

Brussels, 29 October 2024

Honourable Roberta Metsola  
President of the European Parliament

H.E. Charles Michel  
President of the European Council

H.E. Ursula von der Leyen  
President of the European Commission

H.E. Bálint Ódor  
Permanent Representative of Hungary to the European Union  
Presidency of the Council of the European Union

Dear Excellencies,

This group of developing countries has expressed, on two previous occasions, our deep concern with the European Union's Deforestation Regulation (EUDR). We, therefore welcome the European Commission's recent proposal to postpone the regulation's application date and urge the European Council and the European Parliament to approve this postponement.

The proposed postponement is a step in the right direction. It shows that the Commission has listened to our concerns regarding the implementation timeline and the lack of time and guidance for producers and exporters.

Nevertheless, this postponement needs to be followed by extensive efforts to resolve many of our concerns with the EUDR that have not been addressed in the additional documents recently published by the Commission, including the Guidance Document and the Strategic Framework for International Cooperation Engagement on Deforestation.

From the outset, we have consistently opposed the benchmarking system as a discriminatory and unnecessary mechanism. It imposes different rules on countries, disadvantages those countries with high forest coverage, and creates incentives for trade diversion, thereby undermining even sustainable and deforestation-free production and ultimately harming these countries' sustainable development. We call on the EU to abandon this system.

We also remain concerned with the "one-size-fits-all" approach of the regulation, that does not take into account the specificities and common practices of each supply chain, national policies such as those of crop substitution and the challenges faced by smallholders in third countries, as well as the existence of systems, certificates and databases that have delivered positive, consistent and verifiable results in many countries, using their own parameters and criteria. Moreover, the persistence of inaccuracies in the Global Map of Forest Cover 2020, particularly the misidentification of agricultural areas, also continues to be a significant concern.

While the EU has proposed some technical cooperation initiatives, they remain insufficient for the scale of the challenges our producers, many of them smallholders, will face.

We urge the EU to build on the positive steps it has taken by focusing its efforts on addressing and correcting critical problems in its current approach, as well as on promoting more tangible cooperation and dialogue with its partners, including in future revisions of the legislation. With this, we would be more likely to align our shared goals and practices of environmental conservation and sustainable development, while avoiding any negative impacts on trade.

The signatories, as always, are ready for consultations with the EU, in order to find solutions to our concerns and challenges.

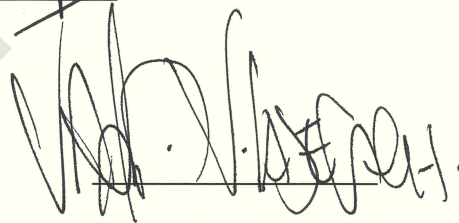
Please accept, Excellencies, the assurances of our highest consideration.

Sincerely yours,

María Constanza Crespo  
Chargée d'Affaires, a.i., of Argentina to  
the European Union



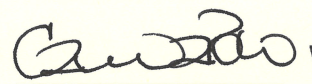
H.E. Valeria Denisse Vilaseca Chumacero  
Ambassador of Bolivia



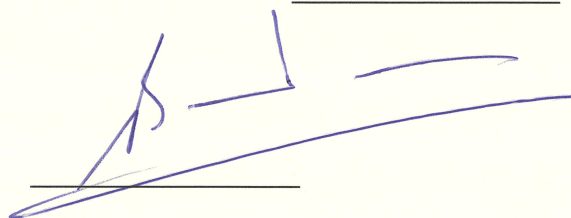
H.E. Pedro Miguel da Costa e Silva  
Ambassador of Brazil to the European Union



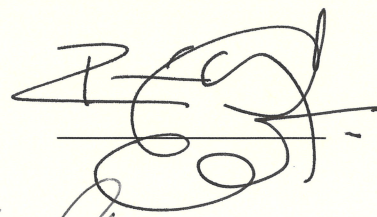
Camila Polo Flórez  
Chargée d'Affaires, a.i., of Colombia



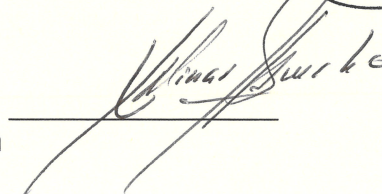
H.E. Abou Dosso  
Ambassador of Côte d'Ivoire



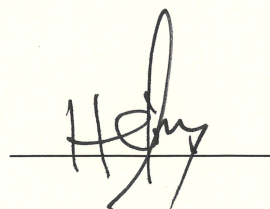
H.E. Iván Emilio de Js. Ogando Lora  
Ambassador of the Dominican Republic



