

CASE STUDY

NETWORK OF NATURA 2000 IN SWEDEN WITH SPECIAL ATTENTION TO THE BALTIC COAST. CONCEPTION AND PARTICULAR EXAMPLES

LOCATION: *Sweden, Baltic coast of the County of Uppsala*

TOPIC: *Biodiversity, Coastal landscapes and ecosystems, Governance, Nature conservation*

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DISCUSSION

The decisions to implement the Natura 2000 network were taken at the EU level far away from the locals' cultural, social and economic dependence. The formalized EU position is that Natura 2000 sites were to be nominated solely on the basis of prescribed ecological criteria across all types of land tenures, including private property. That is, political, economical, cultural and social factors were not to be explicitly considered in the site nomination process, despite previous research indicating the importance of attaining the necessary support from local communities for biodiversity conservation initiatives¹.

Policy formulation and implementation determined only by biodiversity values (or available ecological data) without regard to other interests or forms of knowledge, is not likely to be well received by the affected actors who may fear adverse effects on their livelihood and loss or rights to resource flows from designated areas². This has been pointed out in numerous studies of types of local natural resource management systems, such as water, forests, and wetlands³. In response, disparate actors are likely to construct political strategies in defence of economy, territory (including private property), culture (including recreation), and identity (often vocationally related, e.g. farmers) linked to particular places⁴.

Foucault's5 proposition that typical discourses make it impossible to raise certain questions or argue certain cases appears to be theoretically pertinent here. It has certainly been the case in Finland that biodiversity science's universal and normative view as rendered by Natura 2000 was confronted with other viewpoints (including local), which may have arisen from traditions, culture, political conditions and economic considerations.

¹ Donnelly, 1994
Fiske, 1991
² Beazley et al., 2003
³ Ostrom, 1990
Ostrom et al., 1993
Blomqvist, 1996
⁴ Escobar, 1999
⁵ Foucalt, 1971



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1. Introduction

Natura 2000 is a EU-wide network of nature conservation areas established under the 1992 Habitats Directive⁶ and the 1979 Birds Directive⁷ and primarily designed by Member States. The network is comprised of Special Areas of Conservation (SAC) under the Habitats Directive and Special Protection Areas (SPA) under the Birds Directive. Its aim is to safeguard the long-term survival of Europe's most valuable and threatened habitats and species. Natura 2000 is not a system of strictly protected areas where human activities are excluded. Whereas such areas certainly will be included, most of the network will consist of areas, which are managed in a sustainable way, ecologically (i.e. by conserving valuable habitats and species) as well as socially and economically. The Member States are responsible for the management of Natura 2000 sites, even though considerable portions of them are privately owned.

The Habitats Directive identifies some 200 habitat types as well as 700 plant and animal species of Community importance. By establishing a network of sites across the full distribution of these habitats and species, Natura 2000 is intended to be a dynamic network providing a guarantee for their conservation.

According to Article 3:1 of the Directive, a "coherent European ecological network of special areas of conservation shall be set up under the title Natura 2000. This network, composed of sites hosting the natural habitat types listed in Annex I and habitats of the species listed in Annex II, shall enable the natural habitat types and the species' habitats concerned to be maintained or, where appropriate, restored at a favourable conservation status in their natural range." As mentioned above, the "Natura 2000 network shall include the special protection areas classified by the Member states pursuant to Directive 79/409/EEC." Other EU provisions on species protection complement these site conservation measures⁸.

Each Member State shall, according to Article 3:2, "contribute to the creation of Natura 2000 in proportion to the representation within its territory of the natural habitat types and the habitats of species referred to in paragraph 1."

Given the large natural variation in biodiversity across the EU, the Community is divided into six biogeographical regions:





⁶ COUNCIL DIRECTIVE 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora

⁷ COUNCIL DIRECTIVE 79/409/EEC of 2 April 1979 on the conservation of wild birds

⁸ Commission of the European Communities, Commission Working Document on Natura 2000, 27 December 2002



- Atlantic
- Continental
- Alpine
- Mediterranean
- Boreal
- Macaronesian

For each of these coherent biodiversity regions a list of sites of Community importance is being established⁹.

