

# **Key Biotopes, Registration and Disputes in the Swedish Forest**

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**Key words:** Land Management, Forestry, Key Biotopes, Geospatial Data, Sweden.

## **SUMMARY**

The objective of this paper is to describe land use claims, conflicts of interests and legal processes concerning the Swedish forests and the registration of certain areas of high ecological value.

The Swedish Forest Agency has since the 1990s inventoried natural values in the forest and registered areas that constitute so-called Key Biotopes. These are areas which - from an overall assessment of the biotope's structure, species content, history and physical environment - have significant value for the forest's flora and fauna and where red list species are or can be expected to be present. This geospatial data has been accessible for multiple actors in the environmental and forestry sectors, as well as to the public.

Sweden consists of approximately 40 million hectares of land, of which approximately 1/3 is forest land. The forest industry is significant, and Sweden was the world's fourth largest exporter in the year 2020 of pulp, paper, and partially refined wood products. Over 60 % of the productive Swedish forest land area is certified according to the voluntary, market-based systems FSC or PEFC. According to both FSC and PEFC, forestry measures are completely or partially prohibited in areas classified as Key Biotopes.

Although the registration of Key Biotopes has never had this stated purpose, in practice the registration has meant that a landowner can no longer sell timber from this area to certified timber buyers. Several landowners have therefore brought legal proceedings against the Forestry Agency to get them to stop Key Biotope registration and to delete existing data. In several cases, the landowners have also been successful. The Forest Agency completely stopped registering Key Biotopes in December 2021.

In this paper the result of the legal proceedings is described in context of Swedish forest policy. The findings indicate that policy makers will have to balance conflicts between economic and ecological interests in a delicate way henceforth, regarding the Swedish forests.

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## **1. INTRODUCTION**

The Swedish Forest Agency has since the mid-1990s inventoried natural values in the Swedish forest and registered locations that constitute so-called Key Biotopes. The information on Key Biotopes in the form of geospatial data is accessible to multiple actors in the environmental and forestry sectors, as well as to the public.

The investigation of natural values and registration of Key Biotopes has until recently not been regarded as decision making on behalf of the Forest Agency, but rather knowledge compilation to serve as support for subsequent decisions concerning for example logging permits or formations of nature reserves.

During the last few years there has been increasing objection from landowners, regarding the registration and publication of information on Key Biotopes within their property. These objections have led to several court cases between landowners and the Forest Agency, which in turn have led to the decision from the Forest Agency in December 2021 to stop their registration of Key Biotopes. According to the decision, the Forest Agency will also, after a request from a landowner, delete existing data on existing Key Biotopes registered after June 27<sup>th</sup> of 2019 (Decision 12-21-2021 by the Swedish Forest Agency, ref. 2021/4802).

In this paper six court cases are examined (in section 3) and some implications of the processes are discussed briefly in a final chapter (section 4). To put the court cases and the discussion in a context, a short and general overview is first given of certain circumstances regarding the Swedish forest, forest industry and forest policy (in section 2).

## **2. GENERAL OVERVIEW**

In this section certain circumstances are described, that can be important to understand when analyzing the court cases in section 3. References can be used for further inquiry.

### **2.1. The Swedish Forests and the Swedish Forest Industry**

Sweden consists of approximately 40 million hectares of land. Approximately 1/3 or 28 mn hectares are considered as forest land. There are significant regional differences between the

south of Sweden (approx. 39 % forest land in Skåne region) and the central and northern Sweden (approx. 89 % in Gävle region) (SOU 2020:73 s. 83).

The Swedish Forest is owned to 48 % by private persons (approx. 11 346 hectares) and 24 % by private companies (approx. 5 691 hectares). The remaining 28 % is mainly owned by the state (approx. 1 774 hectares), state owned companies (approx. 3 108 hectares) and other private and public actors (for example the Swedish church) (SOU 2020:73 s. 85-86). There are legal restrictions that prevent private companies from buying forest land from private persons, as well as restrictions for private persons to buy property in certain sparsely populated areas unless they meet certain criteria regarding residency (SFS 1979:230).

