

Mrs Ursula von der Leyen
President of the European Commission

Mrs Jessika Roswall
Commissioner for Environment, Water Resilience and a Competitive Circular Economy

Brussels, 14.5.2025

Dear Madam President,
Dear Madam Commissioner,

We would like to draw your attention to serious concerns regarding the implementation of the Regulation (EU) 2023/1115 (EUDR), which aims to prevent deforestation and forest degradation.

While the environmental objectives of the EUDR are broadly supported, its current formulation and implementation risk placing disproportionate burdens on small and medium-sized enterprises, without delivering the intended results. The regulation introduces extensive administrative requirements and imposes technically unrealistic demands for tracing and verifying the origin of commodities—expectations that are especially difficult to fulfill in the context of global supply chains.

Stakeholders across Member States would be facing several serious challenges. The regulation calls for verification methods—precise geolocation and full traceability of commodities like cattle or composite wood products—that often exceed technical capabilities, particularly in third countries. SMEs would be disproportionately affected, lacking both the human and financial resources to comply with such complex obligations, often having to rely on costly consultants and IT systems.

Furthermore, without a definitive list of low-risk countries and with diverging interpretations across the Union, legal certainty is lacking, leaving operators exposed to varying standards. At the same time, there are real fears surrounding the handling of commercially sensitive data, which, under current rules, could be exposed and potentially misused, thereby distorting market dynamics.

In many cases, the regulation also requires information that is already collected through existing EU or national regulatory systems, leading to redundant reporting obligations that add no value while significantly increasing the administrative burden.

We fully support the aim of combating deforestation, but we believe that a framework with such systemic shortcomings may ultimately fail to identify actual illegal activity. At the same time, it could hinder legitimate EU-based producers and compromise the competitiveness of our agri-food and forestry sectors.

Given these concerns, we respectfully urge the Commission to delay full implementation of the EUDR until the most pressing technical and legal issues are resolved. We call for the

introduction of simplified compliance options or exemptions for SMEs and operators from low- or negligible-risk regions. In addition, we encourage the Commission to establish a category of “zero-risk countries,” which was voted for by parliament on 14th November 2024, where the regulation would not apply, to ensure proportionality and reflect differences in risk levels. Existing certification schemes and national-level systems should be integrated to minimize duplication, while harmonisation across the Union—including a public, transparent risk assessment methodology—is essential. Finally, the feasibility of demanding traceability across complex supply chains or relying on real-time satellite monitoring must be realistically re-evaluated.

We acknowledge that the Commission has published draft guidelines intended to facilitate the interpretation and application of the EUDR. However, while this initiative is appreciated, we consider that the guidelines in their current form are not sufficient to provide businesses with the necessary legal certainty, practical tools, and clarity required for effective and timely compliance. Many technical and operational challenges remain unresolved, and therefore a delay in full implementation is essential to ensure that companies, particularly SMEs, can adequately prepare.

In its current form, the EUDR may undermine the Union’s economic foundations while offering only limited practical impact on forest protection. We urge the Commission to take these realities into account and work toward a more balanced and effective regulatory framework.

We remain ready to cooperate on the development of solutions that are both environmentally responsible and economically sustainable.

We trust that the Commission will give this matter the attention it deserves and look forward to your response.

Yours sincerely,

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