

JOINT STATEMENT

URGENT NEED TO INCLUDE EUDR IN THE COMMISSION SIMPLIFICATION PROPOSALS

Copa Cogeca, CEPF and ELO welcomed the decision of the European Commission in December 2024 to extend the start of the entry of the application of the EU Deforestation Regulation (EUDR) by an additional 12 months and have asked that the focus must shift towards simplification. This call, that we have repeated over the last almost two years, it is linked to our concerns about the regulation's practical applicability, the substantial administrative burden it imposes on our members and the possible legal uncertainties and diversion of commodity flows that this will create.

We acknowledge that the Commission is trying to achieve simplifications for EUDR implementation by updating the FAQs and Guidance that were published on 15 April 2025. However, there are no actual improvements introduced for EU farmers and forest owners, which have been frequently and intensively put forward by agricultural and forest stakeholders. Subsequent demands are still valid and urgently need to be implemented if the EUDR is really to enter into application at the end of the year.

The Commission's commitments for simplification highlighted in the Commission Work Programme for 2025, and specifically the Omnibus packages offer a great opportunity to respond to these concerns and adequately facilitate the EUDR's implementation.

In light of these concerns on the EUDR's proportionality, we are suggesting two possible options intended to facilitate a more targeted, risk-based, and practicable implementation of the EUDR.

1. A proposal to introduce a fourth benchmarking category "negligible/insignificant risk", allowing for a proportionate regulatory approach in countries with robust forest governance and where deforestation is not posing any challenges. This would enable actual simplification for operators sourcing from such countries and help align EUDR implementation with existing sustainability commitments and international frameworks.

2. A proposal to make the compliance requirements more adapted to the risk categories by reducing the regulatory burden for SMEs and introducing more flexible compliance mechanisms. We propose the introduction of the "sourcing area" concept and the possibility for public authorities to issue due diligence statements for broader areas than individual plots of land and the replacement of reporting through documentation requirements

We believe these amendments are fully in line with the spirit of the EUDR that we fully support, and that they will help preserve its integrity while making its enforcement more efficient and legally robust. The proposed changes will strengthen the implementation of Regulation's by making it more practical, proportionate, and enforceable.

We respectfully call to urgently consider these proposals in the context of the upcoming simplification proposals, and we remain available for any further dialogue. We stand ready to support a constructive process that ensures the EUDR delivers its goals without undermining the viability of responsible operators across Europe.