It should be noted that for example the state-owned company Sveaskog acts as a business enterprise, so publicly owned forest land can be either natural reserves, or land where commercial forestry is undertaken, or have many other different designated land uses.

The Forest industry of Sweden is significant. In 2020 Sweden was the 4th largest exporter of pulp, paper, and partially refined wood products. The value of exported products in the same year was approximately 145 billion SEK or € 13 billion (Skogsindustrierna 2022).

Approximately 1 % of the Swedish forest is logged every year (Ibid.). Clear cut logging is the completely dominant method of logging, regardless whether the land is owned by a company or by private persons. In most cases private persons assign to private companies or an association of forest owners to do the actual logging and to transport the timber to saw mills. The land owner earns a margin after costs are subtracted and the company or association that handles the logging has a big influence regarding planning and execution of the logging.

Among the biggest private companies are SCA, Holmen, Stora Enso and BillerudKorsnäs. Tens of thousands of private landowners are members of the regional economical associations Norra skogsägarna, Norrskog, Mellanskog and Södra Skogsägarna.

## **2.2. The Forestry Act**

Swedish Forestry is regulated in The Forestry Act (law no. SFS 1979:429). The law states that the forest is a national asset and renewable resource that is to be managed sustainably yielding a good revenue, while biodiversity is maintained (SFS 1979:429 section 1).

The Forestry Act states the responsibilities of a forest owner. There is for example an obligation to restock woodland after logging and to use established methods and tree species that are suitable for the site when restocking (Skogsstyrelsen 2023). There is also an obligation to

notice the Forest Agency before logging takes place (SFS 1979:429 section 14). Such notice must be made six weeks in advance, according to The Forestry Decree (SFS 1993:1096 section 15 and 15 b). If the Agency has objections to the proposed logging, it must act within this time. Otherwise, the proposed logging can take place. These requirements give the Agency a possibility to undertake measures to ensure adequate methods of logging are used and that environmental standards are met.

For certain areas and forest types a permit from the Forest Agency is required for logging, for example in mountainous woodland where regrowth is more difficult (“fjällnära skog”) (SFS 1979:429 section 15). In such areas more considerations are necessary regarding nature, cultural heritage, and reindeer husbandry (Skogsstyrelsen 2023).

If the proposed logging activity will or might significantly change the natural environment on the actual site, the bar is raised regarding what information the landowner must present to the Forest Agency. In this situation the notice is regarded as a request for consultation according to the sixth chapter of the Swedish Environmental Code (law no. SFS 1998:808) (SFS 1993:1096 section 15 a).

The Forestry Act is according to the above commonly described as based on two equal goals, *the production goal* (“sustainably yielding a good revenue”) and *the environmental goal* (“maintain biodiversity”). The law does not describe in detail how these goals should be met. Rather, the law assumes that actors in the Forestry sector will take their responsibility to live up to these goals (“sektorsansvaret”, *the responsibility of the sector*).

### **2.3. The Swedish Forest Agency**

The Swedish Forest Agency is the administrative authority regarding Forestry matters. Its mission is to ensure that the Swedish forests are managed in such a way that the forest policy goals decided by the Swedish parliament (“riksdag”) is achieved (SFS 2009:1393 section 1).

