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**NOTE**

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| From:    | General Secretariat of the Council  |
| To:      | Council   |
| Subject: | Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on a monitoring framework for resilient European forests<br>- <i>General approach</i><br>= <i>Statement</i> |

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**Joint statement by Austria, Finland, Latvia, Sweden and Slovenia**

Austria, Finland, Latvia, Sweden and Slovenia agree that it is important providing comparable and consistent information on the state and use of forests in the EU in order to contribute to the bio-economy, fighting against climate change, protecting biodiversity and thus strengthening the overall resilience of forests. From the very beginning of the negotiations, Austria, Finland, Latvia, Sweden and Slovenia made clear that the objectives and benefits of a binding legal act must aim at an actual added value at EU level, avoiding additional costs and disproportionate requirements while at the same time taking national circumstances and established national forest monitoring systems fully into account, as part of a bottom up approach. Moreover, the quality and security of forest data must be preserved, especially with regard to sensitive operational data and the necessary protection of the location of the sampling plots of national forest inventories.

Austria, Finland, Latvia, Sweden and Slovenia have established a functioning system of forest monitoring for decades based on a comprehensive forest inventory and interpretation of measurements into information by competent national experts. The successful cooperation between the national forest inventories includes, above all, the harmonization of forest data. EU Member States are equally embedded in the international system of reporting with periodic presentation of the state of forests (namely Forest Resources Assessment and State of Europe's Forests under the Forest Europe process).

Hard work of this and previous Presidencies resulted in the compromise text, representing a significant improvement compared to the initial proposal and is considered as a step in the right direction. This applies in particular to the bottom-up approach based on national forest data, the deletion of geographically explicit maps, forest units, certain indicators and the omission of provisions relating to forest management plans.

However, there are still several key elements that, from our standpoint, would benefit from additional clarification. This essentially concerns the necessity of a legal act in terms of safeguarding the subsidiarity and proportionality principle, the definition of forests, the need to delete individual indicators such as primary and old-growth forests, as well as the number and scope of delegated acts. The latter is of particular concern, as extensive use of delegated acts could undermine the principle of subsidiarity and shift decisions in competence of Member States away from them. In this context, it should be noted that including delegated acts will not only raise legal concerns, but are also very likely to lead to significant increase of the implementation costs for Member States.

Austria, Finland, Latvia, Sweden and Slovenia assume that the aforementioned issues will be further discussed in the negotiation process ahead and that those key concerns along with additional simplification will be adequately addressed.