Swedish Forest Industries' position on a monitoring framework for resilient European forests

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 carbons 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 data and information enables better decision making. In relation to the initiative, SFIF wishes to make the following suggestions:

1. **Focus on the overall state of forests at EU level**
2. **Reexamine indicators that lack defined methodology and clear purpose**
3. **Build a bottom-up framework based on National Forest Inventories**
4. **Refrain from including provisions for voluntary long-term forest plans**

The most accurate and cost-effective way of monitoring forests is through the National Forest Inventories (NFIs)

Background

The legislative proposal outlines 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. The monitoring is centered around data from satellites and national forest inventories (NFI:s), but also includes additional indicators where the methodology is not yet defined. The proposal includes the possibility for Member States to develop or adapt existing integrated long-term forest plans.

Recommendations by the Swedish Forest Industries:

SFIF welcomes efforts to harmonise national forest reporting, which is also a priority in global level forest reporting to the UN. SFIF presents the following recommendations on how the framework could achieve the stated objectives in a robust and cost-effective way.

1. Focus on the overall state of forests at EU level

The proposed regulation aims 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, and to reach it in a robust and cost-effective way **SFIF sees a need for reassessing and clarifying some of the data to be collected and the policy relevance at EU level, as well as how it relates to already existing international forest data reporting and data integrity issues.**

Furthermore, the level of resolution for indicators must be reassessed since it has important implications for cost, data protection, data quality and

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forest policy. 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. The most accurate and cost-effective way of monitoring is the national forest inventories, which is not intended to be used for creating high-resolution maps. **SFIF proposes that it should be clarified that the aim is to monitor through statistical data the overall state of the forest at aggregated EU level, and the level of detail and resolution should be adjusted accordingly for all indicators.**

2. Reexamine indicators that lack defined methodology and clear purpose

Article 8 includes additional indicators without clearly defined methodology or purpose. Mixing diverse types of data in new ways that it was not intended for creates uncertainty on the accuracy and relevance of the results. Detailed mapping of large forest areas is much more challenging than the available NFI:s based on statistical samples. Depending on the exact method, the mapping would be time consuming and costly with extensive ground surveys if any accuracy is to be achieved. Moreover, the mapping could be outdated before it is even finished. For example, it is uncertain how to do detailed mapping of aboveground biomass, forest structure and diversity of non-tree vegetation. It is also challenging to map forest naturalness class on all forest land.

Connecting earth observation data to separate data points from NFI:s is not possible because the data is not relevant for that purpose, as further described in the next section. This could lead to poor data quality and misunderstandings on the actual state of the forest, with the ultimate result of misguided initiatives on new forest policy and unwarranted sanctions on Member States.

SFIF urges the legislators to remove the indicators in Annex III. An expansion of the list of indicators can be considered in a revision of the legislation as part of the ordinary legislative procedure, to ensure that the added value, policy relevance and impact is thoroughly assessed and understood and that the cost is proportional to the potential benefit. It would be more suitable to promote collaboration between Member States to develop methodology that can advance or complement the NFI:s, and discuss the relevance and application of the acquired data.

3. Build a bottom-up framework based on National Forest Inventories

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. 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 is based. SFIF questions that the stated aim of ensuring high-quality monitoring can be reached with the proposed use of satellite data.

SFIF proposes that an EU forest monitoring framework is built "bottom-up", where the Member States are responsible for gathering and providing data used for official statistics on forest indicators. National Forest Inventories should be the basis for this, complemented with additional information gathered via satellite where appropriate. To ensure the quality and accuracy of forest information, the European Commission should always verify the data with the Member States prior to making it available in a forest information system.

A priority in the 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. Building on the existing European National Forest Inventory Network (ENFIN) should be further explored. The European Commission can also support the Member States by providing satellite data via the Copernicus programme.

NFIs use a statistical method based on samples from permanent and random monitoring sites to estimate the overall state of the forest. **SFIF emphasises that it is crucial for the credibility of the NFIs that the permanent monitoring sites remain confidential and that the inventory data is not misinterpreted. The integrity and continuity of the NFIs are more important than publication of geographically explicit raw data.** The integrity can only be safeguarded by reporting and publishing the aggregated results and not raw sampling data.

SFIF highlights that remote sensing is not a reliable data source for most of the proposed indicators and furthermore must be interpreted and verified nationally. 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)[1]. 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 variables only possible to obtain through ground observations. 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.

4. Refrain from including provisions for voluntary long-term forest plans

SFIF sees a value in EU facilitation of MS exchange, support and learning from each other on long-term goals and strategies for forests and best practices of preparing and implementing existing national forest programmes and strategies. However, **SFIF considers that provisions for long-term forest plans are misplaced in a binding instrument such as a Regulation.** While support could 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 of the Member States and respond to the local environmental, social and economic needs and circumstances.

The Swedish NFI

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.

[1]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.

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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