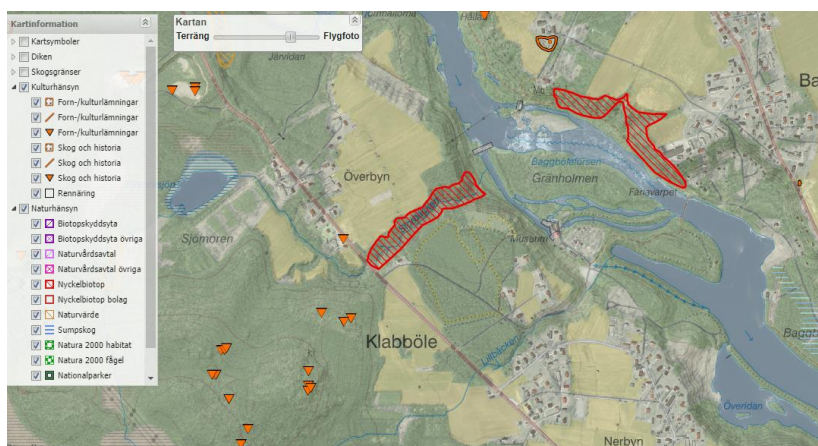
The tasks of the Forest Agency are described in section 2 of the Decree with instruction for the Swedish Forest Agency (decree no. SFS 2009:1393). The agency is for example responsible for legal supervision (p1) and provision of advice and information on forest management (p3). Furthermore, the Agency is responsible for inventoring and evaluation of how the forests are managed in relation to forest policy goals (p2). The Agency shall also work to ensure that environmental policy goals decided by the parliament are reached and, if necessary, propose measures for the development of environmental work (p4), as well as coordinate evaluation and reporting in relation to the environmental policy goal *Living forests* (p5, see description in section 2.6).

## 2.4. Key Biotopes

In this section follows a description of Key Biotopes and the work that the Forest Agency has been undertaking regarding the inventorying and registration of Key Biotopes since the 1990's. Most of this description comes from a statement from the Agency that constitutes the appeal against a decision from the Administrative Court of Appeal of Jönköping, in the case no. 6 in section 3 of this paper (Skogsstyrelsen 2022).

Key Biotopes are areas which - from an overall assessment of the biotope's structure, species content, history and physical environment - have significant value for the forest's flora and fauna and where red list species are or can be expected to be present (Skogsstyrelsen 2020, p. 5, authors translation). Endangered and/or rare species can be dependent for their survival on areas that constitute Key Biotopes.

The Forest Agency has since the 1990's registered finds of Key Biotopes and this work has previously been handled in such a way that these measures do not constitute appealable decision making by the Agency. Inventorying and registration of Key Biotopes has been a not insignificant part of the Agency's activity between the years 1990 and 2021. There are approximately 68 000 findings of Key Biotopes registered in the Agency's database (Skogsstyrelsen 2022). The data is accessible through the website of the Agency and shared with many actors within the Forestry and Environmental Sector. An example from the web application on the Agency's website, accessible for everybody, is shown in picture 1 below. The database is accessible at <https://kartor.skogsstyrelsen.se/kartor/>.



Picture 1. A screenshot from the web application “Skogens pärlor” (“Gems of the Forest”), showing natural values in the Swedish landscape. Key Biotopes are shown in red.

In the year 1990, The Forest Agency was commissioned by the Swedish Government to carry out a trial inventorying assignment of particularly valuable woodland biotopes, that can contain rare plants and animals. After two years of trial operations, the Forest Agency carried out a full-scale Key Biotope examination in the years 1993-1998. This was done nationwide on land owned by minor scale forest owners. During the years 2001-2006 a corresponding nationwide examination was undertaken on forest land owned by private enterprises. Since 2006, registration of newfound Key Biotopes has been done mainly when these have been encountered for example in field visits due to logging notices. The work undertaken has been financed by grants from the Government. In 2018 the Agency received the assignment from the Government to carry through a new national examination of Key Biotopes. This assignment was however revoked in June 2019 (Skogsstyrelsen 2022).

## **2.5. Certification programs (FSC and PEFC)**

The Forest Industry has seen an increasing market demand of affirmation that products from the forests come from sustainable sources and practices. The industry has responded to this demand through the development of voluntary third-part certification systems.

There are two voluntary market based systems for certification of forestry in Sweden, which together comprise over 60 % of the productive forest land (SOU 2020:73 p. 145f). These are the Swedish *Forest Stewardship Council* (FSC) and the *Programme for the Endorsement of Forest Certification Schemes* (PEFC).

