



17 November 2023

Mr. Virginijus Sinkevičius
Commissioner for the Environment,
Oceans and Fisheries
European Commission

Dear Commissioner Sinkevičius,

We are writing in view of the upcoming proposal on forest monitoring. We appreciate the dialogue we have had with the Commission and your team, as these issues are of great political importance to our two countries and continue to be so also in the future.

Sweden and Finland have a long history of forest monitoring. We are also playing a leading role in international reporting on forests. This is due to the developed systems, knowledge, and expertise on forest monitoring that we have built up over the years. For Sweden and Finland it is therefore important that our national forest monitoring systems can prevail and that we avoid unnecessary costs and double reporting. Reporting under the regulation should be directly linked to requirements in existing EU legislation and not go beyond those.

We are particularly concerned about the two indicators on "location of forest habitats" and "location of primary and old growth forest". These two indicators would go beyond existing legislation and what would be necessary in an EU regulation on forest monitoring. They should therefore be removed as indicators, in particular since they would imply very high costs to report in a scientifically reliable way.

We also have concerns on the multitude of new indicators that could be introduced via delegated acts. We see that this delegation of power goes beyond a mere technical specification and includes high level of uncertainty.

Please find below drafting suggestions on these issues:

Priority amendments and rationale

1. Deletion of the indicators “location of primary and old growth forest” (art. 5.3 and annex II k) and “location of forest habitats outside Natura 2000 sites” (annex III, e)

Rationale: These two indicators would go beyond existing legislation and what would be necessary in an EU regulation of forest monitoring. They should therefore be removed as indicators, in particular since they would imply very high costs to report in a scientifically reliable way.

2. Restrictive use of delegated acts, art. 8 (and corresponding annex III) should be deleted

Rationale: in a forest monitoring system, technical specifications are fundamental. Changes according to Art 8 and the indicators in annex III are more suitable to handle through a review of the regulation, due to the high uncertainties.

3. Deletion of “monitoring site level” throughout the regulation (annex II)

Rationale: We understand this requirement as the unit where the data was collected. Due to statistical confidentiality, the location of sample plot cannot be revealed as this would affect the reliability of data. There’s neither any value of reporting information on forest for a single plot, the purpose of using samples plots is to enable statistically reliable estimations on an aggregated level. Also in other parts of the regulation, references are made to including geographically explicit information, which is problematic for the same reasons.

4. Deletion of Art. 14 on voluntary integrated long-term planning.

Rationale: A regulation is not a suitable mean for encouraging MS to voluntarily share information on plans. A baseline of common elements or similar only adds to the concerns raised. At the minimum, the regulation should apply to new plans only and not include a reference to 10-30-50 years perspective or any other “minimum” elements.

Yours sincerely,



Peter Kullgren

Minister of Rural Affairs

Sweden



Sari Essayah

Minister of Agriculture and Forestry

Finland