NGO assessment of FML last-minute amendments

19th September 2025

The NGO Sept. 16th briefing "Hatchet Job on the Forest Monitoring Law: What next?"[1] explains how Parliament and the Council weakened the EC's proposal for a Forest Monitoring Law (FML), stripping out requirements for modern satellite-based monitoring and tracking of forest resilience. It urged MEPs and the co-rapporteurs to restore key elements of the EC's proposal. Apparently, we were not the only ones with serious concerns. That same day, we heard that MEPs had submitted last-minute amendments to the FML that were accepted by the co-rapporteurs.

Analysis: Do the last-minute amendments rescue the FML?

The amendments would re-establish satellite monitoring of three important indicators – *Forest area*, density of *Tree crown cover,* and extent of *Defoliation*. They also re-establish a degree of accurate mapping, albeit for only a few indicators. These amendments mean the Parliament's proposal now includes enough satellite monitoring elements to be reasonable.

[1] https://forestdefenders.org/after-policymakers-hatchet-job-on-the-forest-monitoring-law-whats-next/

⇒ *The last-minute amendments should be enough to persuade MEPs to approve the Parliament's position*, but trilogue negotiations with the Commission and Council must not result in any backward steps (in which case, the Commission could still withdraw the proposal).

NGOs consider the Parliament's updated position to be improved, but still a bare-minimum. Should these amendments be adopted, we urge the rapporteurs to make them conditional in trilogue negotiations with the Council. The bare-bones amendments do not improve monitoring of biodiversity & ecosystem services. These gaps will need to be addressed in the future.

Our earlier briefing set out four tests for a fit-for-purpose FML. Do the proposed amendments deliver?

1. Inclusion of satellite monitoring

Parliament's last iteration had removed the EC's role as provider of Copernicus satellite data on key indicators such *as Forest area, Tree cover density, Forest connectivity* and *Defoliation*. The only functionality Parliament retained was monitoring related to forest fires.

The new amendments re-establish EC collection of satellite-monitored data on ***Forest area*** and ***Tree crown cover*** (renamed from *Tree cover density*) and ***Defoliation***. They also require Member States to provide ground data to ensure the calibration of satellite data. These changes mean that most of the EC's satellite indicators are now intact in the proposal. *Forest type* and *Forest connectivity* have not been reinstated as EC-collected satellite indicators – both remain inadequate methodologies, with data to be collected by Member States.

Verdict: These changes are significant. Whereas Parliament's earlier proposal did not include mapping of satellite data to enable monitoring of forest cover and density but instead relied on Member State summary statistics (only every half-decade and aggregated to regional scale), the new amendments restore real-time mapping of EU forests. Unfortunately, however, the new amendments still inexplicably exclude a requirement for mapping of *Primary and old-growth forests* and of *Protected areas*, and they delay consideration of how to address *Location of forest habitats outside Natura 2000 sites*.

2. Mapping of forests and forest data across the EU

Parliament's earlier proposal endorsed collection and publication of highly aggregated data, essentially avoiding all mapping (and therefore traceability). A few statistics were going to be aggregated to regional level (NUTS 2 or 3), such as *Forest area* and *Tree crown cover*, with others only given as national summary statistics, e.g. on *Area of primary & old-growth forest, Deadwood*, and *Tree species diversity*. The amendments reinstate high resolution satellite mapping of fundamental indicators, *Forest area* and *Tree crown cover* and *Defoliation*.

This is the bare minimum, as the new amendments still do not require mapping of important indicators such as *Primary and old-growth forests*, *Deadwood, Tree species diversity* and *Invasive species*. However, mapping of *Forest area, Tree crown cover* and *Defoliation* will provide fundamental data of relevance to resilience (see below). Parliament also proposes to clarify, through a stepwise approach, methodologies on indicators such as *Location of forest*

habitats outside Natura 2000 sites, Forest structure, Diversity of non-tree species, Threatened species and *Forest naturalness classes*.

Verdict: The amendments are worth supporting as they resuscitate some fundamental aspects of mapping, with the potential for "stepwise" indicators to come later.

3. High resolution and high frequency of data collection

Parliament's early proposal would limit data collection and reporting to methods with poor spatial resolution low frequency. This remains the case for some important indicators, e.g. *Primary and old-growth forests*, that are collected and published only at the national level and only every five years. For other indicators, the methods are yet to be determined (but will be via a "stepwise approach"). **What's new** is reintroducing the real-time satellite data, accurate to 10 meters, on *Forest area, Tree crown cover* and *Defoliation*.

Verdict: It is regrettable that MEPs have not defended robust data collection on *Primary and old-growth forests* and *Deadwood*. However, the proposal now includes high resolution use of satellites for a few fundamental indicators, which is a step forward. Such information gaps may need to be plugged outside of the FML (e.g. through upgrades to the Forest Information System for Europe, or by drawing together independent initiatives that already research such topics).

4. Inclusion of resilience, biodiversity & ecosystem services indicators

Until the last-minute amendments, the Parliament's proposals had the following effects on data collection and monitoring of indicators, deleting, weakening or delaying *all* the indicators on biodiversity and resilience:

Deleted: *EU forest type, Location of forest habitats in Natura 2000*

Weakened: *Defoliation, Deadwood, Primary & old-growth forests, Protected forest areas, Tree cover disturbances, Forest disturbances other than fires, Tree species diversity, Presence of invasive species*

Delayed: *Forest structure, Location of forest habitats outside Natura 2000 sites, Forest naturalness classes, Diversity of non-tree vegetation, Threatened species, Common forest bird index*.

"Forest disturbances caused by factors other than fire" was assigned to the Commission for satellite monitoring. However, there is still no mandate for data collection on forest disturbance by logging (which represents 82% of EU forest disturbance[2]).

What's new is ensuring that *Tree crown cover* and *Defoliation* are reinstated as accurate satellite indicators. This will help track forest health, but will not be enough to track *why* certain forests are dying back, while others remain resilient.

Verdict: The deletion, weakening and delaying of so many important biodiversity/resilience indicators is still a huge loss for a science-based FML. However, the new amendments do introduce satellite monitoring with some functionality on resilience.

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[2] 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