The Swedish FSC is an independent associated part of the global *Forest Stewardship Council*, with the stated purpose to promote an environmentally friendly, socially responsible, and economically viable cultivation of the world's forests (FSC Sweden 2020, p. 4)]. The Swedish FSC was established in 1996 and the latest standard of practice was adopted in 2020 (FSC Sweden 2020 and SOU 2020:73 p. 146).

The Pan European Forest Certification Council was established in 1999 as a response to the demand for a certification system more adapted to small-scale forestry enterprises (mainly private landowners' businesses). The Swedish branch of PEFC was founded in 2000 and its standard of practice aims to develop an economically sustainable and valuable forest production, and biological diversity, while cultural environments, social and aesthetic values are protected (PEFC 2022a p. 5).

According to both FSC and PEFC standards, forestry measures are completely or partially prohibited in areas classified as key biotopes (SOU 2020:73 p. 145f with reference to FSC

Sweden 2020, principle 6.4.1.c, and PEFC 2022b section 5.1.4. and 5.1.6.). The registration by the Forest Agency of a Key Biotope within a property can therefore – even though this has not been part of any consideration from the Forest Agency – affect the possibility for the landowner to obtain FSC or PEFC certification. This is an indirect consequence of how the certification programs have chosen to formulate their certification criteria.

## **2.6. The Sustainable Development Goals (SDGs) and the Swedish Environmental Goals**

In 2015 the United Nations adopted The Sustainable Development Goals (SDGs). There are 17 SDGs that member countries have committed to prioritize, in order to end poverty, protect the planet, and ensure that by 2030 all people enjoy peace and prosperity (UNDP.org).

Sweden has been working with national Environmental Goals since 1999 and to great extent the national goals align with the ecological dimensions of the global SDGs (Naturvardsverket 2023) The national Environmental Goals are oriented around 16 topics, for example *Living forests*, and *Rich plant and animal life*.

The Swedish Forest Agency is responsible evaluating the national environmental status and development within the topic *Living Forests*. As described in section 2.3, the Agency shall also work to ensure that environmental policy goals decided by the parliament are reached and, if necessary, propose measures for the development of environmental work (Skogsstyrelsen.se, *Miljömål*, and SFS 2009:1393 section 2).

## **2.7. The decision making of Swedish administrative authorities**

The functioning of Swedish administrative authorities is regulated in the Administration Act (law no. SFS 2017:900). Some short notes should be made about the act and established practice.

According to the *principle of legality* an administrative authority is only allowed to take actions that are supported by the legal system (SFS 2017:900 section 5). Decisions can be made by a single executive, several executives jointly, or through automated decision making (Ibid, section 28). According to established practice, what is decisive for if a measure taken by an authority constitutes decision making or not, is mainly whether the measure is intended

to be action-directing for another actor or not (Prop. 2016/17:180 s. 23 ff). The requirements for what should be considered decision making are also low (HFD 2002 ref. 12).

Appeals against decisions made by an administrative authority can be lodged in the General Administrative Courts [SFS 2017:900 section 40].

## 2.8. The Swedish General Administrative Courts

There are three kinds of courts in Sweden. There are the General Courts, the General Administrative Courts (GAC:s) and the Special Courts (Government Offices of Sweden 2023). Appeals against decisions made by authorities are handled in the GAC:s. These have three instances, see table 1.

Designation	Number of courts
Administrative Court (“ <i>Förvaltningsrätt</i> ”)	12
Administrative Court of Appeal (“ <i>Kammarrätt</i> ”)	4
Supreme Administrative Court (“ <i>Högsta förvaltningsdomstolen</i> ”)	1

The Administrative Courts (“ACs”) are the court of first instance. The courts handle cases typically concerning disputes between private persons and the authorities. A decision by a Swedish authority can typically be subject to appeal to the AC, by a person or enterprise affected by the decision. The Administrative Courts of Appeal (“ACAs”) are the court of second instance, and review decisions made by the ACs. The Supreme Administrative Court (“SAC”) is the third and last instance. Rulings from the SAC constitute precedents.

