



ELO

European
Landowners'
Organization

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EUDR simplification package fails to deliver – ELO considers the current framework unfit for purpose and calls for a full redesign

Brussels, 5th May 2026 – The European Landowners' Organization (ELO) expresses grave reservations about the European Commission's latest "simplification package" for the EU Deforestation Regulation (EUDR), concluding that the regulation in its current form is not fit for purpose.

Following the publication of the April package, including the report, updated FAQs, guidance document, refinements to product scope, updates to the Information System, and the creation of repositories on producing countries' legislation, **ELO finds that core structural problems remain unresolved, particularly for European micro and small primary producers such as farmers and forest owners.**

Despite the European Commission's claim that the simplification will reduce compliance costs by 75%, **ELO warns that administrative complexity remains high, legal uncertainty persists, and the burden on forest owners and Member States is still disproportionate.**

Although MSPOs benefit from a simplified regime, notably a one-time simplified declaration and exemptions from full due diligence, they remain subject to core due diligence obligations. In particular, traceability requirements remain unchanged in substance. Operators must still provide precise information linking products to specific plots of land.

While postal addresses may replace geolocation in limited cases, this is only possible where the address clearly corresponds to the exact plot, a condition rarely met in reality. Likewise, forest owners are particularly affected by legal uncertainty about who qualifies as an operator, as this depends on contractual arrangements and national law rather than on clear, uniform criteria.



The European Commission highlights cooperation with international partners, including through trade agreements and the World Trade Organization. However, **it remains unclear to what extent the EU can rely on third countries to ensure equivalent standards and enforcement**, especially since the Regulation does not place any obligation on third countries to share relevant data with the EU. Further concerns pertain to the effectiveness of enforcement. Member States' competent authorities are responsible for verifying compliance and may carry out checks in third countries, but only with the agreement of those countries.

The package also fails to adequately address the role of forest owner associations. While cooperatives and associations may submit declarations either in their own name or on behalf of their members, this possibility remains limited. They can only act in their own name if they qualify as operators themselves, which depends on ownership and production criteria, and otherwise may only act as authorised representatives, requiring formal mandates. In many common marketing scenarios where forest owners sell timber directly or via intermediaries, reporting obligations remain with each individual owner. As a result, collective reporting is not effectively enabled, administrative burdens are not reduced, and the role of forest owner organisations remains insufficiently recognised.

ELO stresses that the Commission has missed a critical opportunity to deliver meaningful simplification. Land identification requirements remain effectively unchanged, individual reporting obligations persist in key scenarios, and no structural relief has been achieved for European farmers and forest owners. At a time when Europe needs resilient, climate-adapted forests and active forest management for a strong EU Bioeconomy, the current approach risks discouraging sustainable forest operations rather than supporting them.

ELO therefore calls on EU institutions to launch a new evidence-based legislative process and to develop a system that is workable, proportionate and adapted to the realities of small-scale producers and forest owners.

About the European Landowners' Organization

ELO is a leading voice representing the interests of landowners, rural entrepreneurs, and rural land managers in Europe. We promote sustainable land management practices, fosters innovation, and advocates for the recognition of landowners' crucial role in shaping Europe's landscapes and rural areas.

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