JOINT STATEMENT

Urgent call of European primary producers and industries for the postponement of the entry into application of the EUDR

Dear Honourable President Von der Leyen,

The undersigned organisations representing the European primary producers and various industries impacted by the EUDR fully support the fight against deforestation. This is critical to mitigate climate change, preserve biodiversity and ensure reliable and sustainable raw materials and supply chains.

However, less than six months before the entry into application of obligations for operators, traders and Competent Authorities, we are facing substantial legal and market uncertainties. We still have no comprehensive responses to our repeated calls raised in the past year since the entry into force of the Regulation. Namely, we have asked for clarity, for a workable and harmonised implementation of the regulation. In addition, we have stressed how important it is to make the EU Information System accurate for users' requirements and to have the benchmarking ready, especially for low-risk countries.

Inadequate and missing tools and insufficient preparation time for the implementation are likely to cause serious disruptions to the EU and world markets. This will affect the competitive position of the European primary producers and downstream industries and will weaken the security of supply, triggering additional inflationary pressure for consumer goods, resulting from loss of market access to essential EU food, feed and forest supply chains.

For many months now, operators and traders working on EUDR implementation have urged the European Commission and the Member States to allocate appropriate resources, to accelerate the preparation, to develop workable solutions and to provide the necessary clarifications, both on general requirements of the Regulation and on commodity-specific problems. All supply chain actors need to receive such clarifications to adjust their practices in compliance with the Regulation, and this cannot be done within few weeks or months.

In this context, it is of utmost importance today that the European Commission takes the time needed to reconsider the timeline and readiness for the implementation of the Regulation. The European Commission needs to build a common understanding of the implications of the Regulation for all Member States and actors, including SMEs, and set in place effective and efficient compliance tools. In addition, the European Commission and the Member States need to put in place a mechanism that includes effective measures to address possible supply chain disruptions and barriers to access to markets.

EU Agriculture Ministers sent last April a strong call on the urgent need to address simplification and the disproportionate administrative burden revealed in the national implementation process. This was supported by the Commissioner for Agriculture who proposed to consider deferring the date(s) of application of the EUDR and to swiftly examine simplification measures. A new call will be made in the EU Agriculture and Fisheries Council on 15 July.

We have well-founded reasons to think that the current timeline before entry into application is not realistic. We therefore urge the European Commission to take action and

postpone the entry into application to enable a reasonable time frame for the necessary preparation.

We remain committed to work with you in finding workable solutions for the effective implementation of the EUDR and hope that our concerns will be considered by the European Commission and Member States.

Your faithfully,

Signatories:

CCB - Cepi ContainerBoard

CEI-Bois- European Confederation of Woodworking Industries

CEPF- Confederation of European Forest Owners

CEPI- Confederation of European Paper Industries

Coceral- European association of trade in cereals, oilseeds, rice, pulses, olive oil, oils and fats, animal feed and agrosupply

Copa Cogeca- European Farmers and European Agri-Cooperatives

ECMA - European Carton Makers Association

EDANA - Nonwovens Industry

ELO- European Landowners' Organisation

ENPA – European Newspaper Publishers' Association

ETS – European Tissue Symposium

EUSTAFOR- European State Forest Association

FEFAC- European Feed Manufacturers' Federation

FEFCO – European Federation of Corrugated Board Manufacturers

FEP – Federation of European Publishers

INTERGRAF – European Federation for Print and Digital Communication

NME – News Media Europe

PRO Carton - European Association of Carton and Cartonboard manufacturers

UECBV- The European Livestock and Meat Trades Union

Cepi ContainerBoard

































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