The establishment of Natura 2000 under the Habitats Directive is carried out in three steps¹⁰:

- Proposals for sites for inclusion in the network (pSCI¹¹) (Member States)
- Selection of a list of sites to be included in the network (SCI¹²) from proposals made by Member States (Commission of the European Communities)
- Designation of selected sites as Special Areas of Conservation (SAC) and establishment of management regimes for them (Member States)

Natura 2000 is considered to be the most ambitious supranational initiative for biodiversity conservation. However, its implementation across Europe has resulted in widespread controversy as it has come in contact with other discourses and interests¹³. The problems experienced in the implementation of Natura 2000 may be largely, but not wholly, attributed to biodiversity values – as prescribed in the Natura 2000 Annexes – being the sole criterion for the selection of sites across all land tenures. This prohibitive condition of listing meant that there was very limited formal capability to consider perspectives and interests that were argued by afflicted parties during the listing process or subsequent disputes over listings. That is, when Natura 2000 objectives did not coincide with other interests, practises or perspectives, conflicts arose.

The designation of pSCIs is based on comprehensive assessments of habitats and species present in each country. As stated above, it should be an exclusively scientific exercise. The assessments include for every proposed site the representativity, ecological quality and area of each habitat type as well as the size, density, degree of isolation and quality for the species concerned. On the basis of these criteria Member States make an overall European assessment of the importance of their sites for each habitat type and species¹⁴.

In practise, the EU Member States designation processes vary considerably in their consideration of cultural/social values as weighted against scientific criteria. Another

⁹ Ibid.

¹⁴ Commission of the European Communities, Commission Working Document on Natura 2000, 27 December 2002





¹⁰ Ibid.

¹¹ Proposed Site of Community Importance

¹² Site of Community Importance

¹³ Weber, X and Y Christophersen 2002------



key factor is the extension of Natura 2000 sites to private land. This raised the stakes and significantly affected the mix of actors affected by the designation and planning process. It also stimulated public debate around such fundamental issues as private property rights, democracy and identity.

The level of conflict varies across Member States' domains. For example, the designation process caused considerably less controversy in Sweden than in Finland where widespread public unrest and legal disputes has characterized the implementation of Natura 2000 up to now¹⁵.

Member States have a responsibility to monitor the conservation status of Natura 2000 sites and to bring about measures to ensure a favourable status.

The development of management plans is a key instrument for both ensuring the appropriate conservation and management of the sites and establishing the framework for judging the compatibility of different uses with conservation objectives. They also represent an excellent way to actively involve key interest groups in management decisions.

Given the extensive range of habitat types and local conditions, it is obvious that there is no standard formula for conservation and management that can be applied. However, as a general rule it will be important to continue with traditional management regimes which very often have been crucial in maintaining habitats which are valued today.

The Directive also provides for the assessment – through an EIA¹⁶-procedure – of development proposals, which are likely to have impacts on designated sites. Even if significant damage to a site will occur, the Directive does not preclude development. Member States may authorise development in cases where it represents an overriding public interest and no viable alternatives are available. However, in these cases they are obliged to implement compensation measures by creation or improvement of habitat elsewhere to maintain the integrity of the network. In the case of development that will have an adverse impact on sites with priority habitats or species (particularly rare and vulnerable ones), the Directive requires the Commission to give an opinion on whether an overriding public interest is involved¹⁷.

SPAs under the Birds Directive are selected and designated by Member States based on scientific criteria in a similar procedure. The Commission determines if the designated sites are sufficient to form a coherent network for the conservation of vulnerable and migratory species¹⁸.

¹⁷ Commission of the European Communities, Commission Working Document on Natura 2000, 27 December 2002 ¹⁸ Ibid.







¹⁵ Malmsten, Annukka-----

¹⁶ Environmental Impact Assessment



2. Natura 2000 in Sweden

Sweden (and Finland) joined the EU in 1995. As a consequence, the existing biogeographical regions were supplemented with the Boreal region. Also a number of habitats and species were added to the existing lists. Only habitats and species that are not found in the rest of the EU were included. The process of Natura 2000 is considered to be the greatest specific step forward for the nature conservation efforts in Sweden since the establishment of the first national parks almost a century ago¹⁹.

A first list of pSCIs was compiled in 1995 and sent to the Commission. It consisted mainly of protected areas and therefore had to be supplemented with a great number of non-protected sites. After successive additions, the Swedish list was on the whole completed in 2004. Only some minor completions remain to be done, inter alia in marine and coastal areas. At present, the Natura 2000 network in Sweden consists of 3903 SCIs and 509 SPAs. There are many overlaps between these two categories and the total number of Natura 2000 sites in Sweden is at present 3992²⁰. See Figures 1 and 2.