A trial in the SAC requires a leave to appeal (“*prövningstillstånd*”). The SAC should give a leave to appeal if one of the two following requirements are met (SFS 1971:291 section 36).

1. if it is of importance for the uniform application of the law that the appeal is adjudicated.
2. if there are extraordinary reason for such an adjudication, such as grounds for review due to substantive defects or that a decision by the ACA obviously is based on gross oversight or error.

## 3. THE LEGAL CASES EXAMINED

In this section six legal cases from the GAC:s will be examined. Five of these cases have been settled in the second instance, the ACA, and these judgements are valid. The sixth one is still currently processed in the final instance, the SAC, where the court has yet to decide if it will give a leave to appeal (Diary of case 7527-22). The cases are compiled in table 2 below.



No.	Date of decision	Court	Case no	Comment
1	October 14 <sup>th</sup> 2020	Administrative Court of Appeal in Göteborg	1727-20	Valid judgement
2	November 30 <sup>th</sup> 2020	Administrative Court of Appeal in Sundsvall	2853-19	Valid judgement
3	March 10 <sup>th</sup> 2021	Administrative Court of Appeal in Jönköping	638-20	Valid judgement
4	March 10 <sup>th</sup> 2021	Administrative Court of Appeal in Jönköping	3778-20	Valid judgement
5	June 23 <sup>rd</sup> 2021	Administrative Court of Appeal in Stockholm	7503-20	Valid judgement
6	December 7 <sup>th</sup> 2022	Administrative Court of Appeal in Jönköping	4139-21	Not yet valid.

In the description below, the different courts are abbreviated as above, and the landowner/landowners are called LO/LOs.

### 3.1. Case no. 1 – 1727-20 (Administrative Court of Appeal in Göteborg)

In June 2019, the Forest Agency informed a landowner (LO) in three separate letters that the Agency had registered three Key Biotopes on LO's property. The LO lodged an appeal against the information in the AC and requested that the registered data should be deleted. The LO stated that the measure to register Key Biotopes on his property is not supported by the legal system and has severe consequences for him, such as more administrative requirements and negative effects on property value etc. The Agency replied that the registration does not constitute decision making and cannot be appealed.

The AC announced that the registration affects the LO in a not insignificant way and should be considered an appealable decision. The AC also announced that there is not sufficient legal support for the Agency to undertake such measures. Therefore, the AC ruled that the registered data should be deleted.

The Forest Agency lodged an appeal against the AC ruling, and the ACA did another assessment. According to the ACA, the registration did not have any real legal effect for the LO, because it was only a confirmation of actual characteristics of the site in question. The legal burden on the LO was there already due to the existing natural values, and the responsibilities of the LO did not change due to the registration of Key Biotopes. Therefore,

the registration does not constitute a decision. The ACA set aside the ruling by the AC and rejected the initial appeal from the LO (“*avvisning*”).

### **3.2. Case no. 2 – 2853-19 (Administrative Court of Appeal in Sundsvall)**

In April 2019, the Forest Agency registered a Key Biotope on LO’s property. The LO lodged an appeal against the registration measure in the AC and requested that the registration should be annulled. The AC stated that the registration in itself does not have any legal consequences and therefore does not constitute appealable decision making. The appeal was therefore rejected (“*avvisning*”).

The LO lodged an appeal in the ACA, who stated the following. The registration of a Key Biotope is not only a notification of easily ascertainable facts but follows a relatively extensive investigative work that requires qualified assessments. The registration also has the form of a final decision. It therefore constitutes decision making and the registration is appealable. The ACA annulled the ruling of the AC and remanded the case to the lower court for a new trial.

It can be noted that the ACA of Sundsvall came to a different conclusion compared to the ACA of Gothenburg (in Case no. 1), who did not regard the registration as decision making.

### **3.3. Case no. 3 – 638-20 (Administrative Court of Appeal in Jönköping)**

Case no. 3 is the first of two cases, which the ACA of Jönköping adjudicated on March 10<sup>th</sup>, 2021. The second case adjudicated the same day is case no. 4, see section 3.4. The same four judges adjudicated both cases.

