

Dear Minister,

We welcome the progress made by the European Commission and the EU Member States in their preparation for the entry into application of the EUDR by 30 December 2025. The updated versions of the guidance and the FAQ as well as the delegated act on the product scope of the EUDR include welcome simplifications and clarifications that will reduce administrative costs and burden for companies.

We would like to emphasize that our organizations have made significant investments to prepare for the entry into application by the end of 2025. With seven months to go, the European Commission, EU Member States and companies should mobilize all necessary resources to implement the EUDR as planned.

While we support further simplifications in general, we believe these could be best addressed through further updates to the FAQ. Given the temporary uncertainty around the entry into application at the end of 2024, the few remaining months until the end of 2025 and the simplifications included in the guidance and the FAQ, we strongly oppose any calls suggesting further amendments to the EUDR – such as adding a zero-risk category – that would require another legislative process. This would only serve to increase uncertainty and jeopardize the significant investments our companies have made in preparing for its application. Assuring regulatory certainty should be the top priority to ensure the competitiveness of EU companies.

In volatile times like ours, we strongly encourage to provide legal certainty, stability and predictability and to foster cooperation – for the private sector and its partners around the globe.

We also call on the European Commission, European Member States and the corporate sector to provide appropriate support for the implementation of the EUDR for smallholder farmers and their organisations so that the costs of compliance are not passed to them and they are not excluded from the EU market due to a lack of resources.