



storaenso

**Mette Kahlin
McVeigh**
**Senior Vice President of
Public Affairs**

Stora Enso's Public Affairs Strategy



Be a constructive partner for national governments, the EU and global fora in reaching green goals, by ensuring we are knowledgeable, responsible and constructive in political and policy spheres.

By developing constructive solutions on how to develop green policies

An aerial photograph of a dense, green forest stretching towards a horizon under a bright blue sky with scattered white and grey clouds. The forest is composed of many small, individual trees, creating a textured green surface. The sky is a vibrant blue, with clouds of varying sizes and densities, some appearing soft and white, others more dark and dramatic. The overall scene is bright and clear, suggesting a sunny day.

We have a great responsibility to contribute to the EU's climate and biodiversity ambitions

- When designed right, forestry policy can enhance biodiversity and make forests more resilient to the impacts of climate change.
- A stable policy environment with a science-based approach to sustainable forest management is key.
- The EU Forest Strategy must continue to pave the way for the bioeconomy to enable the much-needed green transition.

Stora Enso consultation response to EU Forest Strategy



- As the Forest Strategy will build on the Biodiversity Strategy, it should set out clear definitions for the various concepts promoted in the Biodiversity Strategy. Noting that such definitions are not unproblematic to provide to begin with, they should, at minimum, allow for the forest products industry to contribute to the circular bioeconomy and the Green Deal's objectives – while recognising the importance of the substitution effect.
- Our recommended definitions are founded on the principle that ecosystem must be assessed on a landscape level. A forest landscape consists of many forest stands and hosts various ecosystems across those stands. In the Nordics, where approximately 70% of land is covered by forest, forest landscapes are vast areas, typically covering hundreds of thousands of hectares.

Continued I



- We propose that primary forests are defined as naturally regenerated forests of native tree species where there are no clearly visible indications of human activity; the area is large enough to maintain natural ecological processes, i.e., ecological processes and natural disturbances are not significantly restrained.
- We support the definition of the UN Convention on Biological Diversity (CBD) of old-growth forest stands as stands in primary forests that have developed the structures and species normally associated with old primary forest of that type. However, there is a need for locally adapted definitions since ecosystem successional processes leading towards old-growth forest are directed by abiotic and biotic site factors, e.g., climatic conditions, soil fertility and small-scale disturbances.

Continued II



We believe in science-based forest management. As such, close-to-nature forestry definitions need to reflect scientific advances. Definitions also need to account for local conditions and the specific ecological conditions and biodiversity present. In boreal Nordic forests practices that needs to be included in close-to-nature forestry are, for example, among others:

- Controlled burnings to promote disturbance-dependent species.
- Controlled soil disturbance (i.e., soil preparation) following harvesting via clear-felling to release nutrients for tree growth.
- Pre-commercial thinning and thinning to advance the natural process of intra-specific competition, i.e., promote growth of the most competitive trees.
- During harvesting create deadwood and leaving retention trees, both keys to preserve and promote biodiversity.
- During harvesting leaving tree buffer zones to protect watercourses, to provide habitats and prevent soil damage.
- Paying attention to the variation in forest structure to maintain species and habitat diversity by identifying and protecting ecologically and culturally valuable areas.

In defining close-to-nature forestry for the various ecological conditions throughout the EU forests, we propose that further work is initiated in the Standing Forestry Committee.

Continued III



- Stora Enso fully supports the Biodiversity Strategy targets. However, the concepts legally protected and strictly protected are interpreted and implemented differently by Member States today.

