

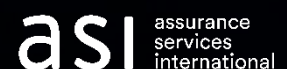


RISK INFORMATION  
ALLIANCE

# Sweden – Forestry

## Risk assessment overview

*July 2026*



## Assessment description

SCOPE	
Geographical scope	Sweden – whole country
Commodity or product	Forestry/Timber
Other scoping element, if any	N/A
DETAILS	
Period of development for the initial draft (prior to consultation)	March 2026
Rationale for development	Comprehensive evaluation of risk across the Swedish forestry sector against RIA indicators.
Language(s)	English
DEVELOPERS	
RIA Members involved in development	<ul style="list-style-type: none"> <li>• SBP</li> <li>• Input and review by B4Trees</li> </ul>
Expert outreach, if applicable	Public Consultation

## Key highlights

Process highlights
The risk assessment follows the RIA methodology and assesses legality and sustainability indicators related to land tenure, management, the environment, conversion risks, social issues, workers' rights and corruption, trade, and taxes
Content highlights

- Negligible risk dominance: In contrast to many high-risk regions, the vast majority of indicators in this assessment for Sweden have a negligible risk conclusion. This is driven by Sweden's strong rule of law, highly digitized property registration (Swedish Land Registry), and strict enforcement by authorities such as the Forest Agency, Work Environment Authority, and Tax Agency.
- Non-negligible risks[KB1.1]: A specific subset of indicators carries a non-negligible risk conclusion. These are strictly isolated to forest conversion and degradation, particular environmental degradations, protections of High Conservation Values (HCVs), rights of Indigenous and Traditional Peoples, and the treatment of seasonal migrant workers.
- Precautionary approach: Sweden has strong legal frameworks, but enforcement gaps in specific areas (such as the application of the Forestry Act versus the Environmental Code during felling notifications) lead to natural value destruction, warranting non-negligible risk designations.

Main non-negligible risks Examples of key non-negligible risks in Sweden include:

- Indigenous Peoples (Sámi) Rights: Land management rights, Free Prior and Informed Consent (FPIC), and customary rights face significant implementation challenges in the reindeer herding areas of Norrbotten, Västerbotten, Jämtland, and Dalarna. Forestry

activities severely threaten reindeer husbandry by destroying ground and hanging lichens, and consultations are often insufficient.

- Biodiversity and High Conservation Values (HCVs): There is ongoing degradation and loss of unprotected boreal old-growth and natural forests. Approximately 1,400 red-listed species are strongly negatively affected by felling. The recent removal of legal requirements for protective buffer zones along small watercourses also poses a threat to aquatic ecosystems and biodiversity.
- Migrant Worker Exploitation: While Swedish forest workers generally enjoy excellent labor conditions and high union coverage, there are systemic problems regarding seasonal migrant workers. Reports highlight underpayment, unpaid wages, excessive working hours, and discrimination among migrant workers who are often hired through subcontractors and lack knowledge of their rights.
- Conversion and Degradation: Conversion and degradation of natural forests and wetlands continue after 31 December 2020.
- Environmental Degradation: Forest management activities are causing damage to cultural heritage sites (primarily due to soil scarification), and wheel rutting is contributing to erosion and methylmercury pollution.

DRAFT

# Main results

## Findings



### 1. LAND RIGHTS AND THIRD PARTIES' RIGHTS

- **Land tenure and management rights: Negligible risk** overall, as land tenure is clearly defined and digitally registered. However, land management rights carry a **non-negligible risk** specifically in Sámi reindeer herding areas.
- **Required permits and planning: Negligible risk.** Felling permits and clear-felling notifications are efficiently tracked via digital geodata.
- **Rights of third parties: Non-negligible risk** regarding the legal, customary, and FPIC rights of Indigenous (Sámi) and Traditional (Tornedalians) peoples in reindeer herding areas. **Negligible risk** for local communities outside these specific northern counties.



### 2. MANAGEMENT ACTIVITIES AND ENVIRONMENTAL PROTECTION

- **Management activities: Negligible risk.** Operations comply with the Forest Act and are supervised continuously by the Forest Agency.
- **Infrastructure & Waste: Negligible risk.** Infrastructure development, waste storage, and disposal are tightly regulated and monitored by authorities.
- **Pollution & Chemicals: Negligible risk.** Pollution is minimised, and the use of chemicals and pesticides is highly restricted, requires permits, and involves mandatory training.
- **Water & Soil resources: Non-negligible risk.** While general water and soil legal requirements are complied with, negative impacts on water resources (aggravated by removal of buffer zone legislation for small streams) and soil (wheel rutting, erosion) remain a non-negligible risk in practice.
- **Fire & Invasive Species: Negligible risk.** Fire use is strictly regulated, and invasive species or commercial GMOs are not used in Swedish forestry.



