Hatchet Job on the Forest Monitoring Law - What Next?

Policy briefing, Tuesday 16th September 2025

CONTENTS / REPORT AT A GLANCE

Summary

This Briefing analyses the current situation on negotiations for an EU Forest Monitoring Law (FML), and what has brought us to the disappointing situation we now have - that the Council and Parliament are proposing to drastically weaken the European Commission's proposal for science-based monitoring. This Briefing should be useful for MEPs, who have yet to finalise and vote on the Parliament's position, and anyone else interested in how policymaking is currently undertaken on the EU's biggest land-use, forests.

Drafted by NGOs and scientists, this briefing summarises how Council and Parliament have proposed to weaken the FML and analyses their failure to take a more constructive approach. **We conclude by urging MEPs to rescue the FML by significantly improving the Parliament's text, which would keep alive the possibility of a valuable outcome during trilogue**. Such a

turnaround would show that MEPs understand the centrality of accurate scientific information to the sustainable management of forests upon which not just the forest industry, but all of society, depends.

Given the story so far, it looks unlikely that MEPs will agree on an acceptable draft of the FML. In this case, the European Commission may be compelled to withdraw its proposal because a poor FML would be worse than no FML. The EU must not officialise a myopic approach that largely ignores satellite data and obscures and whitewashes key information on forest use, resilience, and biodiversity. Policymakers, scientists, and the public need this information when considering future actions to reduce the impacts of heat, drought, flooding and fire, safeguard our carbon sinks and wildlife, and maintain a viable forestry sector.

A Forest Monitoring Law for modern times

Recognising the multiple risks forests face during a century of climate change, the European Commission (EC) released a proposal in November 2023 for a monitoring framework for European forests (the "forest monitoring law", FML). The FML aims to set up a system of high-quality monitoring that 1) helps achieve biodiversity and climate targets, 2) improves risk assessment, preparedness, and crisis response, and 3) supports evidence-based decision-making.

By 2100, climate change could reduce the economic value of European forests by up to 50%,[1] making monitoring central to the economic future of the forest industry. The FML would bring forest monitoring into the modern age. Member States' national forest inventories (NFIs) currently rely on ground-based measurements of forest attributes at sampling plots, an approach that generates useful information but that is limited spatially and temporally and is mainly oriented around indicators relevant to traditional economic forestry rather than biodiversity and ecosystem resilience.[2] The FML proposes to integrate continuously generated and spatially comprehensive satellite data with the ground-based NFI data to create a Geographical Information System (GIS) that organises and serves up data on forests across the Member States. The FML would mandate data collection for indicators of forest health that go beyond those typically collected in the NFIs, including on biodiversity, and would standardise those metrics across the EU.

The science community is calling out for better, more accurate data. Seventy-eight scientists recently wrote an open letter recognising the need to modernise data collection and calling for the integration of satellite monitoring with ground surveys in the FML.[3] The Joint Research Centre considers that "*high-resolution satellite imagery, combined with airborne data and ground observation networks, are essential for monitoring EU forests in a timely manner. Currently, many EU countries rely mostly on periodic forest inventories, which are not sufficient to keep up with the rapid pace of declining forest health*."[4]

Fig. 1. Flooding in Romania, July 2025. The right-hand image shows felled timber swept up by flood waters. Source: Mihai Goțiu (2025).[5]

The need for comprehensive monitoring of forest cover and condition has been repeatedly demonstrated in practical terms. As of mid-2025, flash-floods in Romania in a region with intensive and possibly illegal logging have killed two people and caused hundreds to be evacuated. Figure 1 shows a large volume of felled timber caught up in the flood water. Deforestation as well as the hydrological impacts of forest-fires also likely contributed to Valencia's catastrophic 2024 flooding in which at least 231 people died.[6] Forest-fires are increasingly extreme and deadly: in 2017, Portugal suffered 117 mortalities – including 64 people in a single fire.[7] This year (2025) was another record year for wildfire.[8] Such tragedies are becoming more frequent, emphasising the need for better monitoring and early warning systems.

How the Council & European Parliament proposals weaken the FML

The Council of the EU and Parliamentary rapporteurs have both drafted their preferred versions of the EC's proposal – the "General Approach",[9] and the "Draft Report", respectively. The rapporteurs of the Draft Report have also drafted "compromise amendments" (CAs).[10] Both co-legislators have moved to seriously weaken the EC's proposal, to the point the EC has threatened to withdraw its proposal if co-legislators do not strengthen their positions.[11] Annex 1 provides an overview of the amendments proposed by the Council and Parliament and how they weaken the FML; the main themes are addressed below.

Removing the requirement for Member States to improve reporting

Parliament wishes to make all data sharing by Member States voluntary, risking an outcome riddled with reporting gaps as in the voluntary monitoring programme of Forest Europe.[12] The Council limits the scope to data already collected in NFIs. Instead of improving forest monitoring across the board, the FML would be weakened to a lowest common denominator by only "supporting Member States to reach a common minimum level of development of their national forest inventory" (CAs).

Removing satellite-mapped data

The Council and Parliamentary proposals eliminate a key element of the FML's added value by removing the collection of satellite data from the EU's Copernicus programme. They propose either to delete the majority of satellite indicators entirely or render them optional and far less useful.

The Council proposes to almost totally remove the role of the EC in collecting satellite data, deleting the majority of satellite indicators. Three satellite indicators are converted into indicators for Member States to collect (it is unclear how) at coarse spatial resolutions (nationally or regionally, compared to the EC's 10-meter satellite accuracy) and slow timescales (one to six yearly, compared to the EC's real-time monitoring).

Parliament's proposal removes all non-fire-related satellite indicators from being collected by the EC, making them indicators for Member State collection (again, it is unclear how). Member States can opt into receiving satellite data from the EC (which means many won't), but then only at a much-weakened spatial resolution (entire regions) with data collection occurring only every five years.

