d) burned forest land, as per 6.8.4,
- e) forest land that has been converted to another land use, as well as compensatory nature conservation measures for this conversion, as per 6.9.1 and 6.9.2,
- f) plantations, as per 6.10.1.

More detailed information regarding specific Ecological Landscape Plans is provided upon request.

# Description of audit finding

Sveaskog does not have an updated description on the website of objectives and outcomes for areas within the land holding for several of the points under Guidelines 7.5.1 B, for example objectives and outcomes for continuous cover forestry, plantation forests and proportion of older forest

Sveaskog's ecological landscape plans that are published on the website are not updated, considering the spatial Sveaskog does not have an updated description on the website of target figures and outcomes for areas within the land holding for several of the points under Guidelines 7.5.1 B, for example targets and outcomes for continuity forestry, plantations and proportion of older forest

Evidence are at Sveskogs web site at the time of the audit https://www.sveaskog.se/vart-skogsbruk/vart-naturvardsarbete/ekologiska-landskapsplaner/ Downloaded 2021-10-19 Interview with Nature Conservation Manager

This is a minor nonconformity as parts of the required information are available on the website. During 2021 Sveaskog updated published information on land holdings and clarified that pdf files are not up outdated

A review of current registers Oct 2021 shows that in 172 of 194 ecological landscapes there is at least 2% older forest. For the entire Sveaskog landholding, the proportion of older forest is 10.7%. Older forests include older production stocks and set aside older forests. For the landscapes that do not consist of 2% older forest, the plans are to let forest in set-aside areas age so that this forest is eventually included in older forest.

#### Corrective action taken by the auditee

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# CB's review to corrective actions

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Nonconformities / Observations raised from this audit				
Finding No.	12	Due date	Nov 14, 2022	
Grading	Observation	Open /	Open	
		closed		
Standard	National or CB FM standard - NFSS	Clause	FSC-STD-SWE-03-2019 SW 8.1.1	
Requiremen	nt			

8.1.1 The management plan, policies and management objectives are monitored and

DIRECTIVES 8.1.1: Large forest owners monitor and evaluate the management plan, policies and management objectives in accordance with their management system.

# Description of audit finding

Internal monitoring of felling planning, which includes conservation value assessment, is done. It is unclear however whether the assessment is sufficiently detailed to capture important parts of the nature value assessment. It can also be questioned whether the frequency of the assessment is correct (1 assessment / planner / year in MO North and 2 assessments / planner / year in MO South). The standard requires in many places that the

The *forest sector goals* for consideration-demanding habitats (Sw: målbilder för hänsynskrävande biotoper) are implemented in the <u>monitoring</u>, documentation, adaptation and application of forest management activities.

This is an observation because there is a procedure for monitoring of nature value assessments and a checklist used for the purpose and the evaluations are conducted. Anyhow it is not entirely clear from this audit whether the checklist that is currently used actually guides the organization in sufficient extent to evaluate whether the consideration-demanding habitats Goals have been followed and whether structures and species included in the nature value assessment have been identified correctly in field by the planner.

Corrective action taken by the auditee

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## CB's review to corrective actions

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Nonconformities / Observations raised from this audit				
Finding	13	Due date	Nov 14, 2022	
No.				
Grading	Observation	Open /	Open	
_		closed	·	
Standard	National or CB FM standard - NFSS	Clause	FSC-STD-SWE-03-2019 SW 3.2.2.	
Poquiromor	ht		·	

3.2.2 Large forest owners: A participatory planning process is offered to the Sami villages whose legal or customary rights are affected by management activities planned within the landholding. DIRECTIVES 3.2.2: The participatory planning process is offered to Sami villages that are affected by planned management activities within the coming 5-7 years, provided that the Sami villages have described to the Organization how they use the land within the area defined according to 3.1.1. The description can be given digitally, verbally or through physical copies of maps.