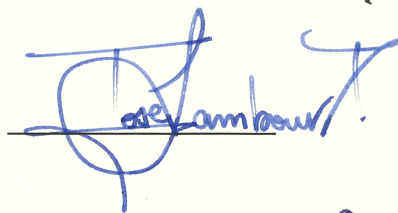
H.E. Xavier Aliaga Sancho  
Ambassador of Ecuador to the European Union



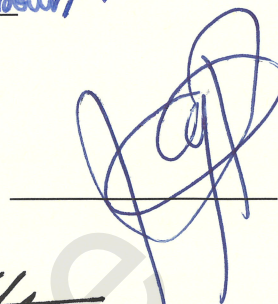
H.E. Henry Tachie-Menson  
Ambassador of Ghana



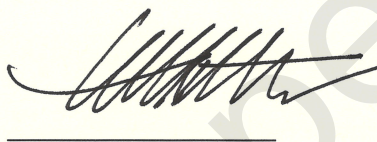
H.E. José Lambour Peñalongo  
Ambassador of Guatemala



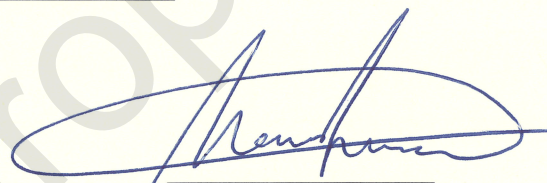
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Ambassador of Honduras



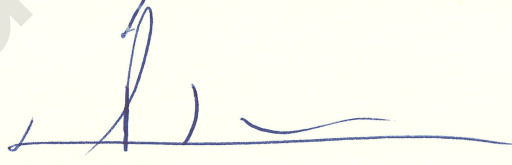
H.E. Andri Hadi  
Ambassador of the Republic of Indonesia



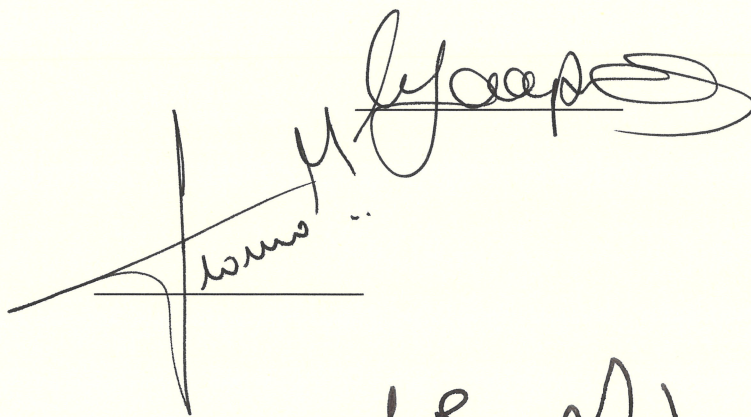
H.E. Dato' Mohd Khalid Abbasi Abdul Razak  
Ambassador of Malaysia



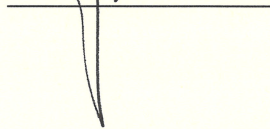
H.E. Rogelio Granguillhome Morfin  
Ambassador of Mexico



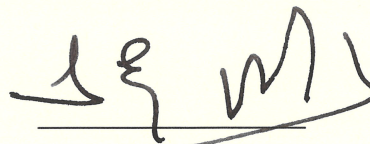
H.E. Mekondjo Kaapanda-Girrus  
Ambassador of Namibia



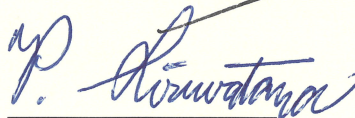
H.E. Enrique Miguel Franco Maciel  
Ambassador of Paraguay



H.E. Luis Enrique Chávez Basagoitia  
Ambassador of Peru



Patcharamon Siriwatana  
Chargé d'Affaires, a.i., of Thailand



CC.

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Executive Vice-President for the European Green Deal

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High Representative of the European Union for Foreign Affairs  
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Commissioner for Trade and Executive Vice-President for an Economy  
that Works for People

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Commissioner for Agriculture

H.E. Virginijus Sinkevičius  
Commissioner for the Environment, Oceans and Fisheries

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Chairman of the Progressive Alliance of Socialists and Democrats Group

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Chairman of the Patriots for Europe Group

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Co-Chairmen of the European Conservatives and Reformists Group

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President of the Renew Europe Group

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of the European Parliament

Honourable Bernd Lange  
Chair of the Committee on International Trade of the European  
Parliament

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Director General of ENVI

H.E. Sabine Weyand  
Director General of TRADE

H.E. Simon Mordue  
Deputy Secretary General of the European External Action Service

Agence Europe