

THE ROYAL SWEDISH ACADEMY OF AGRICULTURE AND FORESTRY

Comments on

EU forests – new EU Framework for Forest Monitoring and Strategic Plans

Initiative EU forests – new EU Framework for Forest Monitoring and Strategic Plans

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The Royal Academy of Agriculture and Forestry (KSLA) welcomes the opportunity to respond to the call for evidence for an impact assessment on a new EU Framework for Forest Monitoring and Strategic Plans.

- Strategic forest planning is a national competence and therefore KSLA has doubts regarding the proposed strategic forest plans.
- An impact assessment should clarify in which areas harmonized EU-level data are needed, what the data are needed for and where the potential information gaps lie.
- EU should focus on capacity building in Member States (MS) on existing monitoring, before building new systems.
- Remote sensing should be further developed as a tool for monitoring among MS but must be calibrated and supplemented with extensive ground observations.

There is a great need for reliable and comparable data on EU forests. However, forest conditions vary widely within the EU and national data and monitoring varies between MS. EU Forest monitoring should be limited to data needed for monitoring progress of EU policies at EU level. Thus, the issue of providing data for forest management should be handled separately at MS level. KSLA supports the Council conclusions on the new EU Forest Strategy: "CALLS on the Commission, together with the MS and experts to analyse the currently existing discrepancies and possible gaps in forest data collection" and regarding strategic plans "ASKS FOR clarifications on the added value of such plans and RECALLS the need to acknowledge the cost-effectiveness and to avoid duplication and additional administrative burden, the already existing comprehensive national forest programmes or strategies, developed according to internationally agreed commitments, such as the United Nations Strategic Plan for Forests and the FOREST EUROPE Vienna Resolution, and their related MS competencies."

The forest data that are needed for monitoring forests on EU level need to be carefully assessed before any new, costly, monitoring program is developed. This is a key issue for the impact assessment. Before calling for general harmonization and to create a basis for comparable data, it is necessary to identify the areas where harmonization is needed, the purpose of such harmonization, which data are needed and with which resolution. In

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addition, the question of financing of data collection and monitoring and the respect of data privacy must be addressed. This should be done in a way that does not increase administration and costs in MS. Cooperation with UNECE, FAO and Forest Europe, which also collect forest data, is necessary.

A likely starting point for the framework would be to make sure that all MS have sample plot based National Forest Inventory (NFI) that delivers harmonized data for a core set of key variables. A priority in the upcoming legislative framework should be to support MS in developing NFIs to achieve better quality data and facilitate knowledge-sharing and harmonization between MS.

The use of natural resources, including forests, needs to rest on a solid basis of evidence and experience. As such, the proposal to increase insights in the state of EU forests is positive. Still, the proposed approach focusing on remote sensing will likely have a limited contribution, in relation to already existing initiatives. KSLA foresees a use mainly in relation to rapid processes, such as transnational forest fires and storms, for which there is a need for immediate mapping to counteract negative ecological, social, and economic effects. The development of satellite-based GIS systems is currently rapid. However, it is important to realize that these have their limitations and that they must always be calibrated with ground-based measurements. The benefits of satellite data products are high resolution in space and time, however at the cost of limited accuracy for most forest variables. It is therefore essential that the obtained accuracy is documented for any product based on satellite data.

To KSLA's feedback on the internet: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13396-EU-forests-new-EU-Framework-for-Forest-Monitoring-and-Strategic-Plans/F3255549 en