Removing nearly all indicators on biodiversity & resilience

Forest biodiversity and resilience are closely related and are both declining in the EU. The Parliament and Council proposals both delete indicators related to biodiversity, including *Threatened species*, *Diversity of non-tree vegetation, Forest naturalness classes, Location of [important] forest habitats outside Natura 2000 sites, Forest structure,* and *EU Forest type*.[13] They also remove obligatory mapping of priority forest habitats, instead requiring only summary statistics on the total area of *Protected forest areas* and *Primary and old-growth forest*. The Council's proposal deletes mapping of *Invasive species*, and Parliament's version reduces the indicator to a mere summary list of species. The proposals delete the requirement for mapping *Tree species composition and richness* and *Deadwood volume*, instead requiring only reporting of national or regional averages.

It may be no coincidence the only biodiversity indicator to survive unweakened in the Council's proposal is *Common forest birds* - the indicator least likely to show the adverse impacts of intensive forestry because it focuses on *common* birds that can survive in a variety of habitats, as opposed to threatened forest birds that require more natural forests. The Parliament's proposal, however, delays reporting even this indicator by categorising it amongst those subject to a "step-wise approach" via implementing acts, thus introducing the need for an impact assessment.

Removing or weakening indicators of forest disturbance, including logging

Eighty-two percent of forest disturbance in the EU is due to harvesting.[14] The EC proposal includes *Tree cover density* as a satellite indicator with daily scanning to a 10m resolution or finer. This can track the removal of individual trees and makes it possible to monitor illegal logging.

In stark contrast, Parliament and Council propose to remove all elements that indicate harvesting. The Council proposes to delete the *Tree Cover Density* indicator, and Parliament

weakens it to a five-yearly regional average. The Council maintains an indicator, "*Forest disturbances caused by factors other than fires*", but words it in such a way that harvesting is not included. The Council also deletes *Removals* (i.e. volume of harvest), indicators related to forest fire, and *Tree cover disturbances*, *Defoliation, and Stand structure* - the deletion of which also obscures the differences between plantations and natural forests.

By removing key information on forest structure and biodiversity, opponents of a strong FML are making it much more difficult, if not impossible, to efficiently direct funds to foresters looking to improve their management practices. Under Council or Parliament's proposals, landowners would not be able to demonstrate and be rewarded for forest management that promotes biodiversity or carbon storage.

Removing indicators on disaster risk preparedness & recovery

The Council proposal deletes all three indicators for *Wildfire risk assessment*, as well as three indicators on the severity, impact, and recovery of forests after fire. These are serious omissions given forest types vary in their fire risk (industrialised forests can be particularly fire-prone[2]). It is especially worrying given the record wildfire seasons the EU is experiencing, including this year. On Sept 2nd, 2025, *"the area affected by fires has reached 986,070 ha. This value is higher than the average of 292,936 ha recorded for this time of year over the past 19 years"*.[15]

Weakening indicators on the use of wood for bioenergy

Under the Climate Governance Regulation (EU 2018/1999), Member States are required to report the total amount of wood biomass used for energy production, broken down into categories of forest wood, wood industry residues, and post-consumer wood.

The EC's proposal requires these data to additionally be broken down by user category, including energy producers, households, and other sectors. Collecting such information would allow for a reliable, data-based assessment of the impact of the growing demand for wood on forest habitats and carbon sequestration, and the availability of wood for other sectors of the "bioeconomy". However, the Council proposes to remove the requirement for user category reporting.

Removing long-term forest planning

The EC proposal encourages Member States to develop *integrated long-term forest plans* that consider forestry, the bioeconomy, biodiversity, climate change, and disaster risk management. Having already pressured the EC to make these plans voluntary rather than compulsory, Member States now wish to delete all mention of integrated planning under the logic that "national forest plans and/or strategies should remain under the competence of the Member States",[16] which they anyway would be.

Forest ecosystem services can compete with one another – for example, logging natural forests and intensive rotational forestry limit the forest carbon sink and harm biodiversity. Member States do not generally communicate whether or how they seek to balance these interests. A case-study of Finland found significant incoherence between the objectives of the National Forest Strategy (which includes harvest targets), the Bioeconomy Strategy, and the Biodiversity

Strategy, finding that multiple ecosystem services would be optimised by expanding the area of continuous-cover forestry (i.e. changing forestry methods) and protected forest areas.[17] Discouraging long-term planning perpetuates continued policy dysfunction.

What Parliament & Council's dismantling of the FML proposal means for forests

If EU policymakers adopt the seriously weakened FML proposals of the Council and Parliament, this will lead to

- Increased risk to communities from fires & flooding
- Increased forest damage due to lack of spatial data & early warning systems
- Lower transparency on how forests are managed
- No localised mapping of forest data, only aggregated statistics
- Infrequent updates that lag behind forest changes
- Undermining Biodiversity Strategy targets by failing to map primary & old-growth forests & monitor forest biodiversity
- Failure to monitor how logging affects forests, including primary & old growth
- Failure to monitor illegal logging
- Lack of information needed to implement & report under laws & strategies
    - e.g. Nature Restoration Law, Renewable Energy Directive, LULUCF Regulation, EU Deforestation Law, Carbon Removals & Carbon Farming.[18]

Why do Parliament and the Council want a weak FML?

The usual claims about competence, subsidiarity & costs

Member States often argue that the EC has a limited role with regard to national forest policy. However, the Treaty on the Functioning of the EU is clear that environment is an area of shared competence (Arts. 4 & 191), which the European Court of Justice has particularly confirmed with regard to forests.[19]

Shared competence is appropriate because forests are transboundary entities both physically and in terms of the ecosystem services they provide (e.g. habitat, aquifers, keeping rivers flowing, cloud formation, carbon uptake). Problems are also transboundary, such as forest fires, smoke and carbon emissions, invasive species and pests, and the impacts of forest degradation on water scarcity, heat-stress and flooding.

Forestry contributes €25 billion (0.17%) of GVA in the EU,[20] whereas wider ecosystem services from our forests (habitat, support for non-human life, carbon sequestration, flood control, support for pollinators, water purification and recreation, to name a few) can literally not be accurately valued. The costs of damage from climate change or unsustainable forestry to forests and their services are spread across the whole of society, including the agriculture sector.

