2. Norwegian Forest Industry and Traceability in an EUDR Context

Purpose

This document provides an overview of the Norwegian forest sector, its regulatory framework, certification systems, and traceability infrastructure. The purpose is to support EU customers in conducting due diligence under the EU Deforestation Regulation (EUDR) by providing relevant background information on the sourcing of wood and wood-based products from Norway. [green-foru….europa.eu], [green-foru….europa.eu], [eur-lex.europa.eu]

Executive Summary

Norway has a well-established and highly regulated forestry sector that provides a strong foundation for compliance with the EU Deforestation Regulation (EUDR). Forestry is predominantly based on private ownership, with more than 95% of forest properties owned by individuals and approximately 85% of timber harvesting taking place on privately owned forest land. Forest management is governed by the Forestry Act (Skogbruksloven) and supported by a comprehensive legal framework covering environmental protection, biodiversity, labour rights, and property ownership. [skogbruk.nibio.no], [skogbruk.nibio.no], [lovdata.no]

Virtually all commercial forestry operations in Norway are conducted within PEFC-certified systems, often supplemented by FSC certification. These certification schemes provide independent auditing, documented management practices, and supply chain controls that support sustainable forest management and traceability. However, certification serves as supporting evidence and does not replace the due diligence obligations established by the EUDR. [pefc.no], [pefc.no], [eur-lex.europa.eu], [legalityna…or.efi.int]

The Norwegian forest value chain is highly digitalized. Harvest areas are geographically defined and registered before logging operations commence. Timber sales, harvesting activities, transport records, and timber measurement data are recorded through shared industry systems, at Skogdata creating traceability from the harvest area to the receiving industrial facility [skogdata.no] . Independent timber measurement performed by Norsk Virkesmåling provides an additional layer of transparency and verification. [m3n.no], [lovdata.no]

Norway is classified as a **low-risk country** under the EUDR country benchmarking system. Combined with strong governance, clearly established property rights, mandatory compliance with environmental legislation, widespread certification, and comprehensive digital

documentation, this provides favourable conditions for collecting the geolocation, legality, and traceability information required under the EUDR. [green-foru….europa.eu], [eur-lex.europa.eu], [green-foru….europa.eu]

While responsibility for EUDR compliance ultimately remains with the operator placing products on the EU market, the Norwegian forestry sector provides robust systems and documentation that support efficient due diligence and a high degree of supply chain transparency. [green-foru….europa.eu], [eur-lex.europa.eu]

1. Overview of Norwegian Forestry

Norwegian forestry is characterized by a highly decentralized ownership structure. In 2023, Norway had 125,450 forest properties with at least 25 decares (2.5 hectares) of productive forest land. Approximately 118,600 of these properties were owned by private individuals. Private forest owners account for more than 95% of all forest properties and manage approximately 77% of the productive forest area. In the same year, 84.5% of all timber harvesting was carried out on privately owned forest properties. [skogbruk.nibio.no], [skogbruk.nibio.no]

As a result, Norwegian forestry consists of a large number of independent forest owners operating within a common legal, environmental, and certification framework. [skogbruk.nibio.no], [lovdata.no]

2. Legal Framework

Forest management in Norway is governed primarily by the Forestry Act (Skogbruksloven), which applies to all forest land regardless of ownership. The purpose of the Act is to promote sustainable management of forest resources while safeguarding biodiversity, landscape values, outdoor recreation, and cultural heritage. Forest owners are legally responsible for ensuring that forestry operations comply with applicable legislation. [lovdata.no], [lovdata.no]

In addition to the Forestry Act, forest management is subject to other relevant legislation, including:

- Nature Diversity Act (Naturmangfoldloven)
- Working Environment Act (Arbeidsmiljøloven)
- Transparency Act (Åpenhetsloven)
- Property and land registration legislation governing ownership rights and land use

Together, these laws establish a comprehensive framework covering environmental protection, labour rights, land tenure, and sustainable forest management.

3. Forest Management Planning

Norwegian forest owners typically manage their forests through property-specific forest management plans ("Skogbruksplaner"). These plans contain information on forest resources, environmental values, harvesting opportunities, and long-term management objectives.

Forest owner cooperatives, timber buyers, logging contractors, and other forestry stakeholders operate within this planning framework and in accordance with applicable legislation and certification requirements.