A LO made a request at the Forest Agency, that the inventory work being done by the Agency, concerning his property, should stop. The Agency informed the LO on the June 11<sup>th</sup>, 2019, in written form, that registering Key Biotopes is only knowledge compilation and that these measures does not constitute decision making and therefore cannot be appealed. The LO lodged an appeal against the information in the AC and requested that the registered data should be deleted.

The AC announced that there is sufficient legal support for the Agency to register Key Biotopes, mainly because the Agency have had the commission from the Government, and the corresponding funding from the Government, to undertake such measures. Furthermore, the registering of Key Biotopes constitute decision making which is appealable. According to the AC, there was however no reason to dispute the decision taken by the Agency to register the

Key Biotope in question. The appeal from the LO was therefore rejected (“*avslag*”). The LO lodged an appeal in the ACA against the ruling from the AC. The ACA however made the same assessment as the AC and rejected the appeal from the LO (“*avslag*”).

It can be noted that the ACA of Jönköping agreed with the ACA of Sundsvall (Case no. 2), on the condition that registration constitutes decision making. This is also the first case described where the ACA actually also states that the measures of registering Key Biotopes does have sufficient legal support.

### **3.4. Case no. 4 – 3778-20 (Administrative Court of Appeal in Jönköping)**

Case no. 4 is the second of two cases, which the ACA of Jönköping adjudicated on March 10<sup>th</sup>, 2021. The first case adjudicated the same day is case no. 3, see section 3.3.

The Forest Agency informed a LO that the Agency had registered a Key Biotope on the LOs property. The LO lodged an appeal against the information in the AC and requested that the registered data should be deleted. The AC stated, with reference to Case no. 1, that the registration does not constitute a decision. It should be noted that the ruling from the AC came before the ACA’s rulings in Case no. 2, 3 and 4. According to the AC, since the registration did not constitute a decision, neither was it appealable. The appeal was therefore rejected (“*avvisning*”).

The LO lodged an appeal in the ACA against the ruling from the AC. The ACA stated, with reference to Case no. 3, that the registration sure did constituted decision making, and that the registration was appealable. The ACA annulled the ruling of the AC and remanded the case to the lower court for a new trial (in the same way as in case no. 2).

### **3.5. Case no. 5 – 7503-20 (Administrative Court of Appeal in Stockholm)**

In November 2019 the Forest Agency registered a Key Biotope on a LO’s property. The LO lodged an appeal against the decision in the AC and requested that the decision should be annulled. The AC stated, with reference to Case no. 1, that the registration does not constitute a decision. It should be noted that the ruling from the AC came before the ACA’s rulings in Case no. 2, 3 and 4. According to the AC, since the registration did not constitute a decision, neither was it appealable. The appeal was therefore rejected (“*avvisning*”).

The LO lodged an appeal in the ACA against the ruling from the AC. The ACA stated that the registration sure did constituted decision making, and that the registration was appealable.

Unlike the ACA in Jönköping however (in Case no. 3), the ACA of Stockholm ruled that there is not sufficient legal support for the Forest Agency to register Key Biotopes. For the first time in the case examined, the appeal of the LO in other words was approved by the ACA and the decision by the Forest Agency to register a Key Biotope was annulled.

### **3.6. Case no. 6 – 4193-21 (Administrative Court of Appeal in Jönköping)**

The Forest Agency registered Key Biotopes on a property belonging to two LOs, on two different occasions. The first occasion was in 1995 and the second in September 2016.

In October 2019, the two LOs requested that the Agency should delete the information on Key Biotopes within their property. The Agency responded in November that the locations were regardless considered as Key Biotopes and that no appealable decision had been made regarding this matter. The LO lodged an appeal against the answer in the AC and requested that the information should be deleted.

The AC stated that the registrations did constitute decisions and that the statement from the Forest Agency, that it would not delete the data, was also an appealable decision. Furthermore, there was according to the AC not enough legal support for the Agency to undertake these measures. Hence, the AC annulled the two registrations.

