

OPEN LETTER TO THE FINNISH GOVERNMENT TO PROMOTE THE PROTECTION OF PRIMARY AND OLD-GROWTH FORESTS IN LINE WITH NATIONAL CRITERIA

On September 5, 2023, researchers on forest biodiversity gathered to discuss the protection of state-owned forests in the context of the EU's biodiversity strategy and extensive inventory packages prepared by volunteers in Finland. The discussion highlighted the importance of inventory packages in achieving forest protection goals. These datasets represent the best information in our country about the quantity and location of unprotected primary and old-growth forests.

Kone Foundation organized a workshop for researchers with deep knowledge of Finnish forest biodiversity, forest ecology, and forest structural characteristics on September 5, 2023. The researchers were presented with the results of the “Luonnonmetsä” working group's mapping of primary and old-growth forests on state-owned lands, which have been funded by Kone Foundation. The Foundation has a new initiative, “Metsän puolella”, which aims to diversify the discussion on forests and their sustainable use.

The workshop also featured mapping data from a volunteer inventory group in indigenous Sámi Homeland areas in Northern Finland (Sápmi) and other publicly available mapping data from state-owned lands produced by Metsähallitus (state-owned forestry company) across the country. After familiarizing themselves with the datasets, the participants engaged in critical discussions regarding how the inventory packages and other shared information relate to the protection of primary and old-growth forests in Finland.

WHAT IS THE CONTEXT FOR THE DISCUSSIONS OF THE WORKSHOP?

With the United Nations Biodiversity Convention and the EU's Biodiversity Strategy, Finland has committed to a significant increase in protected areas on land and at sea. The goal is to have 10% of the area strictly protected and 30% under legal protection by 2030. According to the EU Biodiversity Strategy, protection needs to be targeted comprehensively at the regional level:

“The targets relate to the EU as a whole and could be broken down according to the EU biogeographical regions and sea basins or at a more local level. Every Member State will have to do its fair share of the effort based on objective ecological criteria, recognising that each country has a different quantity and quality of biodiversity.” ([EU biodiversity strategy 2020](#))

To achieve this goal and prevent the loss or degradation of the most valuable forests before 2030, it is advisable to start implementation immediately, relying on the best available expertise.

WHAT WAS DISCUSSED IN THE WORKSHOP?

In the workshop, experts primarily discussed two entities:

- 1) The mapping of state-owned forests in southern Finland, which was carried out by “Luonnonmetsä” working group from 2020 to 2023, funded by Kone Foundation.
- 2) The mapping and survey work by the “Luonnonmetsät Sápmi” working group, which examined unprotected forests in the Sápmi area.

HOW WAS THE WORK ADDRESSED IN THE WORKSHOP?

At the beginning, the workshop featured a presentation by **Kimmo Syrjänen**, Project Manager at the Finnish Environment Institute (Syke), who outlined the goals of Finland's biodiversity strategy and the national criteria work carried out by Syke and the Natural Resources Institute Finland (Luonnonvarakeskus). The work is based on an EU background document, which shares similar indicators to those used in Finland previously for the protection of old-growth forests. What is mainly new is the consideration of ecological protection zones, which is practically feasible in state multi-use forests.

The main focus of the workshop was on the presentations by **Risto Sulkava** (biologist, Ph.D.), regarding the results of the mapping conducted by the Luonnonmetsä working group, funded by Kone Foundation, and the presentations by **Jan Saijets** (Ph. D.) and a representative of the Sámi Parliament in the national EU Biodiversity Strategy Steering Group and a member of the National Forest Council, regarding the results of the mapping in the Sápmi area.

Both of these mappings focused on state-owned commercial forests outside of protected areas and land use planning areas. The mapping was conducted based on remote sensing data and field inventories. The fieldwork was targeted to areas that were chosen based on existing data (e.g., GIS data). Field surveys were extensive and identified the most significant biodiversity sites in state-owned forests outside of protected areas.

Most of Finland's primary and old-growth forests are located in the Sápmi region. Protecting the remaining forests supports not only EU and national protection goals but also the rights of indigenous peoples. The creators of both mapping packages expressed the hope that researchers would make use of the data.

The mapping presentations were commented on by three experienced researchers from various perspectives.

Timo Kuuluvainen (Docent, Emeritus lecturer of Forest Ecology) addressed the question from the perspective of natural forest characteristics and their connection to restoration: in most forest landscapes, the values of nature have been significantly simplified by extensive forest management, and it is essential to consider not only the protection of old forests but also the enhancement of nature values in other landscapes in various ways.