### 3. ECOSYSTEM CONVERSION, DEGRADATION AND HCV PROTECTION

- **Ecosystem conversion: Non-negligible risk** for the conversion of natural/semi-natural forests and wetlands (swamp forests) after 2008 and 2020. **Negligible risk** for the conversion of peatlands, natural biodiverse grasslands or productive forest plantations.
- **Ecosystem degradation: Non-negligible risk** for the degradation of natural forests since December 2020 and wetlands.
- **High Conservation Values (HCV):**
  - HCV 1 (Species), HCV 3 (Habitats), and HCV 6 (Cultural significance): **Non-negligible risk** due to high conservation value destruction such as felling of high conservation value forest (old-growth forests), deregistration of Woodland Key Habitats, and damage to cultural sites from soil scarification.

- HCV 2 (Intact Forest Landscapes) & HCV 5 (Basic Needs): **Non-negligible risk** localized to specific northern counties and reindeer herding areas.
- HCV 4 (Basic ecosystem services): **Negligible risk**.



## 4. HUMAN RIGHTS

- **Human rights & Armed conflict: Negligible risk.** Sweden ranks among the top countries globally for civil liberties and political rights, and trade does not contribute to armed conflict.
- **Modern slavery & Child labour: Negligible risk.** Child labour is non-existent in the sector, and Sweden enforces strict laws against modern slavery and human trafficking.



## 5. LABOUR RIGHTS

- **Health and safety: Negligible risk.** Occupational health and safety, PPE usage, and housing facilities are of high quality and strictly enforced by the Work Environment Authority.
- **Wages, Working Hours & Discrimination: Negligible risk** for the general Swedish workforce, which enjoys 90% collective agreement coverage, high wages, and strong gender equality protections. However, there is a **non-negligible risk** for migrant workers, who face challenges regarding underpayment, excessive overtime, and discrimination.
- **Freedom of Association & Parental Leave: Negligible risk.** Trade union rights and generous maternity/paternity leave are fully protected and implemented.



## 6. ECONOMIC AND TRADE CONDITIONS

- **Corruption & Document falsification: Negligible risk.** Sweden ranks very high on global corruption control indices, and the sector utilizes robust digital verification systems.
- **Taxes, Fees & Royalties: Negligible risk.** Property, VAT, corporate, and environmental taxes are paid according to strict legal requirements with automated cross-checking and low compliance gaps.
- **Trade & Transport: Negligible risk.** The trade, transport, export/import, and classification of timber products comply strictly with EU regulations (EUTR, CITES) and Swedish customs laws. Trade sanctions are also rigorously monitored.