Citizens pay a high price when forests deteriorate. Specific impacts to localities may arise from hydrological impacts (pollution of rivers, sinking groundwater, increased floods, droughts and extreme rain events); increased risk of fire due to flammable monocultures;[21] negative impacts of clear-cuts on health and wellbeing and attractiveness to tourists (costs that can exceed the value of harvesting);[22] reduction of prized wild foods; and even threats to entire ways of life.[23] Costs are incurred from loss of life and property (to floods and fire), increased insurance costs, reduced asset values (e.g. property prices); devaluation of investments (including of forest stands), and flooding the market with low-priced salvage timber after die-back episodes.[24] For Southern Europe, an average wildfire season is estimated to cause a yearly productivity loss of €13–21 billion.[25]

Despite the need to monitor and prepare for such impacts, Parliament and Council have argued that the FML would be costly to implement and that its additional value is unclear. In fact it is the Council's own proposals to eliminate comprehensive satellite monitoring that most diminish the added value of the FML, by eliminating its ability to provide real-time forest data in a cost-effective way. The FML would not be a cost burden but could help the EU and Member States to save billions each year.

Anti-environment politics & forestry lobbying

The mood in the EU Parliament has been aggressive towards environmental legislation, from delaying the Deforestation Regulation to downgrading the protection status of wolves.[26] Right and extreme-right-wing parties – EPP, ECR and PfE – reportedly wish to "abolish 100% of the [FML] proposal".[27] In recent days, MEP discussions on amendments have broken down, with EPP doubling down on their position of seeking only further weakening amendments, or a collapse in the process.[28] By only supporting further weakening of the FML or its collapse, EPP are once again impeding environmental policymaking, though in reality it hardly matters at this point as the Parliamentary draft is far from acceptable. The rapporteurs hope to call on reasonable EPP policymakers to continue to engage, but to be worthwhile this would need to involve support for amendments that are based in science (see below).

Even prior to discussing compromise amendments, the rapporteurs' Draft Report was an exercise in "returning the power over the collection of forest information to the member states", by limiting the FML's scope to forest industry-oriented data already collected by NFIs (see Annex 1).[29] The Rapporteurs declared they had received input from 25 organisations, with NGOs outnumbered by forest industry representatives by more than three to one (5 were environmental NGOs and at least 17 represented the forestry sector and NFI network[30]).

Agriculture ministries primarily value forests for wood production

The vast majority of the EU's forests are used for timber production,[31] including even many so-called "protected" forests in the Natura 2000 network. Thousands of hectares of the EU's last old-growth forests are logged each year.[32] In much of Europe, including Sweden, Finland, Portugal, Latvia, and southwest France, forestry emphasises clear-cutting followed by scarification (essentially ploughing) and replacement of more diverse forests with monocultures[33] that are fundamentally tree farms rather than ecosystems that can support a diversity of species.

It is agriculture ministries that are typically in charge of forestry at the Member State level. They tend to work closely with the forestry sector, especially in countries with a proactive forestry industry such as Sweden and Finland. The proximity of agriculture ministries to the intensive forestry sector, including on decisions of funding, has been heavily criticised (see Annex 2 for examples).

In the Council of the EU, it is the AGRI-FISH configuration – where the 27 agriculture ministries convene – that ran the discussions on the FML.[34] This was despite the Spanish presidency scheduling the first discussion in the Environment Council (ENVI) in Dec 2023. The subsequent Belgian presidency chose to give leadership of the file to AGRI-FISH. Officially, AGRI-FISH presided over an "ad-hoc joint working party",[35] giving the impression that environment ministries of the ENVI configuration were involved, but in reality only a handful of environment attachés participated in negotiations,[36] with discussions held in the Council's Working Party on Forestry. Overall, the Council process was dominated by forestry interests, with very little representation by policymakers with environmental competence.

Austria, Finland, Sweden, Latvia and Slovenia are members of the *For Forests* group. This is an alliance of agricultural ministries that openly advocate for the forestry sector.[37] This group led opposition to the FML, at times supported by Croatia, Czechia, Lithuania, Portugal, Romania and Slovakia.[38] Their positions closely resembled those of forestry lobbyists.[39]

The *For Forests* group continues to "*question the necessity of a legal act*" and are still calling for the law to be dropped entirely, despite significant weakening of the EC's proposal in the General Approach. Failing that, they declare a further "*need to delete individual indicators such as primary and old-growth forests.*"[40] That is, not only do they wish to avoid mapping the EU's most iconic forests, they don't even want to provide summary statistics on the total area of such forests in each country. This suggests these Member States are not serious about the EU Biodiversity Strategy goal to map and fully protect all remaining primary and old-growth forests, an objective to which they have committed.[41]

Can the FML be rescued?

The Council and Parliamentary work on the Forest Monitoring Law has so far been a hatchet job – a long process of chipping away at the Commission's proposal and ultimately eliminating everything of value. A major volte-face would be required to rescue the FML by returning to the EC's original proposal, or close to it.

To rescue the Forest Monitoring Law, each of the following would need to happen: MEPs in Parliament's Environment Committee would need to propose and agree on amendments that strengthen the file considerably, Parliament would have to approve these, and then trilogue discussions with Council and the Commission would have to persuade the Council to agree on a final text radically stronger than their General Approach.

Minimum requirements for a science-based FML

Should MEPs (e.g. from Renew, S&D and science-based EPP members) wish to rally in support of a strong FML, the Commission has outlined four minimum requirements to make an FML

worth having.[42] The following headings paraphrase those requirements; text in italics denotes what a meaningful FML would look like.

1. Inclusion of satellite monitoring

All the EC's satellite indicators set out in Annex 1 of the proposal should be retained, as Copernicus delivers up-to-date information accurate to 10m, providing greater transparency and the benefits of world-leading technology. There is no sound reason not to take advantage of this service, which EU citizens have already paid for. To ensure optimal accuracy, and added value beyond current monitoring, satellite data should be calibrated with data from ground monitoring. Member States should be obliged to submit calibration data.

