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 - TRN 64879142323-90

Bioenergy Europe - TRN 97810874431-67

CEI-Bois - European Confederation of Woodworking Industries - TRN 470333818389-37 (*with the exception of Metsäteollisuus ry and Puutuoteteollisuus ry, which will not co-sign this open statement).*

CELCAA - European Liaison Committee for Agricultural and Agri-food trade - TRN 546282614966-51

CEPF - Confederation of European Forest Owners - TRN 3647455667-08

CEPI - European Confederation of the Pulp & Paper Industry - TRN 72279144480-58

CESIO - European Committee of Organic Surfactants and their Intermediates - TRN 64879142323-90

CITPA - The International Confederation of Paper and Board Converters in Europe - TRN 82090737179-17

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

COPA-COGECA - European Farmers and Agri-Cooperatives - TRN Copa 44856881231-49 | Cogeca: 09586631237-74

COTANCE - Confederation of National Associations of Tanners and Dressers of the European Community - TRN 077706416598-79

ECF - European Coffee Federation - TRN 958482431512-92

ECMA - European Carton Makers Association - TRN 948591610750-02

EDANA - Association of the nonwovens and related industries - TRN 0120704687-67

EFIC - European Furniture Industries Confederation - TRN 95910795422-52

ELO - European Landowners' Organization - TRN 36063991244-88

EOS - European Organisation of the Sawmill Industry - TRN 024776016336-52

EPF - European Panel Federation - TRN 572064811767-22

EPLF - European Producers of Laminate Flooring Association - TRN 899484345328-53

ETTF - European Timber Trade Federation - TRN 151485550468-20

FEP - Federation of European Publishers - TRN 3985 41467-53

FECOF - Federation Europeenne des Communes Forestieres - TRN 22553705184-17

FEDIOL - The EU Vegetable Oil and Proteinmeal Industry - TRN 8507600232131

FEFAC - European Feed Manufacturers' Federation - TRN 77105321408-83

FEFCO - European Federation of Corrugated Board Manufacturers - TRN 716182712301-64

FEFPEB - European Federation of Wooden Pallet and Packaging Manufacturers - TRN 924074750032-19

FEP - European Parquet Federation - TRN 294492727880-53

INTERGRAF - European Trade association of the graphic industry - TRN 15519132837-45

UECBV - The European Livestock and Meat Trades Union - TRN 4422649896-52

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EIB

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cesio

ditpa

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copa cogeca
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COTANCE

EUROPEAN
COFFEE
FEDERATION

ECMA
EUROPEAN
CARTON
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edana
The voice of NONWOVENS

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EUROPEAN PANEL FEDERATION
WOOD-BASED PANELS

EUROPEAN LAMINATE
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FEDERATION OF EUROPEAN PUBLISHERS
FÉDÉRATION DES ÉDITEURS EUROPÉENS

FECOF

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