4. Certification Systems

Virtually all commercial forestry operations in Norway participate in the PEFC certification system, and many companies also maintain FSC certification. The dominant certification model is group certification, which allows thousands of small forest owners to participate in independently audited sustainable forest management systems. [pefc.no], [pefc.no], [Hvordan bl…PEFC Norge]

The Norwegian PEFC Forest Standard establishes requirements relating to:

- Sustainable forest management
- Biodiversity protection
- Environmental considerations
- Harvest planning
- Documentation and record keeping
- Internal and external auditing

PEFC and FSC certification schemes provide valuable support for EUDR due diligence through documented procedures, third-party audits, and traceability systems. However, certification does not replace EUDR obligations and should be considered supporting evidence within a broader due diligence process. [eur-lex.europa.eu], [legalityna…or.efi.int], [eur-lex.europa.eu]

5. Timber Sales and Harvest Registration

When timber is sold, the forest owner normally enters into an agreement with a timber purchaser, either through a forest owner cooperative or a private company.

Harvesting operations are digitally registered through the Norwegian forestry sector's common timber trading systems. Information recorded typically includes:

- Forest property identification
- Forest owner information
- Timber purchaser information
- Geographical harvest area
- Operational boundaries
- Contract information

These digital records form the basis for harvest planning and establish traceability to the area of harvest.

6. Harvesting and Supply Chain Traceability

Harvesting is normally conducted by professional logging contractors operating on behalf of the forest owner or timber purchaser.

Before harvesting begins, the harvesting area is geographically identified and documented. Geolocation information can subsequently be linked to timber deliveries through digital forestry systems used throughout the supply chain.

Following harvest, timber is transported to roadside storage areas and subsequently delivered to industrial facilities or terminals by specialized timber transport companies.

Throughout the logistics chain, delivery information, transport records, and commercial transactions are digitally documented, contributing to traceability from harvest area to receiving industry.

7. Independent Timber Measurement

Norway has a statutory timber measurement system that requires timber sold for industrial processing or resale to be measured according to common standards.

The purpose of the system is to ensure:

- Neutral and independent measurement
- Consistent application of quality criteria
- Accurate determination of timber volume
- Transparency between seller and buyer

Measurements are primarily conducted by Norsk Virkesmåling, an independent organization jointly established by representatives of forest owners and the forest industry. Measurement results are documented and made available to both parties. [m3n.no], [lovdata.no]

8. Digital Infrastructure

Much of the Norwegian forestry sector's trade, logistics, timber measurement, and documentation is supported through common digital systems operated by Skog-Data.

These systems facilitate electronic registration of:

- Forest ownership information
- Harvest contracts
- Harvest-area geolocation data
- Transport records
- Timber measurement results
- Commercial transactions

The extensive use of digital infrastructure provides a high degree of transparency and supports traceability throughout the wood supply chain.

9. EUDR-Relevant Considerations

Norway is classified as a **low-risk country** under the EUDR country benchmarking system. Under the EUDR, products originating entirely from low-risk countries may be subject to simplified due diligence requirements. [green-foru….europa.eu], [eur-lex.europa.eu]

The Norwegian forestry sector provides several characteristics that support EUDR compliance:

- Comprehensive forestry legislation
- Clearly established property rights
- Legally required environmental compliance
- Digitally registered harvesting operations
- Availability of harvest-area geolocation information
- Independent timber measurement
- Extensive supply-chain documentation
- Widespread PEFC and FSC certification
- Third-party auditing throughout the value chain

Together, these systems provide a strong foundation for collecting and maintaining information required under the EUDR, including information relating to legality, geolocation, and traceability. [green-foru….europa.eu], [eeas.europa.eu], [m3n.no]

The Norwegian digital infrastructure also provides favourable conditions for maintaining traceability to the harvest area, provided that information is properly recorded and maintained throughout the supply chain.

However, responsibility for EUDR compliance remains with the operator placing products on the EU market. Operators must ensure that appropriate geolocation data and supporting documentation are available and must comply with the due diligence requirements of the Regulation. Certification systems such as PEFC and FSC may support this process but do not replace EUDR obligations. [green-foru….europa.eu], [eur-lex.europa.eu], [legalityna…or.efi.int]

10. Social, Labour and Governance Framework

The Norwegian forestry and forest products sector operates within a governance framework characterized by:

- Strong rule of law
- Transparent land ownership systems
- Enforced labour legislation
- Mandatory occupational health and safety requirements
- Corporate reporting and auditing requirements
- Human rights due diligence requirements under the Transparency Act

Compliance with labour and social requirements is commonly verified through PEFC and FSC audits, supplier evaluations, and contractual requirements throughout the supply chain.

In addition, annual third-party financial audits are standard practice for Norwegian companies, providing an additional governance and compliance mechanism.

Conclusion

The combination of robust forestry legislation, clearly established property rights, widespread certification, mandatory timber measurement, and highly digitalized supply-chain systems provides a strong foundation for EUDR-related due diligence in Norway. The availability of harvest-area information, geolocation data, transaction records, and third-party verification mechanisms supports transparency and traceability throughout the forest value chain and facilitates the collection of information required under the EU Deforestation Regulation (EUDR). [lovdata.no], [m3n.no], [green-foru….europa.eu], [eur-lex.europa.eu]

References

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