2. Mapping of forests & forest data across the EU

Mapping is needed of all the satellite indicators (e.g. forest type, defoliation, forest fires, etc) as well the indicators on biodiversity and resilience (see point 4, below). Without mapping, we can't develop warning systems because we will not have data on which areas and types of forest are proving most or least resilient to disturbances such as pest outbreaks, wind and fire; we can't know whether key habitats are being logged or degraded (EUDR); and we can't accurately assess the extent to which LULUCF and NRL targets are being met.

3. High resolution data & high frequency of data collection

As in the EC's proposal, the resolution of indicators should depend on practicalities for each indicator and be determined by technical experts. NFIs generally aggregate data to scales of NUTS 2 (large regions) and NUTS 3 (small regions), both of which fail to deliver the resolution necessary to address today's problems. It is also insufficient to wait five or six years for data updates, as would be the case for most indicators. For example, Council and Parliament both propose to provide a summary statistic on the amount of primary and old-growth forest (but with no mapping), seemingly only once rather than with regular updates, by Jan 2030 – potentially masking four more years of logging in these areas and failing to track the data thereafter.

4. Inclusion of *resilience, biodiversity & ecosystem services* indicators required by EU legislation

- *Location of primary and old-growth forests**
- *Protected forest areas*△
- *European forest type*
- *Deadwood*△
- *Forest disturbances caused by factors other than fire*△
- *Aboveground biomass*^
- *Carbon – including below ground*^△
- *Forest and canopy structure*
- *Location of forest habitats outside Natura 2000 sites*▲
- *Forest naturalness classes*⇿
- *Diversity of non-tree vegetation*

- *Tree species composition & richness*
- *Threatened species*⧋*

Co-legislators must ensure the FML includes the metrics needed to track agreed commitments on the EUDR↭, NRL▲, RED⧋, LULUCF^, Biodiversity Strategy* and Convention on Biological Diversity*.

Conclusions

The Council of the European Union and the European Parliament have gutted the EC's proposal for forest monitoring, despite this information being critical to communities vulnerable to flood, fire and heat-stress, as well as to the majority of the EU's wildlands flora and fauna dwelling in forests that are threatened more than ever by logging and climate change.

It currently appears unlikely that Parliament will come up with a draft worth taking to trilogue negotiations. If the Parliament's draft fails to meet the four tests outlined above, the European Commission must ensure that we do not end up with an FML that essentially whitewashes forest data used in policymaking.

If the 4 minimum requirements are not met:

- MEPs should not support a weak Parliamentary text
- The EC may have to choose the least-worst outcome & withdraw the proposal
- The Commission could work with JRC, EEA & others to integrate Copernicus & NFI data into the Forest Information System for Europe

If Member States and the Environment Committee indeed choose to obscure forest data (by limiting data collection to ground-based early 20th century methods, failing to monitor indicators on biodiversity and resilience, and shrouding results in aggregated summary statistics) these obfuscations will be exposed by scientific enquiry. In recent years the high intensity of forestry in the EU (and increasing harvest rates) and declines in tall forest extent, [43] continued logging of old-growth forests,[44] decreases in forest carbon sink,[45] poor condition of priority habitats,[46] and very low forest naturalness,[47] have become clear. As monitoring techniques continue to develop, attempts to hide national trends will increasingly be exposed.[48]

However, meanwhile the EU would not be collecting the data it needs for proper implementation and revision of numerous forest-related legislation and policies, and the resilience of EU forests, and therefore communities, will suffer. Therefore, either MEPs must support improving amendments in the coming weeks, or failing that, a less political, purely scientific approach is needed, in which the Commission works to strengthen existing information collection systems.

The benefits of a strong FML are clear.[49] No one benefits from watering down the EC proposal and obstructing data collection on forest disturbances and ecosystem health – not the public, and not the forest industry. Everyone benefits from modernised, accurate environmental information that ensures forests are managed sustainably.[50]

Annex 1. Summary of Parliament & Council amendments to the EC's FML proposal

EC's proposal (cols.1&2), Council's General Approach (cols.3&4), Parliament's Draft Report (DR) (cols. 5&6) & compromise amendments (CAs) (where CAs changed compared to the DR, CAs are cited). This is not an exhaustive list of amendments. Amendments that severely weaken the FML are in red, those that water it down are in bergundy. An = Annex, MS = Member State, NUTS 2 = large regions, NUTS 3 = small regions (Chat GPT considers an average NUTS 3 region to contain 300-700 municipalities).

