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NOTE

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 - <i>General approach</i> = <i>Statement</i>

Statement by the Commission

The Commission thanks the Presidency for the efforts made towards agreeing on a General Approach of the Council, acknowledges the progress made by the co-legislators, and reiterates its openness to work on the proposal including on simplification.

However, the Commission expresses concerns in relation to a General Approach based on a significant number of amendments that taken together alter the core elements of the proposal and prevent the achievement of its objectives, therefore depriving it of its *raison d'être*. Indeed, if adopted, these amendments would result in an EU forest monitoring framework that is not fit-for-purpose and would not ensure an adequate level of flexibility to account for future technological progress neither the necessary resilience-building against climate-induced disasters. At the same time, it would lead to greater costs and administrative burden at EU and national level and would not contribute to the objective of making high quality standardised data available across the EU.

First, while the Commission would be open to work with the co-legislators on improving the proposal in relation to indicators, the full deletion of all indicators to be monitored by the Commission through Earth Observation and the deletion of the provision on sharing of raw ground data would **impede the combination of Earth Observation and ground data, affect the quality and accuracy of data**, while the suggested shift of the responsibility for some data collection to the Member States would introduce **unnecessary burden** on them.

Second, the proposed changes would **prevent a mapping** of EU-wide forest data, limiting the added value of the Regulation compared to existing international reporting frameworks, diminishing the simplification potential of map use by forest actors and stakeholders envisioned by the proposal.

Third, the structural deletion of the minimum frequency of data collection, of accuracy standards and of a data quality assessment process would **undermine the objective of providing timely and reliable forest data** in the EU.

Finally, by fully deleting all resilience-related indicators, the proposal would fail to advance real-time monitoring of **climate impacts on EU forests and improve the understanding on the interplay between management, diversity and resilience**.

The Commission hopes that its main concerns can be addressed in the course of the legislative procedure. If the current draft Council position were to be confirmed by the co-legislators, the Commission might consider withdrawing the proposal.
