

Brussels, 10 October 2025

To the attention of

Ms. Jessika Roswall
Commissioner for Environment, Water Resilience and a Competitive Circular Economy
Rue de la Loi / Wetstraat 200
1049 Brussels
Belgium

Ensuring Simplification and Legal Certainty in the Implementation of the EU Deforestation Regulation (EUDR)

Dear Commissioner Roswall,

The undersigned organisations welcome the European Commission's announcement to postpone the application of Regulation (EU) 2023/1115 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation ("EUDR"). This decision rightly recognises that significant implementation challenges still persist; **consequently, we call for the prompt adoption of a legislative act ensuring that the postponement is legally formalised and enforceable.**

However, the postponement alone will not suffice to resolve the challenges and avoid negative implication arising from the current text. **There is an urgent need for simplification to provide concrete solutions to persisting proportionality and feasibility issues and to restore legal certainty for economic operators.** To date, such legal certainty, a general principle of EU law enshrined in Article 2 TEU and consistently upheld by the Court of Justice of the European Union (CJEU) **and proportionality**, another general principle of EU law outlined in Article 5 (4) TEU, is manifestly lacking

The European Commission has issued several non-binding documents, including Guidelines and "Frequently Asked Questions (FAQs)", intended to clarify certain obligations under the EUDR. While these instruments may have practical relevance, they **do not constitute legally binding acts** within the meaning of Article 288 TFEU, nor can they be regarded as providing an authentic interpretation of Union law. Consequently, they **do not create legitimate expectations** upon which operators may rely before national courts or EU jurisdictions.

In addition, there are no improvements to respond to the key concerns which have been frequently and intensively put forward by our organisations. Subsequent demands are still valid and urgently need to be addressed. **If we want an EUDR that is implementable, we need to have targeted simplification in the Regulation.**

Whilst we understand the political message sent by the MEPs requesting that the implementation the Regulation remains on track, its current provisions risk having an adverse effect on deforestation and jeopardise the regular supply required products at affordable prices on the EU market. We therefore **urge the European Commission, to take immediate and concrete steps to make the EUDR workable in practice, address the structural challenges identified, simplify the requirements, and provide legal certainty for economic operators.** In particular, we call on the Institutions to identify and pursue the most appropriate legal

instrument to introduce the necessary adjustments to the text of the EUDR, so as to ensure its simplification, legal certainty, and uniform application across Member States.

The undersigned stand ready to engage constructively with the European institutions to ensure that the implementation of the EUDR fully complies with EU law, takes into account the simplification calls of the impacted sectors, and enables European economic operators to contribute to the global fight against deforestation. **We therefore formally request a meeting to discuss about our concerns and to find together implementable and legal solutions.**

Yours sincerely,

The signatories:

Bioenergy Europe - Transparency Register number: 97810874431-67

CEI-Bois – European Confederation of Woodworking Industries - Transparency Register number: 470333818389-37 (with the exception of Metsäteollisuus ry and Puutuoteteollisuus ry, which will not co-sign this request)

CEPF – Confederation of European Forest Owners - Transparency Register number: 3647455667-08

COCERAL - European association of trade in cereals, oilseeds, rice, pulses, olive oil, oils and fats, animal feed and agro-supply - Transparency Register number: 2050009628-31

Copa-Cogeca – European Farmers and Agri-Cooperatives - Transparency Register number: Copa 44856881231-49 | Cogeca 09586631237-74

COTANCE- Confederation of National Associations of Tanners and Dressers of the European Community - Transparency Register number: 077706416598-79

EFIC – European Furniture Industries Confederation - Transparency Register number: 95910795422-52

ELO – European Landowners' Organization - Transparency Register number: 36063991244-88

EOS – European Organisation of the Sawmill Industry - Transparency Register number: 024776016336-52

EPF – European Panel Federation - Transparency Register number: 572064811767-22

EPLF- European Producers of Laminate Flooring - Transparency Register number: 899484345328-53

FECOF - Federation Europeenne des Communes Forestieres - Transparency Register number: 22553705184-17

FEFAC – European Feed Manufacturers' Federation - Transparency Register number: 77105321408-83

FEFPEB - European Federation of Wooden Pallet and Packaging Manufacturers - Transparency Register number: 924074750032-19

FEP - European Parquet Federation - Transparency Register number: 294492727880-53

UECBV - The European Livestock and Meat Trades Union - Transparency Register number: 4422649896-52