Location in proposal	EC FML proposal indicators	European Council's General Approach (GA)	Location in GA	Parliament's DR & subsequent CAs	Location in DR/CA
GIS system Art. 4	**Geographically explicit information system for forest units**	**Deleted**	N/A	**Weakened**: retains some basic capability but deletes indicators that would populate the GIS (below). Deletes Art.4.3 specifying "precise mapping and localisation of forest areas".	Art. 4
EC satellite data Art 5.2/An 1	**Forest area** (10m or finer)	**Weakened** from an EC-collected satellite indicator to a MS-collected indicator (unspecified if ground survey or satellite). Annual, NUTS 2	Art 5, An 2	**Weakened** from an EC-collected satellite indicator to a MS-collected indicator (unspecified if ground survey or satellite). 5 yearly, NUTS 3. Allows MSs to opt into EC satellite data collection *if* they wish.	Art 5(3), An 2
Art 5.2/An 1	**Tree cover density** (10m or finer)	**Deleted**	N/A	**Weakened** from an EC-collected satellite indicator to a MS-collected indicator (unspecified if ground survey or satellite). 5 yearly, NUTS 3. Allows MSs to opt into EC satellite data collection *if* they wish. Renamed, "Tree Crown Cover".	Art 5(3), An 2
Art 5.2/An 1	**Forest type** (broadleaf/conifer/mixed) (10m or finer)	**Weakened** from an EC-collected satellite indicator to a MS-collected indicator (unspecified if ground survey or satellite). Annual, NUTS 2.	Art 5, An 2	**Weakened** from an EC-collected satellite indicator to a MS-collected indicator (unspecified if ground survey or satellite). 0.5 Ha, 5 yearly. Allows MSs to opt into EC satellite data collection *if* they wish.	Art 5(3), An 2
Art 5.2/An 1	**Forest connectivity** (10m or finer)	**Weakened** from an EC-collected satellite indicator to a MS-collected indicator (unspecified if ground survey or satellite). Unclear but possibly only national scale (defers to NRL, 6 yearly).	Art 7, An 3a (new)	**Weakened** from an EC-collected satellite indicator to a MS-collected indicator (unspecified if ground survey or satellite). National stat. (EC to share via FISE)	Art 7
Art 5.2/An 1	**Defoliation** (300m, 2 weekly)	**Deleted**	N/A	**Deleted / weakened** - CAs delete as an EC-collected satellite indicator, allowing MSs to opt-into EC data collection *if* they wish, but at 5 yearly, NUTS 3.	Art 5(3), An 2
Art 5.2/An 1	**Forest fires:**	***Weakened** (see next rows)*	Art. 7 An 3a (new)	**Kept** as EC Copernicus capability	An 1
Art 5.2/An 1	***Fire events***	**Kept** (as EFFIS reporting)	Art. 7 An 3a (new)	**Kept** as EC Copernicus capability	An 1
Art 5.2/An 1	***Burnt forest areas***	**Kept** (as EFFIS reporting)	Art. 7 An 3a (new)	**Kept** as EC Copernicus capability	An 1
Art 5.2/An 1	***Fire severity***	**Deleted**	N/A	**Kept** as EC Copernicus capability	An 1

Art 5.2/An 1	***Post-fire soil erosion***	**Deleted**	N/A	**Kept** as EC Copernicus capability	An 1
Art 5.2/An 1	***Post-fire event recovery***	**Deleted**	N/A	**Kept** as EC Copernicus capability	An 1
Art 5.2/An 1	**Wildfire risk assessment:**	*Deleted (see next rows)*	N/A	Kept as EC Copernicus capability	An 1
Art 5.2/An 1	***Dead-fuel moisture content***	**Deleted**	N/A	Kept as EC Copernicus capability	An 1
Art 5.2/An 1	***Live-fuel moisture content***	**Deleted**	N/A	Kept as EC Copernicus capability	An 1
Art 5.2/An 1	***Fuel type map***	**Deleted**	N/A	Kept as EC Copernicus capability	An 1
Art 5.2/An 1	**Tree cover disturbances** (10m or finer)	**Deleted**	N/A	**Removed** from EC satellite service, to a MS indicator. Changed to *Forest damages*. 5 yearly "description" [national?] of damage types [no quantification at all?]	Art 5(3) / An 2
Member State data Art 5.3/An 2	**FAWS / NFAWS** (NUTS 2, annual)	**Weakened** to "compliant with" Dir on European Economic Accounts (i.e. national summary data in thousands of Ha). Annual, share of (NUTS 2)..		**Moved / delayed** to "stepwise" Annex 3	Art 3a / An 3
Art 5.3/An 2	**Growing stock volume** (NUTS 2)	**Kept**	(Art 5), An 2	No amendments, presume intact	(Art 3a / An 3)
Art 5.3/An 2	**Net Annual Increment** (per Ha ave, NUTS 2, 5 yearly, per EU forest type)	**Kept**, but not per European Forest Type	Art 5, An 2	**Kept**, but not per European Forest Type	An 2
Art 5.3/An 2	**Stand structure** (monitoring site level, 5 yearly)	**Deleted**, replaced by *Share of forests with uneven aged structure* - defers to Forest Europe, only a national percentage	Art. 7 An 3a (new)	No amendments, presume intact	(Art. 5.3 An 2)
Art 5.3/An 2	**Tree species composition & richness** (monitoring site level, 5 yearly)	**Weakened** to NUTS 2 (also 5 yearly)		**Weakened** to Forest Europe's *Tree species diversity* (ave number of species, & to national summary stats, 6 yearly) & moved to "stepwise approach" (Annex 3a) subject to impact assessment	Art 7 / An 3a
Art 5.3/An 2	**European Forest Type** (monitoring site level, 5 yearly)	**Deleted**	N/A	**Deleted**	N/A
Art 5.3/An 2	**Removals** (national, annual)	**Deleted**	N/A	Kept (EC to share via FISE)	Art 7 / An 3a (new)
Art 5.3/An 2	**Deadwood** (monitoring site level, 5 yearly)	**Weakened** to NUTS 2, though improved to annual	Art 5, An 2	**Weakened** to national, 5 yearly stats, & moved to "stepwise approach" (Annex 3a) subject to impact assessment	Art 7 / An 3a (new)
Art 5.3/An 2	**Location of forest habitats in Natura 2000 sites** (1:25,000 mapping or finer)	**Weakened** to "area of"	Art. 7, An 3a (new)	**Deleted** (CAs)	
Art 5.3/An 2	**Abundance of common forest birds** (index, 3 yearly)	Reworded to *Common forest birds index*	Art. 7, An 3a (new)	**Weakened** to 6 yearly, & moved to "stepwise approach" (Annex 3a) subject to impact assessment - risk of further weakening? Renamed, *Common forest bird index*.	Art 7 / An 3a (new)
Art 5.3/An 2	**Location of primary and old-growth forests** (1:25,000 mapping or finer)	**Weakened** to "area of" (NUTS 2, seemingly a one-off "data shared by 2030 - potentially masking 4+ more years of logging)	Art 5, An 2	**Weakened** to "area of" as a national summary statistic, seemingly a one-off "data shared by 2030 - potentially masking 4+ more years of logging)	Art 5 / An 2

