

Brussels, 21 May 2025

European Commission President
Dr. Ursula von der Leyen
Rue de la Loi/Wetstraat 200
1049 Brussels
BELGIUM

Email via Head of Cabinet: bjoern.seibert@ec.europa.eu

Joint request for inclusion of EUDR in an Omnibus for simplification

Dear President von der Leyen,

The European Panel Federation (EPF), the European Furniture Industries Confederation (EFIC), the European Parquet Federation (FEP), the Association of European producers of Laminate Flooring (EPLF) and the European Organisation of the Sawmill Industry (EOS) are part of the Forest-Based Industries. Forest-Based Industries collectively account for 4 million direct jobs, turnover €520 billion (around 18% of the bioeconomy), and offset 20% of EU fossil emissions. We respectfully address you today on the topic of the EU Deforestation Regulation (EUDR).

EPF and the signatories support unreservedly the ambition to halting deforestation globally. We value sustainability of our core resource and as such have engaged with DG ENV from the outset and are part of the EUDR Expert Group¹. We applauded the 12-month transition period at the end of 2024 that avoided market chaos. Likewise, we were encouraged by the recently updated EUDR FAQs and Guidelines promising a 30% reduction in burden, albeit we estimate the saving to be less than that and recall that these are non-binding. While some questions are still open, we appreciate some of the solutions for simplification provided with the last updates. However, the updated FAQs and Guidance do not bear any legal value which likely will lead to an uneven and unharmonised implementation among Member States and among market players. The solutions provided in these non-binding documents would need to be hence transferred to the legal text. Throughout all of the above and despite extremely challenging current market circumstances, the sector has made every effort to ensure EUDR compliance, including significant investments of capital and resources.

As EUDR implementation advances, we acknowledge the Commission's broader commitment to ensuring EU competitiveness. Unfortunately, and despite the recent improvements made, the EUDR remains on a pathway towards the reversal of this, placing EU wood sector companies at a competitive disadvantage towards exporters of the same products to Europe as well as for global export markets. Fortunately, you have seen similar dangers elsewhere and thus the Omnibus programme has been launched.

We hereby formally ask you to include EUDR in an Omnibus without delay, with the goal of delivering both meaningful simplification and targeted improvements, based on the clarifications of the FAQs and guidance document where applicable. This should ensure that compliant EU actors will not be penalised by the ambition of EUDR. It is our hope and goal that a reworked EUDR may be successfully implemented after a 'stop the clock' that is likely to be needed for this.

¹ [Commission Expert Group/Multi-Stakeholder Platform on Protecting and Restoring the World's Forests, including the EU Timber Regulation and the FLEGT Regulation \(E03282\)](#)

Wishing to be constructive, we suggest three potential enhancements for EUDR:

- 1) **Introduction of a new additional 'Insignificant Risk' category;**
- 2) **Focus on first placement on the market;**
- 3) **Targeted controls on 'High-Risk' countries.**

The 'Insignificant Risk' category should be introduced for those countries where there is no or negligible risk of deforestation. This would likely include most EU countries. This could easily be established by the country benchmarking process as the necessary data already exists. The reporting requirement for these countries could therefore be significantly reduced. The primary benefit would be a considerable reduction in reporting demands for these low-risk nations, thereby cutting red tape while upholding the Regulation's objectives of preventing deforestation and forest degradation. To ensure this targeted efficiency does not inadvertently create loopholes or undermine the Regulation's core strength against circumvention, it is essential to draw lessons from current challenges, such as the circumvention of EUTR rules for plywood imports (as referenced by DG FISMA, 2025²), and establish robust safeguards and control mechanisms.

Focusing the due diligence obligation solely on the first operator or trader placing a relevant product or commodity on the EU market (including EU-sourced roundwood and also imported raw materials, semi-finished, or finished wood products from outside the EU) is the most effective way to ensure that only deforestation-free products are placed on or exported from the EU. This approach allows targeted control at the stage where deforestation risks can be effectively identified and mitigated. This is typically at the point of transfer between loggers and wood processors or at the placement of the market of roundwood.

By limiting the full due diligence responsibility to this first placement, the Regulation can maintain high environmental integrity while significantly reducing the administrative burden and costs across the supply chain, for both companies and competent authorities. This is particularly important for SMEs and for operators dealing with composite or processed products further down the value chain. It also improves legal clarity, facilitates harmonised enforcement among Member States, and strengthens the competitiveness of EU-based companies.

Targeting 'High-Risk' countries is logical. With resources stretched across Europe, it is important to focus on shipments and value chains that are more likely to lead to deforestation. Compliance will be an important part of EUDR. Time and energy will be needed, and it is in short supply. The limited facility that Member States have should be consciously aimed where it is most effective.

Now that the country benchmarking process appears to identify only a very limited number of countries, only four it seems, as 'High-Risk', the necessity for uncompromising compliance becomes even more critical. Such a limited classification risks undermining the effectiveness of the Regulation unless it is matched with strict enforcement across all Member States. This would be essential to ensure the credibility and robustness of the Regulation's enforcement, prevents circumvention through mislabelled origin or transshipment, and preserves a level playing field for EU companies that have already heavily invested in compliance.

We respectfully urge you to consider the above proposals, in the constructive spirit in which they are offered. This appeal is made with reluctance, yet out of necessity, if we are to prevent a vital sector of the EU bioeconomy from being inadvertently, but inevitably, placed at a significant disadvantage under the current design of the EUDR. With the implementation deadline fast approaching and many operational uncertainties still unresolved, a rapid and decisive intervention is now essential to ensure predictability and secure market stability. We thank you for your consideration and would be willing to meet you or your representatives to discuss this at your convenience.

Yours sincerely,

Clive Pinnington,
EPF - Managing Director

² https://finance.ec.europa.eu/publications/eu-sanctions-alert-high-risk-circumvention-import-plywood_en



Gabriella Kemendi
EFIC – Secretary General

Isabelle Brose
FEP - Managing Director

Feriel Saouli
EPLF - Managing Director

The following signatory expresses their full support for the global ambition to halt deforestation, nevertheless call for the inclusion of the EUDR into an Omnibus for simplification before entry into application while not necessarily endorsing every element of the accompanying text.

Silvia Melegari
EOS – Secretary General