# Indicators' overview

Land rights and third parties' rights	Management activities and environmental protection	Ecosystem conversion, degradation and HCV protection
<p>Land tenure and management rights are secure.</p> <ul style="list-style-type: none"> <li>Land tenure rights are clearly defined, legally secure, and registered in compliance with applicable legal requirements.</li> <li>Land management rights are clearly defined, legally secure, and registered in compliance with applicable legal requirements.</li> </ul>	<p>Management activities are legally conducted.</p> <ul style="list-style-type: none"> <li>Legal requirements for management activities and related operational requirements are complied with.</li> <li>Legal requirements related to the management of the impacts caused by natural processes such as fires, pests and diseases are complied with.</li> </ul>	<p>Forests and other ecosystems are not converted.</p> <ul style="list-style-type: none"> <li>There is no conversion from forest to agriculture after 31 December 2020.</li> <li>There is no conversion of forest, including forest plantations, after January 2008.</li> <li>There is no conversion of natural and semi-natural forest after 31 December 2020.</li> </ul>
<p>Required permits, planning and protection from illegal activities are in place.</p> <ul style="list-style-type: none"> <li>Harvesting or operational permits are in place and are issued and registered according to legal requirements.</li> <li>Legal requirements for land-use and management planning are complied with.</li> <li>Land areas under management are protected from illegal encroachment and activities.</li> </ul>	<p>Infrastructure associated with management activities is developed and maintained, ensuring minimum impacts on environmental values.</p> <ul style="list-style-type: none"> <li>Legal requirements for the protection of environmental values during development and maintenance of infrastructure associated with management activities are complied with.</li> <li>Development and maintenance of infrastructure associated with management activities is done in a way that minimises adverse impacts on environmental values.</li> </ul>	<p>There is no conversion from natural non-forest ecosystems such as peatland, wetland and biodiverse grassland after January 2008.</p> <p>There is no conversion from natural non-forest ecosystems such as peatland, wetland and biodiverse grassland) after 31 December 2020.</p>
<p>Rights of third parties are respected.</p> <ul style="list-style-type: none"> <li>Legal requirements related to the rights of Indigenous Peoples are complied with.</li> <li>Legal requirements related to the rights of Traditional Peoples are complied with.</li> <li>Legally recognized customary and community rights are identified and respected.</li> <li>The rights of Indigenous Peoples are respected and upheld according to the principles of Free, Prior and Informed Consent (FPIC).</li> <li>The rights of Traditional Peoples are respected and upheld according to the principles of Free, Prior and Informed Consent (FPIC).</li> <li>The rights of local communities are respected and upheld.</li> </ul>	<p>Waste resulting from management activities is managed and minimized.</p> <ul style="list-style-type: none"> <li>Legal requirements related to the storage, treatment and disposal of waste during management activities are complied with.</li> <li>The volume and impacts of waste storage, treatment, and disposal as a result of management activities are managed and minimised.</li> </ul>	<p>Forest and natural ecosystems are not degraded.</p> <ul style="list-style-type: none"> <li>There is no degradation of natural forests since 31 December 2020.</li> <li>There is no degradation of non-forest natural ecosystems.</li> </ul>
	<p>Pollution resulting from management activities is controlled and minimized.</p> <ul style="list-style-type: none"> <li>Legal requirements related to pollution, resulting from management activities are complied with.</li> <li>Pollution, resulting from management activities is controlled and minimised.</li> </ul>	<p>High conversation values are protected, maintained or enhanced.</p> <ul style="list-style-type: none"> <li>Legal requirements related to biodiversity conservation, protected sites, and the protection of endemic, rare, threatened, or endangered species and their habitats are complied with.</li> </ul>
	<p>Water resources are protected and used responsibly during management activities.</p> <ul style="list-style-type: none"> <li>Legal requirements related to the use and protection of water resources are complied with.</li> <li>Water resources are protected and used responsibly with the aim of ensuring long-term viability.</li> </ul>	<p>Concentrations of biological diversity including endemic species, and rare, threatened, or endangered species that are significant at global, regional or national levels are identified protected, maintained or enhanced (HCV1).</p>
	<p>Soil is protected during management activities, and negative impacts are minimised with the aim of securing soil's health.</p> <ul style="list-style-type: none"> <li>Legal requirements related to the protection of soils during management activities are complied with.</li> <li>Negative impacts from management activities on soil's physical, chemical and biological conditions are managed and minimised to secure soil health.</li> </ul>	<p>Intact forest landscapes and large landscape-level ecosystems and ecosystem mosaics that are significant at global, regional, or national levels, and which contain viable populations of the great majority of the naturally-occurring species in natural patterns of distribution and abundance, are identified and protected, maintained or enhanced (HCV2).</p>
	<p>Chemicals are used responsibly in management activities with minimal negative impacts on the environment.</p> <ul style="list-style-type: none"> <li>Legal requirements related to the use, application, storage, and disposal of chemicals in management activities are complied with.</li> <li>The use, application, storage, and disposal of chemicals in management activities are conducted in a manner that prevents harm to the environment.</li> <li>Hazardous or chemicals banned by international conventions are not used in management activities.</li> </ul>	<p>Rare, threatened, or endangered ecosystems, habitats or refugia are identified and protected, maintained, or enhanced (HCV3).</p>
	<p>The use of burning or fire for land preparation and waste management is avoided, whenever possible, and in case of use, it is justified and impacts are minimised.</p> <ul style="list-style-type: none"> <li>Legal requirements related to the use of open burning/fire in operations for land preparation and waste management are complied with.</li> <li>The use of open burning/fire in operations for land preparation and waste management managed and negative impacts minimized.</li> </ul>	<p>Basic ecosystem services in critical situations, including the protection of water catchments and control of erosion of vulnerable soils and slopes, are identified and protected, maintained, or enhanced (HCV4).</p>
	<p>Invasive species in production are controlled and GMOs are not used.</p> <ul style="list-style-type: none"> <li>Legal requirements related to the use, monitoring and control of invasive species are complied with.</li> <li>The use of invasive species is monitored, controlled and impacts mitigated.</li> <li>There is no commercial use of GMO.</li> </ul>	<p>Sites and resources fundamental for satisfying the basic needs of local communities or Indigenous Peoples are identified and protected (HCV5).</p> <p>Sites, resources, habitats, and landscapes of global, national or local cultural, archaeological, or historical significance, and/or of critical cultural, ecological, economic or religious/sacred importance for the traditional cultures of local communities or Indigenous Peoples are identified and protected, maintained, or enhanced (HCV6).</p>

### Human rights

Human rights are respected in all aspects of operations and activities.