Art 5.3/An 2	**Protected forest areas** (1:25,000 mapping or finer, annually)	**Weakened** to "area of" (NUTS 2)	Art 5, An 2	**Weakened** to "aggregated" summary statistics, not mapped	An 2
Art 5.3/An 2	**Production and trade of wood products**	**Kept**	Art. 7, An 3a (new)	**Kept**.	Art 7 / An 3a (new)
Art 5.3/An 2	**Forest biomass for bioenergy**	**Weakened**, keeps the total volumes but removes by user categories (*Energy producer as main activity, Autoproducers, Households, other sectors*)	Art. 7, Ann 3a (new)	**Kept**, but moved to Annex 3a (step-wise), subject to impact assessment & potential weakening?	Art 7 / An 3a (new)
Additional forest data (stepwise) Art 8/An 3	**Forest disturbances caused by factors other than fire**	**Deleted**		**Weakened**. Moved from "step-wise" Annex 3 to EC responsibility (Annex 1) - MSs to verify and provide annual reports on, wording lists only "natural disturbances" - *does not include logging.*	Art 5 / An 1
Art 8/An 3	**Aboveground biomass**	**Kept**, specified as NUTS 2	Art 5, An 2	**Deleted/postponed.** Referred to as one of the "new indicators" the EC is "empowered" to establish by delegated act after "finding new solutions", "in close cooperation with the MSs"	N/A
Art 8/An 3	**Forest structure**	**Deleted**	N/A	**Deleted/postponed.** Referred to as one of the "new indicators" the EC is "empowered" to establish by delegated act after "finding new solutions", "in close cooperation with the MSs"	N/A
Art 8/An 3	**Value of non-wood forest products**	**Deleted**	N/A	**Deleted/postponed.** Referred to as one of the "new indicators" the EC is "empowered" to establish by delegated act after "finding new solutions", "in close cooperation with the MSs"	N/A
Art 8/An 3	**Location of forest habitats outside Natura 2000 sites**	**Deleted**	N/A	**Deleted/postponed.** Referred to as one of the "new indicators" the EC is "empowered" to establish by delegated act after "finding new solutions", "in close cooperation with the MSs"	N/A
Art 8/An 3	**Forest naturalness classes**	**Deleted**	N/A	**Deleted/postponed.** Referred to as one of the "new indicators" the EC is "empowered" to establish by delegated act after "finding new solutions", "in close cooperation with the MSs"	N/A
Art 8/An 3	**Presence of invasive species** (mapping of)	**Deleted**	N/A	**Weakened** to a national list of invasive species, 5 yearly (as listed in Art 5 & Annex 2) or 6 yearly, spatial resolution blank (listed in Art. 7 & Annex 3a)	Unclear
Art 8/An 3	**Diversity of non-tree vegetation**	**Deleted**	N/A	**Deleted/postponed.** Referred to as one of the "new indicators" the EC is "empowered" to establish by delegated act after "finding new solutions", "in close cooperation with the MSs"	N/A
Art 8/An 3	**Threatened species**	**Deleted**	N/A	**Deleted/postponed.** Referred to as one of the "new indicators" the EC is "empowered" to establish by	N/A

				delegated act after “finding new solutions”, “in close cooperation with the MSs”	
Art 8/An 3	**Other wooded land** (mapping)	**Weakened** to NUTS 2 summary stats	Art 5, An 2	**Weakened** to NUTS 2 summary stats	
Voluntary integrated long term plans Art. 13 / An 4	MSs encouraged to develop "voluntary integrated long term plans", with sections on: *Biodiversity, Forest-based bioeconomy, Climate mitigation (C sequestration), Climate adaptation, Disaster risk assessment & management*	**Deleted**	N/A	**Weakened** by suggesting “planning” instead of concrete “plans”	Art. 13 An IV

Annex 2. The proximity of agriculture ministries to the intensive forestry sector

- Successive **Portuguese governments** have been heavily criticised in the book *Portugal in Flames*.[51] The authors not only critique the subsidies for private companies presiding over highly flammable eucalyptus plantations but also describe a "*porta giratória"* (revolving door) of senior staff switching between cellulose companies and the agriculture ministry to ensure policies and subsidies benefit corporations.

- **The German government** has been heavily criticised by forester-author, Peter Wohlleben: "all these billions of euros in subsidies are… propping up a rotten system far removed from nature – a system that would break down without this financial support".[52] Wohlleben explains that a private organisation, the *Agency for Renewable Resources (FNR)*, is responsible for administering funds and that its members include the federal Ministry of Food and Agriculture and the timber and forest industries: "in short, I believe what we have here is a kind of cash machine that draws up a list of needs, pushes for a majority vote, and then distributes the money acquired for the benefit of its own members". He considers "government handouts" to be "raining down on clearcuts" – with €500 million in 2020 alone spent replanting die-back affected spruce plantations that were vulnerable to attack due to being planted outside their natural range.

- The **current government in Sweden** has established a new organisation that is supposed to shape conditions for "sustainable" forestry, but all of its members are representatives of the forest industry.[53] This replaces the National Forest Programme established by a previous government which included civil society organisations.[54]

- **Governments are redirecting support intended for environmental improvement to intensive forestry**. For example, in **Poland**, 87% (551) of the 631 applications for support under the Common Agricultural Policy sub-measure "improving the resilience and environmental value of forest ecosystems" involved thinning in commercial forest stands, which "mainly aims to improve the economic value of the forest, not its environmental value'".[55]

---

[1] Hanewinkel *et al.* (2013). Climate change may cause severe loss in the economic value of European forest land. *Nature Climate Change* **3**, 203–207, https://www.nature.com/articles/nclimate1687

[2] WWF *et al.* (2024), *NGO paper: Benefits of a Forest Monitoring Law*. https://eeb.org/library/benefits-of-a-forest-monitoring-law/ See also: BirdLife & WWF (2025) *Severe wildfires in southern Europe: prevention & management through an integrated landscape-planning approach*. https://www.birdlife.org/wp-content/uploads/2025/07/FINAL-Wildfire-prevention-paper.pdf

[3] https://forwards-project.eu/wp-content/uploads/2025/02/Letter-of-EO-Experts.pdf

[4] https://joint-research-centre.ec.europa.eu/jrc-news-and-updates/european-forest-carbon-sink-declining-can-we-reverse-trend-2025-07-30_en

[5] Gotiu, M. (2025), Dramatic images and footage of the floods in Suceava and Neamț. What do you say, shall we cut down another forest? *România Curată* https://bit.ly/4mj3r2a (Image of falling house - original source, Romania's General Inspectorate for Emergency Situations. Image of logged timber in floodwaters, original source, Ioan Panainte).

