

Position paper on the EU Forest Monitoring Regulation

Cepi welcomes and encourages all efforts to further increase the knowledge base on European forests and forest resources and improve the quality (including timeliness of information), accuracy and comparability of forest-related data available at EU level. Improving the knowledge and factual database on European forests is the first necessary step to address the challenges that come with climate change. However, monitoring alone is not enough to achieve healthy and resilient forests: adequate investments in forest management and implementation of evidence-based policies are also needed.

The European pulp and paper industry, together with other parts of the forest-based sector, contributes to the viability of sustainable and active forest management. The industry embraces effective reforestation, ensures regeneration of harvested areas, contributes to safeguarding biodiversity and supports active restoration of forests degraded by natural disturbances such as fires, storms, drought or pest outbreaks.

Cepi has reviewed the draft EU Forest Monitoring regulation and would like to bring the following messages to the attention of the policymakers.

Summary of key messages:

- 1) The new framework should be built on well-established monitoring tools such as National Forest Inventories in order to acquire comprehensive knowledge about European forests. Additional indicators should not be introduced until a methodology for monitoring them has been established and agreed upon between Member States.
- 2) Remote sensing tools and ground observation should complement each other in order to obtain an accurate picture of European forests and avoid misinterpretation of data. Satellite observation results should not be publicly shared without validation by Member States who possess ground information provided by National Forest Inventories.
- 3) Mutual exchange on national strategies and transboundary issues should be facilitated in respect of the subsidiarity principle. Support should be given to Member States who do not develop national forest strategies, without introducing a standard template applicable to all countries.
- 4) Monitoring of natural disturbances is essential but not sufficient alone to achieve resilient forests. Adequate resources should be earmarked for prediction, early detection and stock-taking of the most common natural disturbances.

General messages on the proposed framework:

- 1) The new framework should be built on existing well-established monitoring tools to get a comprehensive view and understanding of European forests**

The regulation is presented as a supporting framework to track progress for the EU climate and biodiversity targets. It sets the goal to “*obtain an accurate and complete picture of European forests in the Union to assess their vulnerability and resilience to climate change, and the effectiveness of the measures to help them adapt to climate change*”. This is an important objective that the industry fully supports. At the same time, it is not always obvious how the regulation is going to achieve that objective.

The correct monitoring tools should be selected depending on the purpose of the monitoring: e.g. whether it is more important to prioritise the collection of geographically-explicit data at a very fine scale or have a comprehensive and harmonised picture of the health and productivity of European forests.

It is also important to use a comprehensive set of tools and build on the existing ones. Many relevant indicators are already monitored by National Forest Inventories (NFIs) in European countries and reported via the Forest Europe framework: see, as examples, the criteria for “Forest Ecosystem Health and Vitality” and “Forests Biological Diversity¹”. Where there are information gaps, the priority should be to increase the capacity for monitoring in the concerned Member States.

The harmonisation of existing data compiled by the different NFIs should also be promoted in order to enhance the comparability of the information available. In this respect, the regulation should build on the efforts already carried out by Member States, such as via ENFIN, the [European National Forest Inventory Network](#). The existing EU legislative framework already includes forest-related monitoring and reporting obligations for Member States on climate and biodiversity². In addition, the regulation should build on existing expert groups and established good practices in global forest reporting, such as the UNECE/FAO Team of Specialists on Monitoring Sustainable Forest Management.

Finally, we consider that the collection of the forest data specified in Annex III should not be mandatory until the methodology for collecting them is clarified, as different methodologies serve different purposes and have different cost implications. Those elements should be set via the co-decision process and not secondary legislation, for example by adding a review clause to the regulation.

2) Remote sensing tools and ground observation should complement each other in order to get an accurate picture of European forests and avoid misinterpretation of data

It is recognised that Earth Observation tools are useful for collecting a specific type of data, e.g. on tree cover disturbance, but are not sufficient for determining the cause of the disturbance. To avoid potential misinterpretation and misleading conclusions³, satellite observation results should not be publicly shared without validation by Member States who possess ground information provided by NFIs. Earth Observation has limitations when it comes to the monitoring of indicators such as biodiversity indicators on naturalness of forest, old-growth forests, etc.

The integration of the two monitoring methods – remote sensing and field-collected data of NFIs – is essential in order to provide meaningful information to both policymakers and citizens. As a general principle, maps from satellites should not be used to directly inform policymaking, as “pixel counting” is prone to systematic error.

Furthermore, we do not see the added value of geo-referencing the data to specific “forest units”, as proposed in the regulation, because the scale of such units is not clear, nor is the methodology for determining it. The scale of the units should not be too small (e.g. at the level of forest holding) as this

¹ FOREST EUROPE, 2020: State of Europe’s Forests 2020

² Examples are the LULUCF Regulation and Nature Directives, the revised Renewable Energy Directive and the Nature Restoration Regulation.