The Forest Agency lodged an appeal in the ACA against the ruling from the AC. The ACA stated that the registrations did constitute appealable decisions, and like the AC and the ACA of Stockholm in case no. 5, the ACA ruled that there is not sufficient legal support for the Agency to register Key Biotopes. Therefore the Agency's appeal was rejected ("*avslag*").

It can be noted that the ACA in this case ruled, in accordance with the statements from the ACAs in case no. 2-5, that registration of Key Biotopes constitute decision making. Unlike the previous ruling the same court in case no. 3 however, the ACA in this case did not consider that there was sufficient legal support for such registration. The Forest Agency has lodged an appeal against the ruling in the SCA, and the ruling of ACA is not yet valid.

### **3.7. Summary and conclusions**

The crucial legal questions in the court cases described is whether the registration of a Key Biotope by the Forest Agency constitute decision making, and whether these measures have sufficient legal support (that is, if it is in accordance with the principle of legality). In all cases where the court has found that registration does constitute decision making, the court has also stated that the action is appealable. See a summary in table 3 below.

No.	Case no.	Registration means decision?	Appealable?	According to the principle of legality?
1	1727-20	No	-	-
2	2853-19	Yes	Yes	-
3	638-20	Yes	Yes	Yes
4	3778-20	Yes	Yes	-
5	7503-20	Yes	Yes	No
6	4139-21	Yes	Yes	No

In the last case (no. 6), there is not yet a valid judgement. The Forest Agency has lodged an appeal against the ruling from the ACA in the SCA, which has yet (as of the date February 23<sup>rd</sup>, 2023) to decide if a leave to appeal will be given.

#### 4. SUMMARY AND DISCUSSION

There are many actors and interests that meet in the Swedish Forest. The Swedish Forestry Act states two equal goals for Swedish forest policy, *the production goal*, and *the environmental goal*. Sustainable forestry are crucial in order to reach national environmental policy goals, as well as to achieve ecological targets of the global SDGs. Restrictions out of environmental concern can have implications though, on economical viability in the Forest industry.

Although the registration of a Key Biotope within a property did not have this purpose, the registration can have implications for landowners to obtain third-part certification within sustainability programs such as the FSC or PEFC. This is true even if the registration in itself is only a confirmation of actual characteristics of the site in question.

The court cases described show that applicable law is not completely consistent, but instead the Administrative Courts of Appeal has come to different conclusions on whether the registration of Key Biotopes constitute decision making or not, and whether there is sufficient legal support for the Forest Agency to undertake these measures. In the opinion of the author, it is important enough for the uniform application of law that the Supreme Court of Administration gives a leave to appeal in the case that is still not valid (case no. 6).

Regardless of the outcome if leave to appeal is given, policy makers will have to balance the different interests that meet in the Swedish Forest going forward. Especially to ensure that the forest is being managed sustainably yielding a good revenue, while biodiversity is maintained. The last point seems crucial if the Sustainable Development Goals are to be reached.

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March 10<sup>th</sup>, 2021, Ruling from the Administrative Court of Appeal in Jönköping in case no 3778-20

June 23<sup>rd</sup>, 2021, Ruling from the Administrative Court of Appeal in Stockholm in case no 7503-20

December 7<sup>th</sup>, 2022, Ruling from the Administrative Court of Appeal in Jönköping in case no 4139-21

March 23<sup>rd</sup>, 2023, Diary from the the Supreme Administrative Court in case no 7527-22

### **BIOGRAPHICAL NOTES**

Daniel Janonius Löwgren is a technical judge in the Land and Environment Court in Umeå, Sweden. He graduated with a master's degree in land administration from The Royal Institute of Technology (KTH) in Stockholm, Sweden, in 2010.

### **CONTACTS**

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Key Biotopes, Registration and Disputes in the Swedish Forest (11939)  
Daniel Janonius Lowgren (Sweden)

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