To consultative bodies

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Consultation proposal for a list of prohibited tree species in Nordic Ecolabelling's criteria

Nordic Ecolabelling hereby invites you to comment on the proposal for a list of prohibited species in the Nordic Swan Ecolabel criteria.

The proposed criteria have been prepared by representatives from the Nordic Ecolabelling offices under the leadership of Thomas Christensen. Please contact the Norwegian office if you wish to receive a hard copy of the documents and/or a list of the bodies consulted.

Nordic Ecolabelling's grounds for requirement to wood raw materials

Nordic Ecolabelling considers that the forest certification schemes FSC and PEFC are good tools for sustainable forestry and support these in the requirements for wood-based raw materials in Nordic Swan Ecolabelled products. Nordic Ecolabelling, however, also sees challenges with these schemes and in particular that the certification schemes allow logging in IFL (Intact Forest Landscapes) areas.

Nordic Ecolabelling is concerned with biodiversity and to set requirements that ensure the preservation of biodiversity. Protecting the earth's remaining IFL areas, as well as endangered species are central to this work. Many of these areas and species are in tropical areas, but also in boreal areas such as Russia. There are major challenges with illegal logging and high corruption in many of these areas, and the authorities' forest management and legislation can be weak.

Nordic Ecolabelling wants to apply the precautionary principle and reduce the risk that illegally harvested wood raw materials and wood raw materials from IFL areas are used in Nordic Swan Ecolabelled products. A list of tree species that are not allowed in Nordic Swan Ecolabelled products has therefore been prepared. The ban also applies to certified tree species. However, Nordic Ecolabelling has a belief that the FSC / PEFC systems and other initiatives and legislation are being developed so that the timber list can be shortened or removed in the long term.

History and process

Nordic Ecolabelling has had requirements for sustainable forest management since 1998. In previous versions of the forest requirements, requirements were set for traceability, that wood should be legally harvested and not from areas of high biological value or unclear ownership. In addition, there was a requirement that a certain proportion of the wood raw material should be certified according to forest standards Nordic Ecolabelling evaluated.

In 2015, Nordic Ecolabelling carried out a revision of the requirements for wood raw materials (requirements for forest) in the Nordic Swan Ecolabel criteria. The revision resulted in a number of changes, including that the forest certification schemes FSC / PEFC are approved on a general basis without the assessment of Nordic Ecolabelling. In the consultation proposal for new requirements, it was also proposed that wood raw materials from areas with high corruption risk (CPI under 40) could not be used without additional risk assessment carried out by Nordic Ecolabelling. Based on received consultation comments, the requirement that excluded wood raw material from areas with a high risk of corruption was replaced by a list of tree species not allowed in Nordic Swan Ecolabeled products. The list has, after the revision in 2015, been on consultation together with other

criteria in which wood raw material is included, but the possibility of commenting on the general basis for the list or species on the list has been limited, which has been criticized. Nordic Ecolabelling therefore now gives the opportunity to comment on the basis of the list and the species on it in connection with the ongoing revision of the tree list.
Based on received consultation comments, the final requirement will be adopted in the Nordic Ecolabelling Board in the autumn of 2019.

Species on the list

Species on the list are based on the IUCN's Red List and CITES in addition to species on Regnskogfondets (Rainforest Foundation Norway's) list of tropical tree species found in Norwegian building materials/products industry and furniture industry. There may be overlap between these sources so that the same tree species is on two or more lists. Nordic Ecolabelling has had a pragmatic approach to which species are on the list, as it is virtually impossible to create a complete list of species from IFL areas. This approach will therefore not cover all species from IFL areas, but will include those species that are mainly relevant in the Nordic market. Siberian larch is also on the list as this is a species that grows in boreal IFL areas and is used in the Nordic construction industry today.
Nordic Ecolabelling would like to have comments on which species are on the list, which species may be removed or which species that should be added.
Nordic Ecolabelling has also considered expanding the list further by including three species in the FSC Denmark's "Guide to lesser known timber species"[1] and would like to have feedback on whether these species are widespread in products on the Nordic market and should therefore be included.

Consultation documents

Nordic Ecolabelling submits the following documents for consultation:

- List of prohibited species in Nordic Ecolabelled products, draft version 2:
  An excel file showing the usual trade name, other trade names, Latin names, why the species is included (on the Rainforest Foundation Norway's list, IUCN or CITES), as well as what's new to current version 1
- Background document for the list that describes the reasons for the list and which species are included

We would very much appreciate your comments on the proposed revised tree list. The contact person in Norway is Eline Olsborg Hansen (phone +47 99 48 53 50) or eoh@svanemerket.no. We kindly ask you to send your comments to us no later than **April 26th 2019**, via the submission form on our website, by mail or by e-mail to post@svanemerket.no.

A summary of the consultation comments that are received will be available at Nordic Ecolabelling.

Best Regards,

Anita Winsnes
Managing Director

[1] https://www.lesserknowntimberspecies.com/species