- Human rights are respected according to international law including the International Labour Organization (ILO) fundamental Conventions.
- Harvest or trade in products do not contribute to armed conflict.

Modern slavery, including forced and compulsory labour, are not taking place.

- Legal requirements on modern slavery, including forced and compulsory labour, are complied with.
- Modern slavery, including forced and compulsory labour are not used, promoted, or supported in any way.

Child labour is not occurring and employment of young workers is responsibly managed.

- Legal requirements related to child labour are complied with.
- Child labour is not present, and the employment of young workers is responsibly managed.

### Labour rights

Health and safety - facilities and activities are safe and support worker's health.

- Legal requirements related to occupational health and safety of workers are complied with.
- Activities are safe and support worker's health, and workers have access to and use appropriate Personal Protective Equipment for the activities undertaken.
- Housing and facilities are safe and support worker's health.

Workers' rights related to recruitment and contracting are respected.

- Legal requirements related to contracts, working permits, competence certifications and other training requirements are complied with.

Workers are paid fairly and responsibly.

- Legal requirements related to workers' wages and other payments, such as social insurance, are complied with.
- Workers' wages meet or exceed minimum industry standards or other recognized industry wage standards.

Working hours, overtime, rest time and time off are fair and responsible.

- Legal requirements related to working hours, overtime, rest time and time off, are complied with.
- ILO conventions related to working hours, overtime, rest time and time off, are complied with.

Freedom of Association, the Right to Organise and the Right to Collective Bargaining are allowed.

- Legal requirements related to the Freedom of Association, the Right to Organise and the Right to Collective Bargaining are complied with.
- Workers has the Right to Organise and the Right to Collective Bargaining as specified in the ILO Fundamental Principles and Rights at Work.

There are equal opportunities for all, and no discrimination against workers.

- Legal requirements related to discrimination are complied with.
- There is no discrimination against workers.

Legal requirements related to gender equality in the workplace are complied with.

- Legal requirements related to gender equality in the workplace are complied with.
- Gender equality is protected following best practices
- Right to maternity and paternity leave is ensured as defined by ILO 183 and is observed and implemented.

### Economic and trade conditions

Corruption, fraud and conflict of interest

- Legal requirements related to corruption, including bribery are complied with.
- Bribery and corruption does not take place.
- Data and document falsification does not occur.

Taxes, fees and royalties are paid according to legal requirements.

- Legal requirements related to payment of royalties, land/area taxes and fees are complied with.
- Legal requirements related to payment of value-added taxes and/or other sales taxes are complied with.
- Legal requirements related to payment of corporate taxes are complied with, including profit taxes.
- Legal requirements related to payment of trade and/or export taxes and fees are complied with.
- Legal requirements related to environmental taxes are complied with.

Trade and transport of products are conducted according to legal requirements and do not contribute to illicit trade.

- Legal requirements related to trade and transport of products are complied with.
- Legal requirements related to applicable trade restrictions and sanctions are complied with.
- Legal requirements related to the classification of products are complied with.
- Legal requirements related to export and/or import are complied with.
- Legal requirements related to offshore trading and transfer pricing are complied with.
- Legal requirements related to due diligence or due care are complied with.
- Legal requirements related to the harvesting, collection and trade of CITES species are complied with.

- Non-negligible risk: there is a non-negligible risk that the indicator is not met.
- Non-negligible risk – precautionary approach: there is no sufficient information to conclude negligible risk.
- Negligible risk: there is a negligible risk that the indicator is not met.
- Not applicable: the indicator is not applicable in the target country and commodity context.



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The **Risk Information Alliance (RIA)** is a collaboration of organisations working together to address the growing complexity of corporate due diligence and responsible business practices. By pooling resources, funding, and expertise, RIA facilitates the joint production of credible, high-quality, and up-to-date risk data across commodities, sectors, and geographies.

Through the development of a shared methodology, indicators, and a blueprint for a risk data storage platform, RIA enables its members to share and access risk data efficiently and cost-effectively. This collaboration supports better-informed sourcing decisions, stronger sustainability investments, and more consistent due diligence outcomes.

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Learn more: [www.riskinformationalliance.org](http://www.riskinformationalliance.org)