The participatory planning process covers the following management activities within the Sami village:

- · regeneration felling,
- · continuous cover forestry in areas above the nature conservation boundary,
- the method for soil scarification,
- the choice of tree species,
- · prescribed burning,
- the use of exotic tree species,
- · fertilization.
- · road construction.

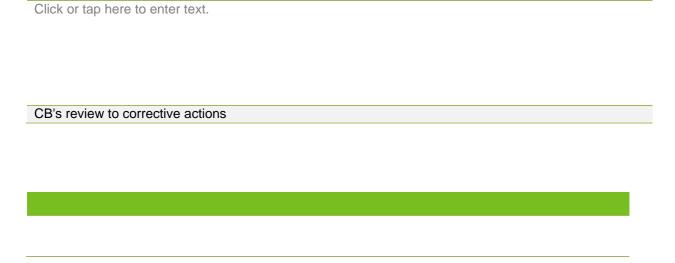
# Description of audit finding

It is to be observed how the consideration regarding the impacts of contorta pine (Pinus contorta) stands in the landscape of some Sami villages will be taken into account in participatory planning process. The areas with contorta are unusable as grazing land for reindeer husbandry and constitute an obstacle because the reindeer do not seek refuge there. Logging of some contorta stands could have a pronounced positive impact on the participatory planning process as they constitute a major individual factor in the landscape perspective.

Testimonies from Sami villages state that they wanted the contorta to be removed to a greater extent than the certificate holder has done already. The landowner arguments that it is not financially defensible to log the stands as they are still under lowest felling age.

Sveaskog has actively removed contorta and the stocks make up well below 5% in the landscape, which is the requirement of the FSC standard. Thus, this is an observation.

# Corrective action taken by the auditee



# 8. Certification decision

	Peer review(s)\$					
8.1 Review date	8.2 Peer reviewer	8.3 Peer reviewer expertise	8.4 Peer reviewer's comment			
Click or tap to enter a date.						

Note: Peer review is only applicable for main evaluation.

Certification decision	
8.5 Difficulties identified during the evaluation	The large amount of complaints and stakeholder concerns as well as different interpretations concerning the new FM standard (e.g. concerning P3 related to indigenous peoples rights) has made the evaluation challenging.
8.6 Conditions (corrections of minor non-conformities) or pre-conditions (corrections of major non-conformities) associated with the certification decision	The major non-conformities shall be corrected latest the 14th of May 2022. The timeline for corrections of the two major NC:s has been extended for 3 months due to COVID 19 force major situation and the natural conditions including snow-cover not allowing proper implementation of the corrective measures, especially in the Northern regions of the country. The minor NCs shall be corrected latest on the 14th of November 2022.  A follow up audit will be conducted in order to verify the closure of the major Non-conformities and the minor non-conformities raised in the Complementary audit 2021.
8.7 Auditor recommendation for the certificate holder's management system and performance	There is currently a huge pressure on Sveaskogs forest management from different stakeholders, that is reflected in the multiple complaints. The forest sector in Sweden is currently in a paradigm shift and the forest politics of Sweden will need to respond to the changed requirements of society. Regardless of numerous non-conformities raised, the lead auditor considers that the management system of Sveaskog is robust and driven by constant improvements.

	The lead auditor recommends the certificate to be maintained valid – subject to the timely correction of the Major non-conformities raised.
8.8 Certification decision	Maintain
8.9 Decision detail	Bureau Veritas Certification decides that FSC FM certificate of SVEASKOG FÖRVALTNINGS AB, Sweden, remains valid. There are two Major non-conformities to be closed before 14.05.2022. There were also raised 9 minor non-conformities which shall be addressed and closed before 14.11.2022 and one minor NC raised during the complementary audit, to be closed before 09.06.2022. The observation raised should also be considered by certificate holder.
8.10 Decision date	Feb 8, 2022
8.11 Decision making entity	FSC FM HUB of Bureau Veritas Certification