³ Breidenbach et al., 2022. Harvested area did not increase abruptly – how advancements in satellite-based mapping led to erroneous conclusions. *Annals of forest science* 79:2. <https://doi.org/10.1186/s13595-022-01120-4>.

would endanger the privacy of forest owners and would not yield significantly better results for the overall monitoring of forest health and productivity.

3) Mutual exchange on national strategies should be facilitated in respect of the subsidiarity principle

We support the facilitation of mutual exchange on transboundary issues (such as natural disturbances or other common challenges) and on long-term strategies among the different EU Member States. At the same time, we do not see the added value of including in the regulation a template for the forest strategies already developed at national level. While support can be given to Member States who do not currently develop such plans, it is important to maintain a bottom-up approach, as national forest programmes and strategies already exist for most Member States and respond to local environmental, social and economic needs and circumstances.

4) Monitoring of natural disturbances is essential and needed, but not enough alone to achieve resilient forests

The real-time monitoring of natural disturbances is very important, and the regulation brings some added value in this respect. Ex-ante monitoring of the risk of natural disturbances, and not just ex-post reporting, is needed if the objective is to improve the resilience of forests. The proposed regulation includes the risk assessment of wildfires, but what is needed is prediction, early detection and stock-taking of the most common natural disturbances.

Mitigation of climate change-related risks is a complex and costly exercise, as the vulnerability of forests to climate change is driven by different factors. Setting up a European monitoring system calls for an allocation of adequate resources. Even in the case of utilising existing tools such as NFIs and Copernicus, it is necessary to plan a sufficient and permanent budget for processing the data into meaningful information that can inform evidence-based policies.

Considering the four points above, we would like to express the following recommendations in order to clarify and/or improve some elements of the monitoring framework.

Cepi's specific recommendations for further clarification and amendments to the proposal:

1. Data collected via satellite should always be verified with the results of ground-based data collection by the National Forest Inventories (NFIs). Member States shall be required to validate the data collected from Annex I indicators before their publication by the Commission, except for forest fires data. This is essential in order to avoid misleading interpretations of satellite data and follows a standard practice in global reporting, e.g. in FAO/UNECE.
2. The scale of a forest unit (definition in Article 2.3) needs to be clarified, and forest units should be established in coordination with Member States. If not defined and used appropriately, the concept could bring very little added value to the monitoring framework. The scale should not be too small, as this could endanger data privacy of forest owners, and it would be more challenging to get timely and updated data.
3. It is of utmost importance, in order to ensure the confidentiality of the location of forest monitoring sites of NFIs, to keep the integrity of the data collection and avoid manipulation of national statistics. To this aim, the data from NFIs should be disclosed only in aggregate form (e.g. at regional level).

4. Some of the indicators listed in Annex I, such as “forest connectivity inside forests” and “tree cover disturbance” need to be clarified in order to have landscape level information and to be able to distinguish the causes of change (e.g. natural vs anthropogenic).
5. The additional indicators introduced in Annex III should rather be introduced at a later stage after a review of the regulation, following a structured discussion with the Member States on the methodology for collecting those data, as well as feasibility, cost, and value for the ultimate objectives of the regulation.
6. This new regulation should not change the forest-related monitoring and reporting obligations recently negotiated at EU level. Some indicators are duplicates from other EU legislative instruments (e.g. Nature Restoration Regulation) but with a different monitoring cycle (e.g. 5 years instead of 6 years for deadwood) which adds an administrative burden for monitoring and reporting.
7. The specialised bodies which shall assist the Commission in setting up the forest monitoring should be detailed (Article 3.3). In doing so, the Commission and the Member States should leverage as much as possible the expertise provided by existing frameworks (e.g. Forest Europe).
8. A standard template for the national forest strategies should not be defined in a binding measure such as a regulation, in respect of the subsidiarity principle. Support should rather be given to Member States who do not currently develop such plans.

Cepi is the European association representing the paper industry. We offer a wide range of renewable and recyclable wood-based fibre solutions to EU citizens: from packaging to textile, hygiene and tissue products, printing and graphic papers as well as speciality papers, but also bio-chemicals for food and pharmaceuticals, bio-composites and bioenergy. We are a responsible industry: 85% of our raw materials are sourced in Europe and certified as sustainable, 91% of the water we use is returned in good condition to the environment. We are the world champion in recycling at the rate of 70.5%. At the forefront of the decarbonisation and industrial transformation of our economy, we embrace digitalisation and bring 25 billion value addition to the European economy and €5 billion investments annually. Through its 18 national associations, Cepi gathers 480 companies operating 860 mills across Europe and directly employing more than 179,500 people.
