

## **What are the EU's needs for Forest Monitoring?**

### **A Statement <sup>(1)</sup> by the European State Forest Association (EUSTAFOR)**

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Since the Commission's communication on the initiative for a European forest monitoring framework, the Parliament and the Council have been working hard on shaping this legislation. Especially recent advancements in the negotiations by the Polish Presidency show a positive direction. As the dialogue on the Forest Monitoring initiative continues in the European Council and the European Parliament, EUSTAFOR considers it important to note this work and contribute with the expertise of its members.

The European State Forest Management Organizations (SFMOs), EUSTAFOR's members, are the managers of around 30% of the EU's forest area. EUSTAFOR's members provide, with the combined expertise of 130.000 employees, the daily management of state forests in Europe based on high-quality forest data derived from national forest inventories (NFIs). This data is further complemented by either international forest monitoring systems, such as the International Co-operative Programme on Assessment and Monitoring of Air Pollution Effects on Forests (ICP Forests) or detailed information in the forest management plans elaborated by competent services in the Member States.

It is in this capacity that EUSTAFOR feels compelled to share its position with the Member States and the Commission working within the European Council, as well as with the Members of the European Parliament.

#### **1. Data quality matters**

Access to sound forest data is crucial for the way that European forests are being managed. High-quality data allows forest managers to implement the appropriate sustainable silvicultural measures, determine which tree species are most suitable for specific forest sites vis-à-vis climate change, determine sustainable harvesting levels and intervene quickly in cases of forest disturbances like fires, significant windfalls or pest outbreaks. The data also gives foresters a deeper understanding of ecosystems and assists them in determining which forest areas require tailored management or protection. High-quality, timely data is simply indispensable in the strategic planning of forestry. EUSTAFOR recognises this and strongly encourages the innovation of forest monitoring technology and methodology.

#### **2. Long-standing national monitoring experience**

There is a long history of high-quality forest monitoring in Europe. European countries have established specialised agencies responsible for national forest inventories and forest management planning. Therefore, EUSTAFOR's priority, which it has been advocating for since the publication of this initiative, is that a European forest monitoring system must be based on the existing National Forest Inventories (NFIs). This bottom-up approach to the design of a future European system is crucial because it guarantees continuity in the forest datasets, some of which stretch back over a century. The uninterrupted, homogenous datasets at national level allow forest scientists to recognise trends and model future developments. This data-driven approach is indispensable for sustainable forest management.

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<sup>1</sup> Any statement in this document is to be considered as a reflection of the best available professional expertise and does not necessarily reflect the political commitments of individual member organizations.

Another factor is that these long-running NFIs have been co-developed with the regional forestry sector over time. They have been honed to most efficiently and accurately monitor the forests and forestry sector in their respective geographical areas. The collection and analysis of data through NFIs also allows information to be interpreted in the correct regional context. The second pillar of monitoring experience concerns the ICP Forest Monitoring Network, which has now been in existence throughout Europe for 40 years. The 42 participating countries collect monitoring data on the condition of forest soils and stands, which is added to their openly accessible database.

Besides the earlier named benefits, by building upon these existing systems, duplication of data and unnecessary waste of resources are prevented.

### **3. Innovation must serve the purpose**

While most Member States operate sophisticated, long-running inventory systems, there are certainly instances in which countries can benefit from data gathered by the constantly developing remote sensing technologies, such as planes, drones, and satellite-based imagery enabled by the Copernicus system. EUSTAFOR supports a solution through which European countries may optionally use satellite-borne data for their analyses, assessments and verification. This will guarantee that the responsibility and initiative in the future EU monitoring system remains at the relevant level - with the national governments.

### **4. Design of the indicator framework**

The design of an effective monitoring system that provides added value to the forest sector, hinges on the scope and definitions of the indicators that are to be reported. The relevant indicators to be used and harmonised in the future forest monitoring system should be carefully assessed by the Member States and the European Commission. Together, they will need to thoroughly analyse the costs and benefits of each individual indicator ahead of the ultimate decision. Disclosure of collected information, reporting intervals, data aggregation and its future use, as well as associated administrative and financial burdens, must be carefully considered.

For the definitions of the indicators, EUSTAFOR strongly supports the use of standards developed by international forestry organizations, primarily the FAO, IUFRO and Forest Europe. These definitions are well established, have a broad consensus among governments and have been widely implemented internationally. In most cases, these definitions are already being applied in national forest laws and NFIs, and as such, the continuation of their use in the EU forest monitoring framework will have the least impact on the continuity of the datasets. EUSTAFOR wishes to stress that the Forest Europe process has recently initiated another review of Criteria & Indicators for Sustainable Forest Management (SFM). The EU and its Member States should actively contribute to this process with their know-how and resources, thus making the forest monitoring and reporting consistent throughout the entire pan-European region.

The reporting frequency of the indicators should follow the intervals of the reporting requirements to these international organizations, to prevent unnecessary administrative burden and costs. These intervals should span a minimum of five years to allow for proper identification of trends and minimal clutter in the data.

Another important aspect of the indicators which requires careful consideration is the level of aggregation of the data. To protect the privacy of forest owners, managers and businesses, it is important that the data cannot be traced back to the holdings. The level of aggregation should be national or regional (NUTS 2 level, as defined by EUROSTAT), to be determined per

indicator. In that light, EUSTAFOR also welcomes the removal of the forest unit concept from the legislative text.

## **5. Prevention of overlap and duplication**

EUSTAFOR strongly advocates for the efficient use of indicators within already established reporting frameworks under existing legislation. Thus, the information and data already reported under other EU legislation, such as EUDR, Habitat Directive, etc., should be used. These indicators will not require new reporting beyond the scope of previously published legislation and existing monitoring programs such as ICP-Forests. This approach will reduce the administrative strain on Member States and avoid double reporting.

## **6. Division of roles**

The responsibility of monitoring, assessment, verification and reporting of the data must remain primarily with the Member States. The role of the European Union should be to create incentives to invest in innovation and to enable the use of the best available technology. The Commission should also facilitate a platform where national experts can exchange know-how, discuss and share best practices and experiences, as well as liaise with international systems. While acting in the spirit of resource efficiency, EUSTAFOR Strongly recommends using the existing expert platforms, such as the Standing Forestry Committee.

## **7. Secondary legislation**

All necessary precisions and technical parameters that are not referred to in the legislative text should not come through delegated acts, but through implementing regulations, when appropriate, and be developed in a dialogue with Member States via the relevant expert platforms. This includes the development of new indicators, decisions on reporting intervals and monitoring resolutions. This approach is consistent with the necessity to keep responsibility and initiative in future discussions within the national governments.

## **Conclusion**

It is EUSTAFOR's first and utmost priority that the expertise of local forest managers, as well as the existing infrastructure, is maintained. In that perspective, EUSTAFOR is optimistic about the direction that the dialogue is going both in the EU Council and the Parliament. If done correctly, a European-wide monitoring of forests can prove to be beneficial to forest managers. However, this should always be built upon the national systems that have been carefully designed according to scientific knowledge. EUSTAFOR is willing to contribute to such a process with the know-how and experience of its members.