Raisa Mäkipää (Docent, Research Professor at the Natural Resources Institute Finland) examined the question from the perspective of criteria, economics, and politics. There is enough information in Finland to make decisions about protection. The supply of wood to the forest industry does not depend on these forests. From the perspective of the overall welfare of society, these forests are more valuable standing, as old forests offer opportunities for tourism, recreation, and carbon sequestration. In the Sápmi region, these forests are vital, especially for reindeer husbandry.

Aino Juslén (Ph.D., Head of the Natural Solutions Unit at the Finnish Environment Institute) emphasized the importance of research-based knowledge. In the development of Finland's national criteria, researchers from the Finnish Environment Institute and the Natural Resources Institute Finland have collaborated, drawing on extensive research-based knowledge. Giving specific numerical values for old-growth forests is impossible, yet society expects them. It is essential for the research community to collectively communicate what can be said based on research and what should be left for decision-makers. The precautionary principle should be taken into account in the implementation of forest protection, in line with the CBD and EU guidelines.

In addition to the commentaries, there was a lively discussion based on the following questions:

- 1) How do the hectares presented in the mapping packages relate to the protection goals that Finland has committed to? What is the scale of forest protection and the relation of various proposals to it? Metsähallitus' own sites cover approximately 100,000 hectares, the Luonnonmetsä working group's 60,000 hectares, and 300,000 hectares in the Sápmi region → less than the proposed additional protection of 630,000 hectares in the 2035 draft of the National Biodiversity Strategy, with over 500,000 hectares targeted to state multi-use forests.
- 2) How do the selected criteria, methods, and their application in the presented mapping work correspond to EU guidelines regarding forest areas that can be assumed to meet protection criteria anyway and should be protected immediately according to the precautionary principle?
- 3) How does the presented data relate to other data used in the preparation of the EU Biodiversity Strategy pledge?

- 4) The issue of protecting primary and old-growth forests in the Sápmi region: what is relevant and current when reconciling ecological, cultural, and land use goals in different land use categories while maximizing climate and nature benefits?

The discussion concluded that the overall challenge is to cost-effectively align land use and protection goals, with a focus on halting biodiversity loss and implementing international biodiversity agreements.

RESEARCHERS' OBSERVATIONS

- The results of the mapping presented in the workshop are significant. The size of the presented packages is well in line with what has been previously proposed in Finland regarding the need for additional forest protection.
- It is crucial to present the existing knowledge to decision-makers. The results of the mapping should not be disregarded when making decisions on the protection because they are the best field-verified dataset on unprotected forests with high conservation values in Finland.
- It is important not to make protection decisions based on criteria that are too stringent. For instance, in some primary forests, the age of the trees may not be high, but it has a forest structure resembling natural conditions and a significant amount of deadwood. In another location, the trees may be quite old, but there is less deadwood. The application of criteria is significantly influenced by the productivity of the forest. The (national conservation program) METSO program's criteria provide good guidelines for this and are worth taking advantage of. The inventory criteria in the presented mapping packages are suitable as a basis for protection decisions.
- It is also crucial to recognize that protecting the areas included in the presented mapping packages alone will not stop the ongoing biodiversity loss in Finland's forests. Many more actions are required.
- In Finland, systematic conservation planning has been carried out extensively, and various models have been developed which are worth utilizing. Protection must be targeted regionally and comprehensively to secure different forest habitat types and species. Unprotected old forests on state-owned lands are mainly located in northern and eastern Finland and the Suomenselkä region, so it is important to restore forests in other parts of Finland.
- Several presentations highlighted the importance of considering the precautionary principle. Protecting all the hectares presented in the mapping packages means no overprotection, but not protecting them violates the precautionary principle. Not protecting should be justified on a case-by-case basis, based on field visits, and documented well.
- In addition to the overall societal benefits of old-growth forests, the significance of old-growth forests in safeguarding carbon storages was highlighted. Protecting the proposed sites would support Finland's carbon neutrality targets.

- In the preparation of protection decisions, it is important to consider various forms of research, not just ecological research, as Finland has a wealth of diverse research available.
- Trust and cooperation need to be systematically built with researchers and Metsähallitus Forest Ltd. Openness and accessibility of data governed by Metsähallitus to researchers were seen as areas for improvement.
- In the Sápmi region, beyond the proposed protection of sites, a broader process should be initiated to reconcile the views and goals of various stakeholders in different land use categories while maximizing climate and nature benefits.

In summary, it can be stated that the mapping packages presented in the workshop are in terms of scale and criteria such that the protection of the natural forest sites and their buffer zones included in them should be promoted in Finland in any case in the coming years. Moreover, they are principally the type of forests for which immediate protection is recommended by the EU, based on the precautionary principle.

We, the undersigned, share these observations based on the workshop discussions described above.

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- Mapping of forests in the Sápmi area, Jan Saijets, Representative of the Sámi Parliament in the Forest Council, Tel. +358 40 7609 360
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