The Commission adopted the list of SCIs for the Continental biogeographical region in 2004²¹. It is pointed out in the decision that the list of sites has to be supplemented in certain respects. However, this reservation does not affect any coastal habitats or species.

The Commission adopted the list of SCIs for the Boreal biogeographical region in 2005²². It is pointed out in the decision that Sweden has not proposed sufficient sites to meet the requirements in Directive 92/43/EEC for certain habitats and species. These include the habitat types "Estuaries", "Decalcified fixed dunes with Empetrum nigrum", "Dunes with Salix repens ssp. argentea (Salicion arenariae)" and "Humid dune slacks" as well as the species Unio crassus (a mussel) and Alisma wahlenbergii (a plant). The list of sites has to be supplemented for these habitats and species. For the habitat types "Sandbanks which are slightly covered by sea water all the time" and "Reefs" as well as for the species Phocoena phocoena (porpoise), Halichoerus grypus (grey seal), Phoca vitulina (harbour seal) and Phoca hispida bottnica (ringed seal) it cannot be concluded at present if the network is complete or not. Further examinations are needed.

Both categories of Natura 2000 sites are amply represented in coastal areas, as regards SCIs mainly by specific coastal habitats but also by more terrestrial habitats

²² COMMISSION DECISION of 13 January 2005 adopting, pursuant to Council Directive 92/43/EEC, the list of sites of Community importance for the Boreal biogeographical region





¹⁹ Croneborg, H. 2005. Natura 2000 i svensk naturvård. [Natura 2000 in Swedish nature conservation]. Fauna och Flora 100:1

²⁰ Ibid.

²¹ COMMISSION DECISION in November 2004 adopting, pursuant to Council Directive 92/43/EEC, the list of sites of Community importance for the Continental biogeographical region



(e.g. wetlands, heaths, semi-natural grasslands and forests). The coastal habitats in the Habitats Directive (Annex 1), which are found in Sweden, are as follows²³:

Coastal and halophytic habitats

Open sea and tidal areas

- Sandbanks which are slightly covered by sea water all the time
- Estuaries
- Mudflats and sandflats not covered by seawater at low tide
- Coastal lagoons
- Large shallow inlets and bays
- Reefs

Sea cliffs and shingle or stony beaches

- Annual vegetation of drift lines
- Perennial vegetation of stony banks
- Vegetated sea cliffs of the Atlantic and Baltic Coasts

Atlantic and continental salt marshes and salt meadows

- Salicornia and other annuals colonizing mud and sand
- Spartina swards (Spartinion maritimae)
- Atlantic salt meadows (Glauco-Puccinellietalia maritimae)

Boreal Baltic archipelago, coastal and land upheaval areas

- Baltic esker islands with sandy, rocky and shingle beach vegetation and sublittoral vegetation
- Boreal Baltic islets and small islands
- Boreal Baltic coastal meadows
- Boreal Baltic sandy beaches with perennial vegetation
- Boreal Baltic narrow inlets

Coastal sand dunes and inland dunes

Sea dunes of the Atlantic, North Sea and Baltic coasts

- Embryonic shifting dunes
- Shifting dunes along the shoreline with Ammophila arenaria ("white dunes")
- Fixed coastal dunes with herbaceous vegetation ("grey dunes")
- Decalcified fixed dunes with Empetrum nigrum
- Dunes with Salix repens ssp. argentea (Salicion arenariae)
- Wooded dunes of the Atlantic, Continental and Boreal region

Cederberg, B. och M. Löfroth (ed.) 2000. Svenska djur och växter i det europeiska nätverket Natura 2000. [Swedish animals and plants in the European network Natura 2000]. ArtDatabanken, SLU, Uppsala





²³ Löfroth, M. (ed.) 1997. Svenska naturtyper i det europeiska nätverket Natura 2000. [Swedish habitats in the European network Natura 2000]. Naturvårdsverket;



• Humid dune slacks

3. Natura 2000 sites along the Baltic coast in Sweden

Most of the Baltic coast in Sweden belongs to the Boreal biogeographical region. The southernmost part (southern Öland, Blekinge and Skåne) belongs to the Continental region.

