

Forest Monitoring Framework for Resilient Forests
Commission's feedback

Forest Monitoring Framework for Resilient European Forests

The Central Union of Agricultural Producers and Forest Owners MTK welcomes to express views on the Forest Monitoring Regulation proposed by the European Commission in November 2023.

The aim of the regulation which is to increase the resilience of European forests is supported by Finnish forest owners. As resilient forests are a prerequisite for healthy forests that sequester carbon, new efforts to achieve this are welcome. Nevertheless, MTK would like to bring up concerns related to the future legislative work on forest monitoring and the most substantive points that could have negative consequences for long-term, sustainable forest management. Forests have multipurpose functions across the Europe which all shall be in focus when preparing forest-related legislation. To enable this goal, EU-wide targets should leave room for nationally tailored approaches and criteria. Therefore, delegated acts that are used for determining details of this regulation are not supported by MTK as they do not bring the needed flexibility for Member States.

Finland has a long history of collecting forest information. Thanks to over 100 years' experience of collecting forest data, it has strategically guided and helped to optimize the nation forest management that has resulted in an impressive growth of Finnish forests over decades. It also has helped Finland for keeping its forests resilient and healthy. This is why the national forest inventories should act as a basis for future data collection.

Clarification on the purpose and needs of the regulation is needed. MTK believes that the current proposal does not justify such a comprehensive regulation on forest monitoring, but the goals mentioned by the Commission (e.g. resilience, multifunctionality) could be reached in a more flexible way with a guidelines document rather than a regulation.

Finnish forest owners call for the Commission to clarify the needs, purposes, and policy objectives of forest data, both in short and long term. As the EU already has tools for forest disturbance detection and various other forest data reporting tools, Finnish forest owners would like to see minimum overlap in reporting to reduce the reporting burden. MTK would support to improve the already existing reporting tools such as Forest Europe and UNECE before establishing mandatory EU-wide reporting framework.

After analysing the proposal, MTK is asking for clarifications about the added value of this instrument: what are the specific purposes and the future interpretations and uses of the data? MTK is emphasising that the additional indicators in Article 8 should only be discussed after receiving information related to the implementation and costs of the mandatory indicators. Additional forest data as foreseen in Article 8 are unnecessary at this stage and would only add further confusion given their lack of description or methodologies.

Forest monitoring should not survey forest owners' management practices. The use of data and full open access of it remains cryptic in the proposal as the proposed definitions on the reporting level are conflicting and hard to understand. Holding-level information, or the closely related terms e.g. to "forest unit" or "monitoring site" should not be covered as the ownership of the data needs to be fully considered. To give meaningful and cost-efficient information on trends in EU forest development, the outcomes of the forest data collection should at the lowest be at regional level (NUTS-2).

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Also, the mandate to data openness is troublesome due to privacy issues. Forest owners should have the right to decide to who to give the data related to their forests to, especially if being assessed on a holding level. Indicators related to the use of forests and characteristics on their future potential should not be disclosed as they are private information and can be misused by third parties. On the use of satellite data, MTK stresses that it is not the right tool to identify changes in forests due to a low level of accuracy that can easily be misinterpreted. To prepare necessary interpretation of the data, the right level of knowledge on forest management in different countries is a prerequisite. MTK also asks for clarifications on sharing data in a map format as the use of them is still unknown.

Additionally, Finnish forest owners would like to emphasise that the collection of some indicators can be very expensive and can result in a full protection of some sites. This might be the case e.g. on old-growth forests whose mapping can bring a lot of costs and impacts both for the forest owners and national authorities. In this case, a possible compensation of those sites needs to be involved in the discussions.

Yearly mappings, e.g. for forest protection sites are also an example of an extensive and costly reporting burden. No data should be collected for "good-to-know purposes" as it is not cost-efficient and does not automatically bring added value. MTK reminds that indicators related to forest disturbances should be in a stronger focus to justify the need of the proposal.

Consider legal basis & subsidiarity for voluntary integrated long-term plans. As forest management practices vary a lot across the EU, MTK emphasizes that integrated long-term planning related to forest management practices should not be part of the proposal. Forest management practices are always chosen based on the best available knowledge on a local and regional level.

Forestry is a national competence, and the subsidiarity principle must be fully respected in this proposal. Collecting forest data through the EU satellites can as well question this principle and therefore a strong cooperation with Member States in data interpretation is crucial.