

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

5 May 2025

Dear President von der Leyen,

On 15 April 2025, the European Commission published revised documents for the implementation of the EU Deforestation Regulation (EUDR). However, the proposed adjustments do not contribute to your stated political goal of strengthening the competitiveness and resilience of the European economy.

The documents provide only minor clarifications and fall short of ensuring legal certainty in the practical implementation of the EUDR. With each new presentation of guidelines and FAQs, the complexity of the EUDR's implementation regime increases. Contradictions between different documents are emerging, with guidelines and FAQs now offering conflicting answers to the same questions. The Commission's claim that the administrative burden for companies could be reduced by 30% is not comprehensible to us in any way. This growing volume and complexity of non-binding accompanying documents creates new legal and economic risks. These documents may even encourage interest groups to pursue legal action against national implementations or specific companies.

The updated documents still fail to address the EUDR's fundamental problem: the regulation offers no added value in proportion to the bureaucratic burden it imposes. Forest owners and downstream businesses are required to prove, for every single piece of timber, that it does not originate from deforestation – even though large-scale deforestation primarily occurs outside Europe.

Drawing on a clear understanding of how business processes work in reality, we have repeatedly highlighted the regulation's shortcomings, proposed alternatives, and pointed out critical flaws in its feasibility. If left in its current form, the EUDR will harm the European economy and become a reputational liability for EU policy. It is time for alternative solutions.

A reformed EUDR that truly combats global deforestation without undermining local industries or weakening the EU's legitimacy in rural regions should be built around the following principles:

- Introduction of an additional "insignificant risk" category for countries that can demonstrate that the risk of deforestation is effectively nonexistent. This would allow for significant simplification for operators. Instead of the current extensive information requirements, companies operating in "insignificant risk" countries would only need to meet documentation obligations – similar to the current EU Timber Regulation (EUTR).
- Focus on first placement on the internal market. The objective of the EUDR is to prevent raw materials and products linked to deforestation from entering the EU market. Achieving this goal does not require comprehensive documentation throughout the entire production chain in Europe. A more proportionate and effective approach would be to require origin documentation at the point of wood transfer between forestry operations and processing companies or timber traders.

- Focus on "high-risk countries" and targeted controls instead of general suspicion. Large-scale deforestation occurs outside Europe. In fact, Europe's forest area has increased by 14 million hectares since 1990. Despite this, the EUDR requires market participants to prove that no deforestation has occurred in their supply chains. A smarter solution would be for the Commission and the competent authorities in Member States to assess deforestation risks. Based on this, targeted actions could be taken – focusing on certain products, regions, or companies. Where deforestation is identified, placing products on the market or trading them could be specifically prohibited. Similar risk-based approaches are already applied in other EU regulations, such as the Regulation on Forced Labour.

These principles would allow the EUDR to meet its objectives with far less complexity and bureaucracy. However, achieving this requires amending the legal text of the regulation itself. We therefore once again call for the inclusion of the EUDR in a future Omnibus package for reducing bureaucratic burdens, and we urge a fundamental simplification or full repeal of the regulation. We respectfully ask you to steer the Commission in the right direction – towards smarter, less bureaucratic, and more targeted policymaking – and to take our proposals into account. We are at your disposal for further dialogue at any time.

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