Information about all Natura 2000 sites in Sweden can be found on the web²⁴ of the National Environment Protection Agency. Perspicuous information on all SCIs and SPAs along the Baltic coast (covering both terrestrial and marine areas) has been compiled and analysed. A similar but more detailed study has been carried out in the coastal zone of the County of Uppsala, situated in the middle of the Baltic region. Detailed information about the Natura 2000 sites in the county can be found on the web²⁵ of the State County Board. All large SCIs and SPAs in the coastal zone have been described and analysed. Finally, a case study of habitats linked to the traditional cultural landscape has been carried out at Gräsö, an island in the County.

3.1 The Baltic coast in a national perspective

About 15 % of the SPAs and 10 % of the SCIs in Sweden are located along the Baltic coast, from the County of Norrbotten in the north to the County of Skåne in the south. The number of sites varies between counties but tend to increase southwards. This is mainly due to the counties' size and natural conditions, but it seems as if the knowledge of ecological status and the level of ambition of the regional authorities also contribute to some extent. The size of individual sites varies between thousands of hectares (in most cases including vast sea areas) and less than one hectare. Coastal sites usually include adjoining sea areas. The sites are in most cases dominated by coastal and marine habitats but terrestrial habitats are also included. All habitats enumerated in Section 2, except for some Atlantic ones, are represented.

Most SPAs are fully or partly congruent with SCIs, especially in the southern part of the Baltic. A good half of the sites benefits from some kind of nature protection, but further measures are urgently needed in many cases in order to maintain (or restore) a favourable conservation status.

Only about 10 % of the sites were designated as pSCIs in 1995. The list has gradually been supplemented up to 2004 but further completions are required by the





²⁴ www.naturvardsverket.se/dokument/natur/n2000

²⁵ www.c.lst.se



European Commission (see Section 2). This requirement seems to be scientifically well based and motivated.

3.2 The Baltic coast in the County of Uppsala

Along the Baltic coast of the County of Uppsala there are 139 Natura 2000 sites, 133 SCIs, 19 SPAs and 13 combined areas. The natural (as regards habitats according to Annex 1 of the Habitats Directive) and administrative/legal conditions of sites with an area exceeding 100 ha can be summarized as follows:

Billudden

Area: 1898 ha. (including sea areas) Habitats: estuaries; Baltic esker islands with sandy, rocky and shingle beach vegetation and sublittoral vegetation; coniferous forests on glaciofluvial eskers; boreal Baltic sandy beaches with perennial vegetation; wooded dunes of the boreal region. All sea areas are not classified.

Status: nature reserve, pSCI 1997, SCI 2005.

Långsandsörarna

Area: 279 ha. (including sea areas)

Habitats: natural forests of primary succession stages of land upheaval coast; boreal Baltic narrow inlets; boreal Baltic coastal meadows; western taiga; semi-natural dry grasslands on calcareous substrates; perennial vegetation of stony banks; wooded dunes of the Boreal region; coastal lagoons; hydrophilous tall herb fringe communities; alkaline fens; boreal Baltic sandy beaches with perennial vegetation. All sea areas are not classified.

Status: pSCI 2000, SCI 2005.

<u>Gårdsskärskusten</u>

Area: 445 ha. (including sea areas)

Habitats: natural forests of primary succession stages of land upheaval coast; boreal Baltic narrow inlets; large shallow inlets and bays; Fennoscandian herb-rich forests with Picea abies; bog woodland; alkaline fens; hydrophilous tall herb fringe communities; semi-natural dry grasslands on calcareous substrates; coastal lagoons. All sea areas are not classified. Status: pSCI 2000, SCI 2005.

Ledskär

Area: 370 ha. (including sea areas) Habitats: large shallow inlets and bays; boreal Baltic coastal meadows; Fennoscandian wooded pastures; Fennoscandian lowland species-rich dry to mesic grasslands. All sea areas are not classified. Status: pSCI and SPA 2000, SCI 2005.







Björns skärgård

Area: 1121 ha. (including sea areas)

Habitats: large shallow inlets and bays; boreal Baltic islets and small islands; natural forests of primary succession stages of land upheaval coast; perennial vegetation of stony banks. All sea areas are not classified.

Status: pSCI and SPA 2000, SCI 2005.

