

# Swedish Forest Industries' (SFIF) position on a New EU Framework for Forest Monitoring and Strategic Plans

## Summary

European forests are important for reaching many common EU objectives. Forests keep most of our terrestrial biodiversity, and they represent one of the most important solutions in addressing climate change, providing both important carbon sinks, as well as supplying renewable and recyclable raw material that displace emissions from fossil fuels and industrial processes. Furthermore, forests provide for jobs, income, economic growth and contribute to secure supply of materials and energy for a resilient EU.

The Swedish Forest Industries Federation (SFIF) welcomes the EU Commission's efforts towards improving the quality and comparability of EU-level forest data. SFIF fully supports the view that improved, transparent and validated data and information enables better decision making. In relation to the initiative, SFIF wishes to make the following suggestions:

1. Clarify roles and responsibilities of EU-level institutions and Member States regarding monitoring, reporting and strategic plans for forests so as to ensure added-value and cost-effectiveness.
2. Ensure mutual reinforcements visa-vi Member States' institutions and actions, in particular their National Forest Inventories.
3. Facilitate Member States' collaboration on trans-boundary issues, while reinforcing national efforts on strategic forest planning.
4. Develop EU-level action related to large-scale natural disturbances.

**The most reliable facts about forests, for most forest characteristics in most EU countries, are obtained through the National Forest Inventories (NFIs)**

## Background

In the beginning of 2023, the European Commission will launch a new legislative proposal for an EU framework for forest monitoring and strategic plans. The aim is to develop an EU-wide forest observation framework to provide open access to detailed, accurate, regular and timely information on the condition and management of EU forests. In addition to improving forest monitoring, this information would lead to more data-driven decision-making on forests within EU and assist EU Member States to develop strategic plans. These plans would lay out the strategic vision of Member States for their forests and the forest-based sector for the next 10, 30 and 50 years and provide "a comprehensive picture of the state, the evolution and the future developments of forests in the EU, as envisioned by Member States".

## Position by SFIF: Main arguments

### 1. Clarify roles and responsibilities of EU-level institutions and Member States regarding monitoring, reporting and strategic plans for forests so as to ensure added-value and cost-effectiveness

SFIF welcomes efforts to harmonise national forest reporting, which is also a priority in global level forest reporting to the UN. However, first **the added value and purpose of a new framework must be clarified, as well as in which areas harmonisation is needed, where possible information gaps lie, and what additional data collection - if any - is needed.**

Monitoring systems should be designed with a clear view of the decisions and processes to be supported. This in turn requires a clear view of the structure of roles and responsibilities, especially regarding the roles of national versus central decision-making, and in each case the level of detail to be addressed. For this reason, **it should be clarified which types of decision-making is expected at the EU central level. Instead of generic centralization of**

**monitoring efforts, the purpose of monitoring at EU level should be reconsidered.** SFIF believes that monitoring related to large-scale and trans-boundary forest damages and pests is an area where centralized or collaborative monitoring may be most relevant.

The sustainable management and use of forests is primarily a matter of local and operational priorities, and therefore also monitoring should be developed with a bottom-up perspective. Responsibilities for data, monitoring and planning in relation to forest management should be at national and local level. Data related to operational forest management should be the property of the forest owner, except for data required for demonstrating legal compliance at the national level.

The new framework must also be assessed in relation to already existing reporting schemes at various levels. Already today comprehensive data collection on forest resources is undertaken at global, pan-European and EU level, under for example the FAO Forest Resources Assessment, Forest Europe, UNECE and related to various existing EU legislation. **A new EU framework must make use of existing reporting schemes, avoiding overlaps in data collection, minimizing reporting burden and ensuring cost-effectiveness.** If more or other data is needed, it might be more efficient to further develop/expand existing reporting schemes instead of developing new frameworks. It could also be useful to look at how to make already existing information more accessible.

**Adequate resources on all levels need to be allocated for building European monitoring.** Also, in the case of utilizing existing infrastructure like NFIs and Copernicus products, it is necessary to plan sufficient and permanent budget for processing the data to meaningful information. It is also important to emphasize that detailed information on, for example, biodiversity development requires ground-based monitoring which requires both substantial financial and labour input. Ground-based monitoring will be most efficiently implemented through national or local-level institutions. Using remote sensing without such field data leads to misinterpretations of the results.

