Brussels, 27 October 2025

OPEN STATEMENT: A Call to 'Stop the Clock' and Ensure a Workable EU Deforestation Regulation

The signatories of this open statement recall that the effectiveness of any legislative framework depends on its workability, legal clarity, and predictability. The recent amendments proposed by the European Commission to the EU Deforestation Regulation (EUDR) after the announcement of a further postponement on 23 September, prolong a situation of costly uncertainty and unrealistic implementation timelines. The new proposal, and the very challenging timeline to have it approved, risks undermining both the credibility and the practical enforcement of the Regulation, while placing European operators in an untenable position of legal and operational uncertainty.

The changes introduced by the Commission are substantial and deserve appropriate time for stakeholders, policy makers and Member States to analyse and discuss them. This is exceptionally difficult considering the deadline of 30 December 2025 currently in place. It's unrealistic and unacceptable to expect that companies will be ready to comply right away with a regulation that has been hastily renegotiated only few weeks before entry into application. In fact, most large downstream industries will not be in the position to adapt again their IT systems, which have been designed to interact with the TRACES platform, whereas small and micro downstream operators will be faced with a much larger number of DDS reference numbers as these accumulate along the value chain. Downstream operators of all sizes will face compliance problems with the new rules, which in the best-case scenario will be adopted only few days before the entry into application.

The proposal further fails to reflect the operational reality of the market, where medium-sized and large companies routinely interact with small and micro-enterprises within integrated supply chains. As a result, establishing different application dates – with large and medium enterprises required to comply from 30 December 2025, and small and micro-enterprises benefiting from twelve additional months, will, in practice, force all operators to comply from the same date. The interdependence of companies within the value chain makes the proposed postponement illusory, as smaller operators will be required to align immediately to maintain business relations.

Our sectors continue to face a serious deficit of clarity and legal certainty, which conflicts with a fundamental right guaranteed under EU law and which remains indispensable for sound business operations, competitiveness, and investment.

We therefore urge the European Commission to introduce a "stop-the-clock" mechanism that allows for policymakers to have a proper and a comprehensive assessment of the Regulation's impact and implementation. Such a reassessment should aim to identify genuine simplification measures and to render the EUDR obligations truly workable, while fully preserving the Regulation's legitimate environmental objective of combating deforestation, a goal strongly supported by the signatories of this open statement.

APAG – Oleochemicals Europe - Transparency Register number: 64879142323-90

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 open statement).*

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

CEPI - European Confederation of the Pulp & Paper Industry - Transparency Register number: 72279144480-58

CESIO - European Committee of Organic Surfactants and their Intermediates - Transparency Register number: 64879142323-90

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

ETTF - European Timber Trade Federation - Transparency Register number: 151485550468-20

FEP - Federation of European Publishers - Transparency Register number: 3985 41467-53

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

INTERGRAF – European Trade association of the graphic industry - - Transparency Register number: 15519132837-45

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


APAG
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CEIB


CEPF
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cesio


COCERAL


copa cogeca
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EUROPEAN PANEL FEDERATION
WOOD-BASED PANELS


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