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## JOINT STATEMENT

### EUDR: Urgent Action Needed to Preserve EU Competitiveness and Supply Chains

European value chains across agriculture, forestry, feed, and processing sectors support the objective of tackling global deforestation. Many of the concerns we have consistently raised over the past three years remain unresolved, including the regulation's practical feasibility, the significant administrative burden it places on our members, as well as the legal uncertainties and potential diversion of commodity flows it may cause. The current design and implementation of the EU Deforestation Regulation (EUDR) risk producing unintended consequences that could undermine EU competitiveness, disrupt supply chains, and weaken strategic autonomy.

Despite extensive guidance and preparatory efforts, the Regulation remains **impractical and disproportionate to implement at scale**. Fundamental issues, such as unclear definitions, inconsistent requirements, and disproportionate administrative burdens, persist and cannot be resolved through non-binding measures alone. Operators continue to face significant legal uncertainty. The non-binding nature of the Commission's Guidance and FAQs leaves operators dependent on how individual Competent Authorities choose to interpret and enforce the Regulation. This creates a serious risk of divergent implementation across Member States, undermining legal certainty, distorting competition, and fragmenting the EU internal market which is contrary to its fundamental principles.

We highlight the following key concerns affecting our sectors:

- **Unworkable compliance framework:** Requirements to verify compliance with all relevant national legislation in producing countries remain vague, with no harmonised or authoritative reference framework. The Commission indicated the plan to publish a repository of relevant legislation to assist Operators in meeting the information and due diligence requirements, but only by December 2026. This is too late for operators' due diligence and exposes companies to legal and operational risks.

- **Disproportionate administrative burden:** Complex due diligence obligations, combined with data submission challenges and unresolved IT system issues, create excessive costs without clear added value for deforestation prevention.
- **Supply chain disruption risks:** The Regulation, in its current form, risks triggering shortages of key commodities, higher input costs, and reduced availability of products in the EU market, affecting food security, price stability, and downstream industries.
- **Legal and liability uncertainty:** Gaps in clarity on responsibilities across the supply chain, coupled with overlaps with other EU legislation, expose operators to heightened legal risks, potentially including criminal liability.
- **Global inconsistency challenges:** Requirements such as geolocation data sharing conflict with laws in producing countries, while credible national systems and third-party certification systems are not adequately recognised. Existing, robust sustainability certification schemes should be formally recognised as corroborating evidence within operators' risk assessment and risk mitigation. Such schemes rely on independent third-party audits, established governance structures and field-level verification mechanisms, while supporting the inclusion of smallholders. Their greater recognition would strengthen due diligence processes, avoid unnecessary duplication of audits and administrative requirements, and facilitate a pragmatic transition towards deforestation-free supply chains.
- **Need for harmonisation:** In engagement with Competent Authorities across Member States, companies experience different levels of preparedness and a lack of harmonisation due to varying requirements by Competent Authorities, where they are operational. As the commodities covered by the regulation circulate across multiple EU Member States, non-harmonised implementation by competent authorities risks undermining both EU companies' ability to trade and the integrity of the EU Single Market.
- **Ensure proportionality and real simplification for micro and small operators.** There is currently a lack of confidence that the promised proportionality and simplification measures will be effectively implemented. There is also uncertainty about whether the databases developed at EU or Member State level will be accessible and properly integrated into the EUDR IT system.

The simplification package of early May provided limited solution to address deeply rooted issues. Without targeted legislative amendments, many operators will simply be unable to comply, leading to market disruption and reduced effectiveness of the Regulation.

At a time of geopolitical instability, supply volatility, and high inflation, it is critical that EU policy balances environmental ambition with economic and operational realities.

A workable EUDR could contribute to both **protecting forests on a global scale and preserving the viability of European sectors**. Achieving this requires pragmatic adjustments that make the Regulation enforceable, proportionate, and effective in practice. As such, **urgent, targeted action is needed now to ensure the EUDR delivers on its environmental goals—without compromising Europe’s competitiveness, raw material supply, food and feed security, and strategic autonomy.**

#### *Signatories*

BIOENERGY EUROPE – *The voice of European bioenergy*

CEPF – *Confederation of European Forest Owners*

COPA-COGECA – *European Farmers and European Agri-Cooperatives*

COCERAL – *European Association of Trade in Cereals, Oilseeds, Rice, Pulses, Olive Oil, Oils and Fats, Animal Feed and Agrosupply*

ELO – *European Landowners’ Organisation*

EOS – *European Organisation of the Sawmill Industry*

ETTF – *European Timber Trade Federation*

FEDIOL – *European Association for Vegetable oil and Protein Meal industry*

FEFAC – *European Feed Manufacturers' Federation*

FEFPEB – *European representative organisation of national timber packaging associations*

UECBV – *The European Livestock and Meat Trades Union*