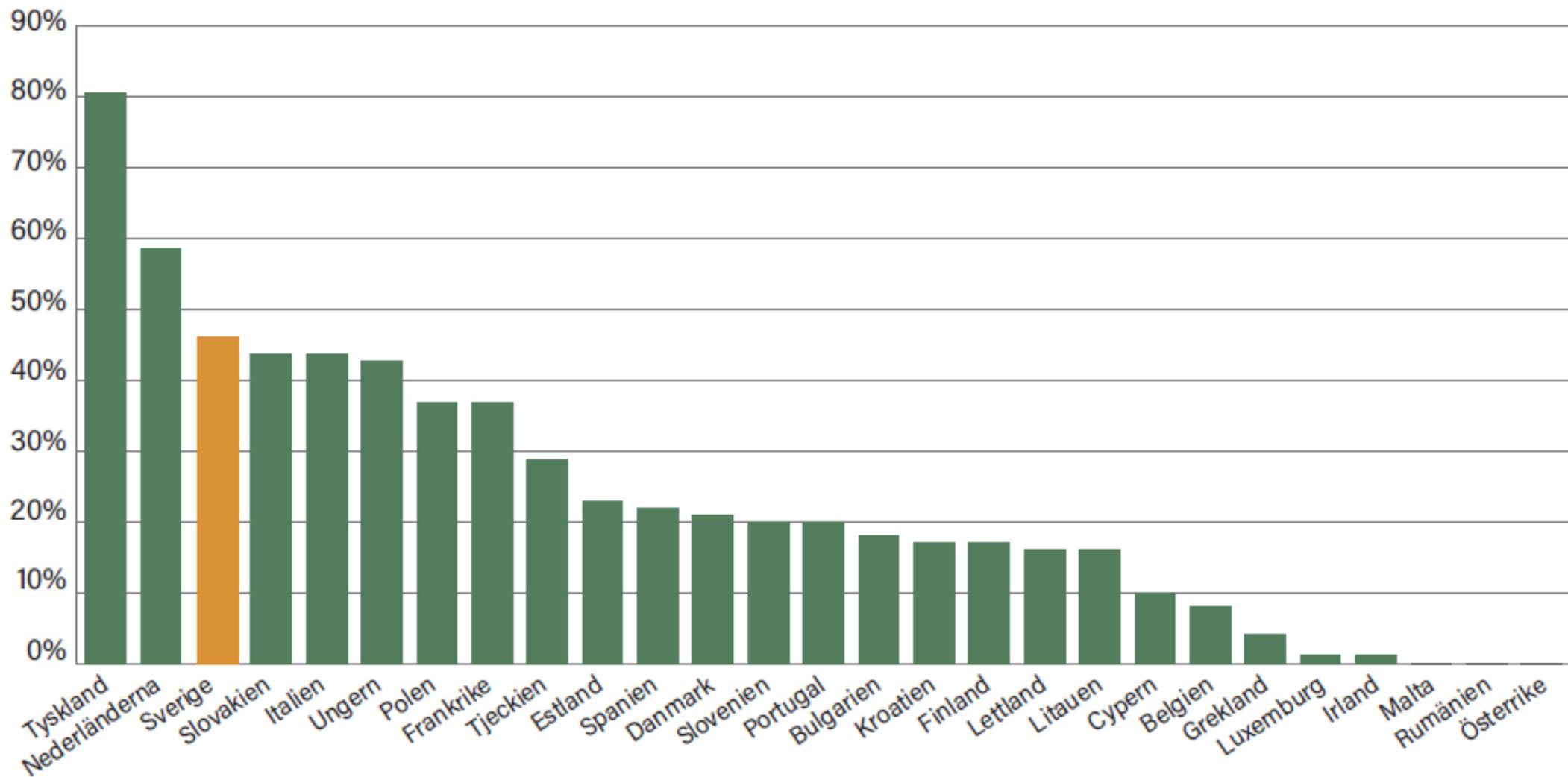


**Protected /
Strictly
protected**

**Currently being
developed**

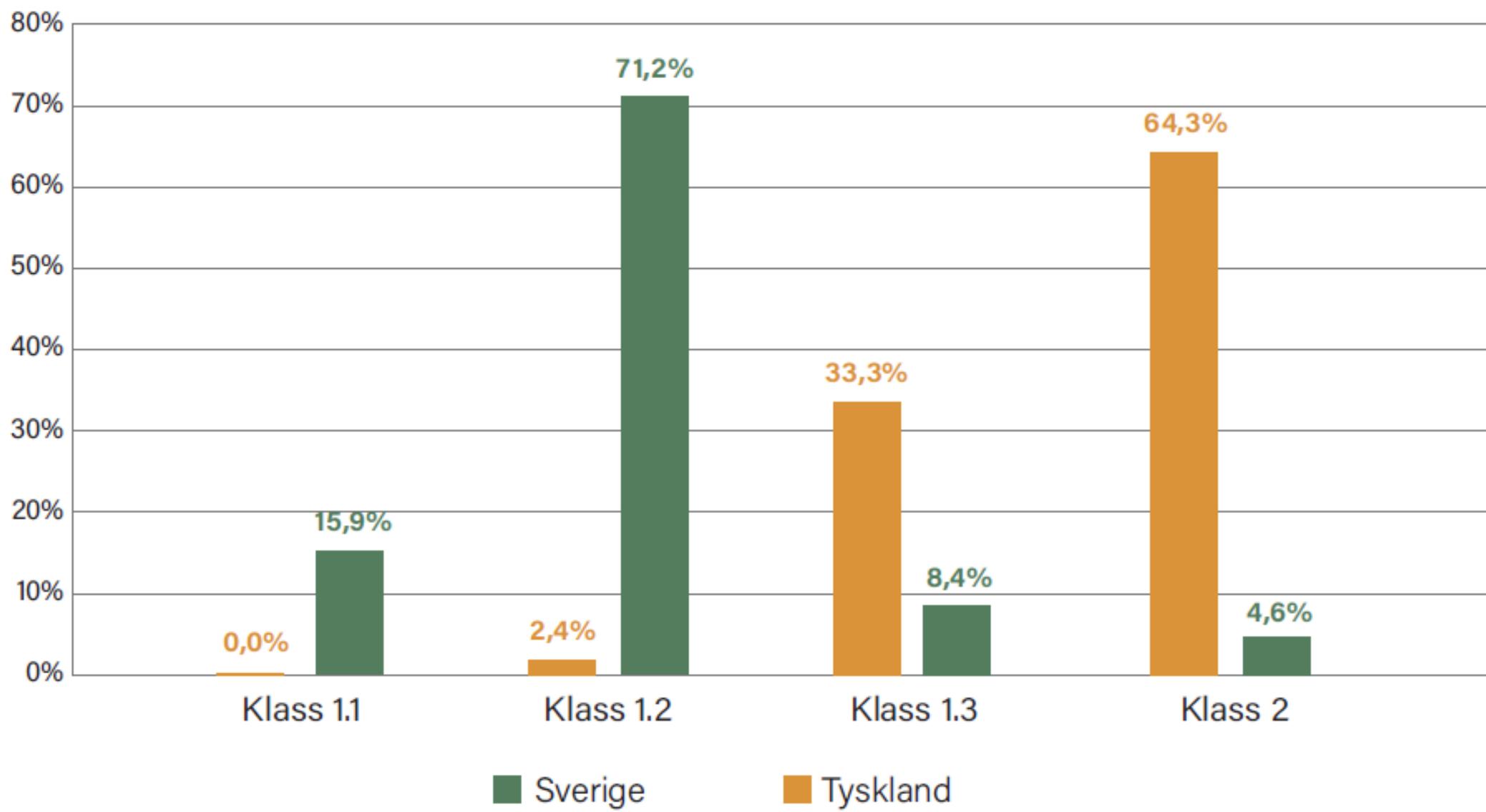


Om Sverige rapporterade likt Tyskland hamnar Sverige bland de länder som skyddar mest skog



Figur 4. Andel skyddad skog enligt Forest Europe kategori 1.1-2, om Sverige inkluderade strandskydd, skogliga impediment, hänsynsytor och frivilliga avsättningar.³⁰

Majoriteten av den skog som Tyskland rapporterar som skyddad finns i kategorier som tillåter mänsklig påverkan, Sverige skyddar majoriteten av skogen i de striktaste kategorierna



Slutsats



Denna jämförelse har visat att Sverige och Tyskland definierar skyddad natur på olika sätt. Sverige utmärker sig med en väldigt strikt tolkning för vad som anses vara skyddat. Majoriteten av naturen som redovisas som skyddad av Tyskland tillåter jord- och skogsbruk, medan Sverige främst redovisar skyddsformer där jord- och skogsbruk är förbjudet, eller strikt begränsat.

Skydd av biologisk mångfald är en viktig miljöfråga, men oavsett ambitionsnivå och vilket procentmål som väljs för skydd av skog och land måste rapporteringen utformas på ett sätt som möjliggör jämförelse mellan olika länder. En rimligare utgångspunkt i debatten kring det svenska skogsbruket vore att utgå från den officiella statistiken som visar att 26 procent av den svenska skogen inte brukas. Utifrån det kan man sedan diskutera konkreta mål med politiken som till syvende och sist ändå borde handla om det faktiska tillståndet ute i skog och mark.

Conclusion

- When designed right, forestry policy can enhance biodiversity and make forests more resilient to the impacts of climate change – while also ensuring that wood can be used to substitute for fossil-based products. This will lead to the best overall outcome and should be recognised in the new Forest Strategy.



Contact



Mette Kahlin McVeigh
SVP Public Affairs

0704736757

Mette.Kahlin.McVeigh@storaenso.com

THE RENEWABLE MATERIALS COMPANY