



## Public Summary of the Final Complaint Investigation Report<sup>1</sup>

WWF Sweden vs. QMI-SAI at SAI-COC-010849 (Skogsägarna Mellanskog Ek För)

COMP-931

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Prepared by Assurance Services International GmbH

### 1. Introduction

In February 2023 WWF (the Complainant) (together with BirdLife Sweden and the Swedish Society for Nature Conservation) submitted a complaint to Mellanskog (the CH) concerning three harvesting sites situated close to each other in the same landscape. The Complainant stated that all three harvesting sites were unacceptable sources of wood from forests in which high conservation values were threatened by management activities (FSC Controlled Wood Category 3).

The complainants alleged that CH did not adhere to the FSC Controlled Wood requirements, that is FSC-STD-40-005 and the Centralized National Risk Assessment for Sweden FSC-CNRA-SE V1-0.

In February 2024, the CH responded to the complainants in the following way: The CH informed them that at that time they were revising their control measures. They were doing so because their previous version of the Due Diligence System (DDS) did not correctly interpret the geographical scope of the CW risk designations for CW Category 3 (HCV). At the same time, the CH rejected the accusations.

The Complainant escalated the complaint to the Conformity Assessment Body (CAB) in the same month.

In June 2024, the CAB concluded that the CH was in compliance with the FSC Controlled Wood requirements

The complainant did not agree with the CAB's response and submitted a complaint to ASI in September 2024 alleging that the CAB had failed to identify a non-conformity in their audits and investigation of their complaint.

### 2. Investigation Scope

The Investigation reviewed the performance of the CAB in relation to the following claims made by the Complainant(s):

- The CAB failed to correctly evaluate whether the CH's control measures mitigated the Specified Risk of sourcing wood from a harvest site "A 33076-2022" where high conservation values were threatened by management activities.

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<sup>1</sup>This template is applicable to all current and future ASI entities, including Assurance Services International GmbH, ASI North America PB LLC, ASI Asia Pacific Sdn. Bhd. and all their representatives and affiliates, hereafter collectively referred to as 'ASI'.

The normative references and requirements relevant to the investigation of this complaint include:

- FSC-STD-40-005-V3-1, specifically Section 4 - "Control Measures"
- FSC-CNRA-SE V1-0, specifically CW Category 3 "Wood from forests in which high conservation values are threatened by management activities"

### 3. Investigation Methods

The Assessment type selected for this investigation was a desk-based review investigation.

This included:

- Interviewing Complainant and CAB.
- Analysing geospatial data.
- Reviewing submitted documentation.

### 4. Investigation results

#### **Review of the control measures applied to areas with Specified Risk for HCV 2 in Sweden**

The CNRA for Sweden was developed according to PSU-PRO-10-002 V1-0 EN, and not in accordance with FSC-PRO-60-002 V3-0. The FSC Standard for Controlled Wood Evaluations (FSC-STD-40-005-V3-1 (clarifies that in such a case, special precautions are applied for the material originating from specified or unspecified risk source in relation to the HCV categories 2-6):

4.11 For material originating from areas not covered by an NRA approved according to FSC-PRO-60-002 V3-0, and where there is specified or unspecified risk related to high conservation values (HCVs) 2-6:

a) HCV 2 (Landscape-level ecosystems and mosaics): Material shall not originate from commercial logging in Intact Forest Landscapes\* (IFLs), and shall not originate from areas where management activities contribute to/increase the fragmentation of IFLs.

\*Determined according to <http://intactforests.org> or <http://www.globalforestwatch.org/map/3/15.00/27.00/ALL/grayscale/none/607> for the year 2013, or by an FSC risk assessment.

The CNRA for Sweden (3.2 HCV 2) provides a local geographical scope of HCV 2:

We defined areas of potential occurrence for HCV2 using the following proxies (Figure 4):

1. Alpine and Subalpine Forest Above Naturvårdsgränsen  
In line with the FSC national standard for Sweden, we consider all forest located at elevations above the montane conservation limit (Naturvårdsgränsen) to be HCV 2.
2. Tracts of Old Growth Larger Than 10,000 ha

A map of the Naturvårdsgränsen (Nature Conservation Boundary) is available on FSC Sweden's website in an ESRI shapefile format.

The harvest sites are located above the Naturvårdsgränsen, and the CNRA determines it as "Specified Risk" for the CW sub-category 3.2 - HCV 2. The CNRA does not define the mandatory control measures, however, it clarifies that the downgrading to "Low risk" happens when the "Operators [...] have effectively implemented procedures to avoid sourcing from forest above Naturvårdsgränsen or from IFLs". In the absence of the normative control measure as per FSC-PRO-60-002 V3-0, the requirement 4.11.a) prevails and repeatedly states that the certificate holders must



refrain from sourcing from HCV 2. Thus, it is established that the CH's decision to source the wood from A 33076-2022 within the scope of their CW certification goes against the FSC requirements.

## 5. Conclusions

This ASI complaint investigation found that all of the allegations of the Complaint were justified.

Therefore, this investigation recommended the following:

1. ASI should issue a nonconformity to the CAB against FSC-STD-20-011-V4-2, clause 6.17.a (requirement to verify the implementation of control measures).

This nonconformity was issued in the ASI Assessment following this Complaint investigation.

2. ASI should issue a nonconformity to the CAB against FSC-STD-20-001-V4-0, clause 1.9.10 (requirement to ensure complaint investigators were not involved in the evaluation related to the complaint).

This nonconformity was issued in the ASI Assessment following this Complaint investigation, but under another the normative requirement of FSC-STD-20-001-V4-0, clause 1.5.1 (impartiality).

3. ASI should issue a nonconformity to the CAB against FSC-STD-20-001-V4-0, clause 1.9.9.d (requirement to finalise complaint investigations within 3 months of receipt).

This nonconformity was issued in the ASI Assessment following this Complaint investigation.

4. ASI should request clarification or guidance from FSC about the implementation of HCV 2 requirements in Sweden.

ASI requested guidance from FSC on this matter. While they declined to issue normative guidance, they provided commentary that generally supported ASI's conclusions. ASI will continue to ask FSC for general guidance on this topic in Sweden.