

# HOW COULD EUROPEAN FORESTS BEST BENEFIT FROM THE EU FOREST MONITORING LAW?

## POSITION PAPER

**F**or decades, intensive forestry practices have meant that healthy biodiverse forests across the European Union (EU) have been replaced with trees that resemble crops. Intensive forest management not only degrades ecosystems, but also reduces the EU's ability to reach its climate goals. And it's not just nature that's suffering. The extractive forestry industry offers fewer and fewer forestry jobs, undermining sustainable rural development.

The EU has a large number of goals and targets covering a wide variety of subjects, but one thing unites them all – there is little chance they will be successful if they do not have a clear way of agreeing baselines, monitoring progress and if they do not lead to action. When it comes to forests, monitoring is particularly important and complex: forests cover a big proportion of EU land, and play many roles including providing habitats for wildlife, carbon sequestration and livelihoods. The climate crisis will also strongly impact forests in ways which are unpredictable, strengthening the necessity of regular and comprehensive monitoring.

Monitoring makes it possible to see what forest governance changes need to be made to improve ecosystem health. It is concerning, therefore, that information about the state of forests, and their trends towards destruction or restoration is often scattered, incomparable, inaccessible, outdated or entirely missing.

Many non-governmental organisations (NGOs), scientists and foresters support the EU's proposed monitoring framework for resilient European forests, or Forest Monitoring Law (FML). This briefing makes recommendations to ensure that the FML will enable the EU to live up to its commitments and base future plans on science, allowing for forest ecosystems restoration, carbon storage and sequestration, species protection and socio-economic prosperity:

- When it comes to indicators, the Forest Monitoring Law should be a one-stop shop for assessing progress on the objectives of the forests stated under the European Green Deal and its implementing legislation. While the proposal contains many relevant indicators, some need to be improved and others are missing.
- Good governance needs to be at the heart of a strong FML. Robust data collection must inform coherent strategic planning, and be used to monitor progress on plans developed inclusively with stakeholders. Accessing funds for forest activities should be conditional on appropriate planning and monitoring of progress.
- There needs to be an objective compilation and review of data, including involvement of environment ministries, national agencies, research institutes, NGOs, competent authorities and international institutions like The Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) and the European Environmental Agency (EEA). Environmental experts should be at the centre of co-decision, implementation and review processes.

The Commission’s proposed FML includes elements of these building blocks including many relevant indicators. If strengthened, European forest could substantially benefit from the proposal.

## The structure of the Commission proposal

**CHAPTER 1** sets out general provisions, subject matter (Article 1), definitions (Article 2) and the Commission-led creation of a forest monitoring system (Article 3).

**CHAPTER 2** details data collection by the Commission and by Member States. Data will be part of a geographically explicit system (Article 4). Specific indicators will be collected by the Commission or Member States (Articles 5 and 8), unless these wish to collect all data (Article 6).

There will be a framework to share (Article 7), store and exchange data (Article 9). The procedure for data quality control and remedial actions is also laid out (Article 10).

**CHAPTER 3** focuses on integrated governance. It includes recommendations for voluntary integrated long term plans (Article 13) and Commission support to develop these (Article 11). Articles 14, 15, 16, 17 and 12 details the logistics of the Regulation.

## DATA COLLECTION

To meet the objectives, there is a need for accessibility and transparency as well as timely delivery of the harmonised data. While the proposal contains some relevant indicators, other crucial ones are missing which would give a good picture of how European forests are evolving.

	Indicators	Proposed modification to strengthen the FML
Indicators which require major improvement.	Location of the European old growth forest	Advance the reporting date for primary and old growth forests and broaden definitions of old growth forests, followed by monitoring of their state.
	Carbon stock and sequestration	Add the conversion-status of high carbon stock areas to inform Land Use, Land Use Change and Forestry (LULUCF) policy.
	Connectivity	Improve the definition of connectivity by using the forest integrity index, which combines forest extent with pressures affecting naturalness.
Indicators requiring minor changes to guarantee alignment between policy and monitoring	The indicators listed in the EU Nature Restoration Law -Article 10	In line with the Nature Restoration Law, add indicator of carbon stock (above and below ground carbon) to FML requirements.
	Location of the forest habitats in Habitat Directive - Annex I	Include clearly defined indicators related to forest habitats within and outside of Natura 2000 in the forest data collection framework to Article 5.
Indicators which are missing	Naturalness and integrity	Include naturalness and the forest integrity index in the list of indicators.
	State and trends of species in a forest	Include more species indicators and DNA metabarcoding in monitoring requirements.
	Forest soil indicators	Enhance the alignment between the indicators and descriptors used in the FML and the Soil Monitoring and Resilience Directive and ensure that the datasets are used for the implementation of both Directives.
	Forest hydrology	Include an indicator to follow the changes and trends in forest hydrology.
	Wood flows and economic indicators	Include EUDR-related data on the location of wood extraction in the monitoring framework.
	Publicly monitor the ratio of wood used for material versus energy.	Include social indicators in the data collection framework.
	Forest structure	Include forest development stage, uneven-aged structure, and height in the forest data collection framework in Article 5

## IMPROVING GOVERNANCE

The European Green Deal has introduced and revised a number of targets and reporting obligations which are relevant for forests and forest resources management. Long-term integrated plans are an opportunity for Member States to devise strategies to reconcile nature protection and economic prosperity objectives.

There is concern that efforts to reach targets such as biomass in Renewable Energy Directive, long-lived wood products in the EU Forest Strategy 2030, and paper packaging in the Packaging and Packaging Waste Regulation may increase demand for wood and hence intensification of forest management. Other, new and revised regulations, such as the EU Biodiversity Strategy 2030 area targets, Nature Restoration Law targets for restoring Natura 2000 forest habitats and other forest ecosystems, and the revised LULUCF targets, should increase protection and restoration of forest ecosystems as well as their contribution to climate change mitigation. Meeting all these targets will require the designation of new and effectively protected areas, and the modification of forest management practices. This will reduce the overall supply of wood from domestic sources.

Meeting all of these difficult-to-reconcile objectives will require robust, data-driven, long-term planning by EU Member States.

The FML should require the development of long-term integrated forest plans for the forestry sector. Coherent plans should be developed with participation of stakeholders, including NGOs, the scientific community, and forest managers and owners, for at least 50 years. Implementation should be monitored and plans regularly revised. Data, especially that collected as part of the FML, and projections of future trends, should be used to describe how targets will be met. Plans should explicitly refer to EU regulations relevant for forest protection, restoration and use of forest resources, and address trade-offs that occur between them.

**We recommend that the production of national strategic plans be made a precondition for accessing EU funds or a condition for national programmes that require State Aid approval.**

## CONCLUSION

For the EU to deliver on the European Green Deal, it needs accurate, harmonised, timely and accessible information about EU forests and forest governance mechanisms. The Commission has produced a strong proposal which now needs to be built on to guarantee efficient synergies between the reporting and strategy-development requirements.