<u>Hållnäskusten</u>

Area: 1448 ha. (including sea areas) Habitats: coastal lagoons; alkaline fens; western taiga; boreal Baltic islets and small islands; temporarily flooded deciduous forest; Boreal Baltic coastal meadows. All sea areas are not classified.

Status: nature reserve, pSCI 1995, SCI 2005.

Bleckan, Söderören

Area: 113 ha. (including sea areas)

Habitats: Islets without any well-developed, specific Natura 2000-habitats. Classification is based on presence of arctic tern (Sterna paradisaea) and wood sandpiper (Tringa glareola).

Status: SPA 1996.

Ängskär, Bondskäret

Area: 385 ha. (including sea areas)

Habitats: western taiga; large shallow inlets and bays; boreal Baltic narrow inlets; species-rich Nardus grasslands on silicious grasslands; vegetated sea cliffs of the Baltic coasts; Boreal Baltic coastal meadows; coastal lagoons. All sea areas are not classified.

Status: nature reserve, pSCI 1997, SCI 2005.

Skaten-Rångsen

Area: 2228 ha. (including sea areas)

Habitats: natural forests of primary succession stages of land upheaval coast; coastal lagoons; western taiga; vegetated sea cliffs of the Baltic coasts. All sea areas are not classified.

Status: nature reserve, pSCI 1997, SCI 2005.







<u>Kallriga</u>

Area: 1164 ha. (including sea areas)

Habitats: western taiga; coastal lagoons; natural forests of primary succession stages of land upheaval coast; Fennoscandian wooded pastures; coniferous forests on glaciofluvial eskers, alkaline fens; boreal Baltic islets and small islands; Fennoscandian lowland species-rich dry to mesic grasslands; Fennoscandian deciduous swamp woods; silicious rocky slopes with chasmophytic vegetation; Baltic esker islands with sandy, rocky and shingle beach vegetation and sublittoral vegetation; boreal Baltic coastal meadows; vegetated sea cliffs of the Baltic coasts. All sea areas are not classified.

Status: nature reserve, pSCI 1997, PSI 2005.

Forsmarksbruk

Area: 205 ha. (including sea areas) *Habitats:* Islets without any well-developed, specific Natura 2000-habitats. Classification is based on presence of caspian tern (Hydroprogne caspia), common tern (Sterna hirundo) and arctic tern (Sterna paradisaea).

Status: SPA 1996.

<u>Örskär</u>

Area: 483 ha. (including sea areas)

Habitats: western taiga; vegetated sea cliffs of the Baltic coasts; Fennoscandian deciduous swamp woods; boreal Baltic islets and small islands; alkaline fens. All sea areas are not classified.

Status: nature reserve, pSCI 1997, SCI 2005.

Västerbådan, Lågagrundet

Area: 1600 ha. (including sea areas)

Habitats: Islets without any well-developed, specific Natura 2000-habitats. Classification is based on presence of grey seal (Halichoerus grypus), caspian tern (Hydroprogne caspia), common tern (Sterna hirundo), arctic tern (Sterna paradisaea) and wood sandpiper (Tringa glareola). *Status:* SPA 1996.

<u>ldön</u>

Area: 179 ha (including sea areas)

Habitats: Fennoscandian wooded pastures; western taiga; large shallow inlets and bays; boreal Baltic narrow inlets; species-rich Nardus grasslands on silicious grasslands; vegetated sea cliffs of the Baltic coasts; Boreal coast; Fennoscandian hemi-boreal natural old broad-leaved deciduous forests; boreal Baltic islets and small islands; boreal Baltic coastal meadows; Fennoscandian deciduous swamp woods. All sea areas are not classified.

Status: pSCI 2000, SCI 2005.







<u>Hovön-Alnön</u> *Area:* 384 ha. (including sea areas) *Habitats:* Fennoscandian wooded pastures; western taiga; vegetated sea cliffs of the Baltic coasts. All sea areas are not classified. *Status:* nature reserve, pSCI 1995, SCI 2005.

Fagerön

Area: 507 ha. (including sea areas)

Habitats: western taiga; Fennoscandian hemi-boreal natural old broad-leaved deciduous forests; Fennoscandian lowland species-rich dry to mesic grasslands; boreal Baltic coastal meadows; Fennoscandian deciduous swamp woods. All sea areas are not classified.