[6] Cortiços & Duarte (2025), Climate Resilience and Adaptive Strategies for Flood Mitigation: The Valencia Paradigm. *Sustainability* **17**, https://www.mdpi.com/2071-1050/17/11/4980; WWF Spain (2024), Nothing natural about Valencia floods, https://bit.ly/44Y4Cyy

[7] https://eeb.org/library/benefits-of-a-forest-monitoring-law/

[8] https://www.theguardian.com/world/2025/aug/22/eu-wildfires-worst-year-on-record-as-season-continues

[9] Wiesner & Sargiacomo (rapporteurs) (Jan 2025), *DRAFT REPORT on the proposal for a regulation of the European Parliament and of the Council on a monitoring framework for resilient European forests*. https://www.europarl.europa.eu/doceo/document/CJ14-PR-766935_EN.pdf, & Council of the European Union (June 2025), *Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on a monitoring framework for resilient European forests - General approach*, https://data.consilium.europa.eu/doc/document/ST-10020-2025-INIT/en/pdf

[10] Wiesner & Sargiacomo (rapporteurs) (late August 2025). *Compromise amendments to Draft Report on Forest Monitoring Law*. Unpublished.

[11] https://data.consilium.europa.eu/doc/document/ST-10020-2025-ADD-2/en/pdf

[12] https://foresteurope.org/sustainable-forest-management/

[13] Parliament and Council prefer the less precise term *Forest type* (broadleaf, conifer or mixed) to *European forest type*. Under *Forest type*, a monoculture plantation (e.g. of Norway spruce) can be described as conifer forest, or a Eucalyptus monoculture can be called *broadleaf forest*. In contrast, under *European forest type*, plantations are identified separately from natural forests, thus assisting with realising goals set out in the Forest Strategy and Nature Restoration Law.

[14] Seidl & Senf (2024), Changes in planned and unplanned canopy openings are linked in Europe's forests. *Nature Communications* **15**, https://www.nature.com/articles/s41467-024-49116-0.pdf

[15]https://joint-research-centre.ec.europa.eu/projects-and-activities/natural-and-man-made-hazards/fires/current-wildfire-situation-europe_en

[16] See General Approach, III.27 (p.9)

[17] Blattert *et al.* (2022), Sectoral policies cause incoherence in forest management and ecosystem service provisioning. *Forest Policy and Economics* **136** https://www.sciencedirect.com/science/article/pii/S1389934122000016

[18] The JRC states: "greater transparency, standardization and timeliness in forest data generation and dissemination are needed to effectively track key European forest parameters, as foreseen by the proposal for a Forest Monitoring Law, and needed for the NRR, LULUCF and CRCF monitoring, reporting and verification". See: Migliavacca, M. *et al.*(2025). Securing the forest carbon sink for the European Union's climate ambition. *Nature* **643**, 1203–1213, https://www.nature.com/articles/s41586-025-08967-3

[19] European Court of Justice, joint cases C-164/97 and C-195/97 ECLI:EU:C:1999:99

[20] Eurostat (2024). Economic indicators for forestry and logging. *Forests, Forestry & Logging* https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Forests,_forestry_and_logging#Economic_indicators_for_forestry_and_logging

[21] https://www.birdlife.org/wp-content/uploads/2025/07/FINAL-Wildfire-prevention-paper.pdf

[22] Venter *et al.* (2025). Impacts of forest clear-cutting on recreational activity: Evidence from crowdsourced mobility data. *Landscape and Urban Planning* 258, https://www.sciencedirect.com/science/article/pii/S0169204625000398; Kellert & Wilson (1993), *The biophilia hypothesis, Island Press (p.92)*. Nesbakken (2024), How loss of nature through clear-cutting forestry affects well-being. *Health Promotion International*, https://www.sciencedirect.com/science/article/pii/S0169204625000398. "No-one wants to visit a clear-cut", https://www.naturturismforetagen.se/utan-skog-ingen-levande-landsbygd/

[23] Including of the Sámi people, forest dependent communities, and all who cherish forests. Östlund & Norstedt (2021), Preservation of the cultural legacy of the indigenous Sami in northern forest reserves – Present shortcomings and future possibilities. *Forest Ecology and Management* vol. 502 at https://doi.org/10.1016/j.foreco.2021.119726 Also, https://wwf.ro/wp-content/uploads/2023/05/Forest-Dependent-Communities.pdf

[24] https://eeb.org/library/benefits-of-a-forest-monitoring-law/

[25] https://www.birdlife.org/wp-content/uploads/2025/07/FINAL-Wildfire-prevention-paper.pdf

[26]https://www.europarl.europa.eu/news/en/agenda/briefing/2024-12-16/8/eu-deforestation-law-parliament-set-to-adopt-one-year-delay & https://www.endseurope.com/article/1917264/parliament-agrees-wolf-no-longer-strictly-protected-europe.

[27] https://www.endseurope.com/article/1908571/exclusive-epp-far-right-move-scrap-forest-monitoring-law

[28]https://www.politico.eu/why-go-pro/?client_id=znQGlYseabkN6WX9uDEbFfROVnDhBF1a3SRoQjC0&redirect_uri=https%3A%2F%2Fapi.politico.eu%2Foauth%2Fcallback&response_type=code&pathname=%2Fnews%2F204463&redirect_url=https%3A%2F%2Fpro.politico.eu%2F&timestamp=1757590665080964

[29]https://www.di.se/debatt/en-vinst-for-skogsforetag-och-skogagare/?fbclid=IwY2xjawMuFFZleHRuA2FlbQIxMAABHtJ9jlmq5kzLCtJ1KsCniF2hz4xnoPG7Ptp...