## 2. Ensure mutual reinforcements visa-vi Member States' institutions and actions, in particular their National Forest Inventories

The most reliable facts about forests, for most forest characteristics in most EU countries, are obtained through the National Forest Inventories (NFIs), on which international reporting mentioned above is

based. Therefore, EU-level harmonised reporting should be built "bottom-up", through provision of harmonised information from the MS.

The Swedish National Forest Inventory dates from 1923 and provides a consistent time-series of high-quality data on the state and changes in Swedish forests. Data collection and analyses have gradually expanded to address needs of emerging policy developments. Besides providing a historical perspective and base for policy evaluation, the data is also used to assess and guide policy options and management practises. Many Member States have similar programmes providing high quality data on their forests. SFIF highlights that Member States should continue to gather official national statistics on forests and that field-based data from these inventories provide the most accurate and reliable data source for forest monitoring, that are also adapted to the local social, economic and ecological circumstances. National Forest Inventories should be the basis for the current initiative. The data gathered by Member States could be compiled and made accessible by Eurostat, as a one-stop shop for easy access to forest information.

A priority in the upcoming legislative framework should be to support Member States in developing capacities related to forest monitoring and reporting, especially related to developing NFIs to achieve better quality data and facilitate knowledge-sharing and harmonization between Member States.

**SFIF finds it crucial that forest monitoring is built on evidence-based science and provides accurate data. A situation where alternative facts about forests are formed would undermine the legitimacy for policy making. SFIF highlights that field-based data from National Forest Inventories cannot be replaced by remote sensing, but rather remote sensing can be further developed as a complementary tool, provided it is calibrated with field-based measurements.** An example of limitations of remote sensing and the need for combining remote sensing with the use of large-scale, field-based data is outlined in Breidenbach et al (2022)<sup>1</sup>. If for example expanding the forest component of the Copernicus programme, it needs to be fully considered that only few forest characteristics can be accurately determined through remote sensing. An important example is rapid inventories of forest damage following catastrophic events, e.g. through wind and fire. Caution should be taken in the interpretation and communication of forest data from remote sensing as the limited but accessible information content may distract focus from the need for more in-depth

<sup>1</sup>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>.

variables only possible to obtain through ground observations.

### 3. Facilitate Member States' collaboration on transboundary issues, while reinforcing national efforts on strategic forest planning

In relation to Strategic Forest Plans, SFIF reiterates the Council Conclusions on the new EU Forest Strategy asking for clarifications on the added value of such plans, also in relation to already existing comprehensive national forest programmes or strategies and their related Member States competencies. **Some common long-term objectives can be discussed at EU level together with the Member States in the Council, but each Member State must be able to adapt common views to the specific social, economic and ecological circumstances, and choose the means to achieve these objectives.**

SFIF sees a value in EU facilitation of MS exchange, support and learning from each other on best practices of preparing and implementing existing national forest programmes and strategies and at the same time make national forest-related objectives widely known. Voluntary national strategic plans could be seen as a tool for policy coherence for sustainable development. Forests serve overlapping, sometimes competing, economic, social and environmental demands. Different forest-related EU and national policies are often incompatible as there is no uniformity of forest issues - and there should be no desire to force such uniformity onto a diverse policy landscape. Societal trade-off needs to be done at the national level considering relevant national, EU and international policies impacting forests. Voluntary national forest plans could provide an overview of the role of forests and the forest-based sector for the Member

State at hand. However, there must be flexibility and room for adapting the plan to the needs of the Member State and changing conditions.

SFIF highlights it should be clarified what is meant by "planning" since forestry is a national resource, while EU legislation linked to forests is already integrated into national plans and legislation. In Sweden, as in many other countries, long-term national-level scenario analyses are regularly conducted as a basis for revising national forest policy. Any new EU environmental or climate legislation is incorporated in such scenario analyses, which together with national priorities might imply changes in national forest policy.

### 4. Develop EU-level action related to large-scale natural disturbances

Natural disturbances and disasters, such as forest fires, droughts, and insect outbreaks, is an area where increased EU action would be welcomed, for example by cooperation on early warning and information systems to help monitor significant transboundary impacts of forest disturbances, as well as implementing shared transboundary response mechanisms.

THE SWEDISH FOREST INDUSTRY is an essential contributor in the green transition to a more circular and biobased economy. The industry refines wood resources to bio-based products, such as pulp, paper, board, packaging material, sawn timber, refined wood products, biobased electricity and heat and advanced biofuels. The core business is industrial activities based on wood sourced from sustainably managed forests, but among the industry are also some of the largest private forest holdings in Europe. Any forest, climate, environmental, energy and product related European Union policy is of high importance.

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