Status: nature reserve, pSCI 1995, SCI 2005.

It is evident that the coast of the County of Uppsala represents a rich biodiversity with great values from a conservation perspective. A number of areas contain a mosaic of several or many Natura 2000 habitats, including priority habitats such as western taiga, Fennoscandian hemi-boreal natural old broad-leaved deciduous forests, natural forests of primary succession stages of land upheaval coast and Fennoscandian deciduous swamp woods. They also show a comparatively low level of disturbance. This is the basis for a rich species biodiversity, which includes a considerable number of Natura 2000 species. The conservation status is satisfactory as already half of the described Natura 2000 sites are protected as nature reserves.

The sites also contain marine areas. However, there is a lack of detailed knowledge of the natural conditions in these areas. Therefore, marine habitats are underrepresented in the descriptions of the sites and we do not know to what extent the Natura 2000 network covers the most valuable marine habitats in the area (cp. Section 2).

3.3 The Island of Gräsö

Gräsö is the largest island in a vast and diverse archipelago. Some of the large Natura 2000 sites described in Section 3.2 (e.g. Idön) are located at or close to Gräsö. In addition, there are a number of smaller Natura 2000 sites, in most cases dominated by habitats linked to traditional, small-scale agriculture but in some cases also with coastal habitats of great value to biodiversity conservation. More of the traditional agricultural landscape with its rich biodiversity is conserved at Gräsö than in most other archipelagos and coastal areas in Sweden. This landscape represents great values for conservation of the natural and cultural heritage in such areas in a national perspective. A precondition for its conservation is continued traditional management, e.g. by grazing.







Some important Natura 2000 sites in this area are:

- Eriksdal-Lönnholmen, 67 ha., SCI with Fennoscandian wooded pastures, Fennoscandian lowland species-rich dry to mesic grasslands and boreal Baltic coastal meadows.
- Rävsten, 61 ha., SCI with Fennoscandian wooded pastures, Fennoscandian wooded meadows, natural forests of primary succession stages of land upheaval coast, coastal lagoons, Fennoscandian deciduous swamp woods, boreal Baltic coastal meadows, boreal Baltic narrow inlets, Fennoscandian lowland speciesrich dry to mesic grasslands and Fennoscandian hemi-boreal natural old broadleaved deciduous forests.
- Gräsö gård, 49 ha., nature reserve and SCI with Fennoscandian lowland species-rich dry to mesic grasslands and Fennoscandian wooded pastures.
- Sundsäng, 23 ha., SCI with Fennoscandian wooded pastures, Fennoscandian lowland species-rich dry to mesic grasslands and hydrophilus tall herb fringe communities of plains.

The designation of Natura 2000 sites at Gräsö seems to have given rise to more controversies than in most other parts of Sweden. The most articulated example is Österbyn, a group of traditionally managed farms with Fennoscandian lowland species-rich dry to mesic grasslands and wooded pastures. The grasslands and wooded pastures – altogether 43 ha. – were designated as pSCIs in 2000. As a protest, the landowners – private farmers – immediately discontinued the traditional management of the area, which was a precondition for the conservation of its natural and cultural values. Most devastating was that all grazing ceased and tall trivial herb communities and bushes started to take over. In spite of all efforts from the environmental authorities – including offers to pay extra subsidies to the traditional management of the area if it remained as a Natura 2000 site – the landowners refused to cooperate.

As a consequence of this attitude and the fact that more detailed inventories had revealed another area at Gräsö (Öster-Mörtarö) with similar values and landowners who were positive to a pSCI-designation, the Government in 2003 decided to withdraw the pSCI-designation for Österbyn and replace it by Öster-Mörtarö. It became a SCI in 2005 and has an area of 25 ha. Important habitats are Fennoscandian wooded pastures, semi-natural dry grasslands and scrubland facies on calcareous substrates and boreal Baltic coastal meadows²⁶.

The development at Gräsö is unique in Sweden and an exception from the regulation that designation of Natura 2000 sites should be solely based on ecological criteria. The basis for the exception is the need to involve landowners as far as possible in the management of Natura 2000 sites where traditional agriculture is a precondition for their conservation **and** the fact that an alternative Natura 2000 site was identified in the same area.

²⁶ Based on documents and verbal information from the State County Board, County of Uppsala

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