[30] See the Annex to the Draft Report

[31] Without a robust FML, even this basic statistic is difficult to ascertain. According to Forest Europe, in 2020, 84.9% of the EU 28's forest was FAWS (forest available for wood supply). However, many protected areas are also used for logging, and Sotirov (2005) concludes that only 4% of EU forests are strictly protected – making the total used for logging potentially as high as 96%.

[32] See Roberntz & Suominen (2025). *Primary and old-growth forests at risk in Finland and Sweden: What will the EU's impact be on protecting them?* https://www.wwf.eu/?16616441/WWF-sounds-alarm-on-Finland-and-Swedens-failure-to-protect-Europes-last-old-growth-forests

[33] Scherpenhuijzen *et al.* (2025) Mapping forest management regimes in Europe. *Forest Ecology and Management* **594,** https://www.sciencedirect.com/science/article/pii/S0378112725004487

[34] "AGRI-FISH" is the Agriculture and Fisheries Council configuration. The European Council has 10 such configurations.

[35] https://www.consilium.europa.eu/en/council-eu/preparatory-bodies/ad-hoc-working-party-on-forest-monitoring/

[36] We have been told, six or seven, and to a limited extent. It might be relevant that Council ad-hoc working party sessions on the FML clashed with Environment Working Party dates in 6 out of the 9 dates chosen by the Belgian Presidency in the first semester 2024 (5/2, 23/2, 11/3, 22/4 and 21-22/5), and in 2 of the 6 dates under the Hungarian presidency (2nd semester 2024, 22/10 and 11/11) and in 2 of the 5 meetings under Polish presidency in 2025 (5/3 & 4/6). (Personal communications from participants)

[37] https://valtioneuvosto.fi/en/-/1410837/ministers-of-forest-rich-eu-member-states-gather-for-for-forest-group-meeting-in-finland

[38] For Forests Group (2024). *Way Forward in Forest Monitoring Setting the scene: AOB in the Agriculture and Fisheries Council 23 September*. https://mmm.fi/documents/1410837/0/Forest_monitoring_AOB_September+(1).pdf/a8a69154-7c45-694d-7c3b-487e203aea5f/Forest_monitoring_AOB_September+(1).pdf?t=1727085785467

[39] E.g. as set out in: CEPF, Copa-Cogeca, European Landowners' Organization & EUSTAFOR's Joint Statement "*European primary producers are asking for practical solutions and postponement of the EUDR."* We cannot find a current url.

[40] General Secretariat of the Council. *Joint statement by Austria, Finland, Latvia, Sweden and Slovenia*. (2025). https://data.consilium.europa.eu/doc/document/ST-10020-2025-ADD-1/en/pdf.

[41] General Secretariat of the Council (2020). *Conclusions on Biodiversity - the need for urgent action - Approval*. https://data.consilium.europa.eu/doc/document/ST-11829-2020-INIT/en/pdf For more on Sweden & Finland's failures to implement this process, including examples of how overly stringent definitions of primary and old-

growth forests can be used to minimise the area in need of protection (in Sweden and Finland), see Roberntz & Suominen (2025).

[42] https://data.consilium.europa.eu/doc/document/ST-10020-2025-ADD-2/en/pdf

[43] Turubanova, S. *et al* (2023). Tree canopy extent and height change in Europe, 2001–2021, quantified using Landsat data archive. *Remote Sensing of Environment* 298, https://doi.org/10.1016/j.rse.2023.113797; Scherpenhuijzen, N. *et al* (2025). Mapping forest management regimes in Europe. *Forest Ecology and Management* 594, https://www.sciencedirect.com/science/article/pii/S0378112725004487;

[44] Barredo, J. I., Marí Rivero, I. & Janoušková, K. (2024): Assessing disturbances in surviving primary forests of Europe. *Conservation Biology* (2024) doi:10.1111/cobi.14404; Also, https://www.wwf.eu/?16616441/WWF-sounds-alarm-on-Finland-and-Swedens-failure-to-protect-Europes-last-old-growth-forests

[45] https://onlinelibrary.wiley.com/doi/10.1111/gcbb.70035

[46] EEA 2020

[47] Grantham, H. S. *et al.* (2020). Anthropogenic modification of forests means only 40% of remaining forests have high ecosystem integrity. *Nature Communications* **11**, 5978, https://www.nature.com/articles/s41467-020-19493-3

[48] E.g. satellite monitoring can now penetrate the canopy and deliver precise data on sub-canopy carbon storage. https://www.esa.int/Applications/Observing_the_Earth/FutureEO/Biomass/Biomass_satellite_returns_striking_first_images_of_forests_and_more

[49] NGO paper (2024)*: Benefits of a Forest Monitoring Law*. https://eeb.org/library/benefits-of-a-forest-monitoring-law/

[50] Enshrined in the EU directive on public access to environmental information (Dir 2003/4/EC).

[51] Camargo, J. & Pimenta de Castro, P. *Portugal em Chamas*. (Bertrand Editora, 2018). Ch.5

[52] Wohlleben, P. *The power of trees: how ancient forests can save us if we let them*. (Greystone Books, 2023). See ch. 20, “More money, less forest”.

[53] https://www.regeringen.se/pressmeddelanden/2025/01/nytt-rad-for-skogsindustrins-vardekedja/Visited 21/6/2025

[54] https://www.skogsstyrelsen.se/en/about-us/national-forest-program/

[55]Sotirov (2025). *Funding resilient forests: rethinking EU and state subsidies*. *Pp.77-78,* https://www.fern.org/fileadmin/uploads/fern/Documents/2025/Funding_Resilient_Forests_July_2025.pdf

Contact:
Thomas Chambers
Partnership for Policy Integrity
tchambers@pfpi.net