



Confederation of European Forest Owners



european farmers

european agri-cooperatives



European Landowners' Organization



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## **Joint Statement - Further steps are needed to ensure that the simplification of the EU Deforestation Regulation (EUDR) becomes a workable reality for European farmers, forest owners and their cooperatives**

While the European farming and forest sectors welcomed last year's targeted simplification for micro and small primary operators as a positive step towards greater proportionality, the current preparation work shows that further efforts are needed. The undersigned organisations are putting forward concrete and constructive proposals for simplification of the Regulation. Taking them into account will ensure that the Regulation can be implemented effectively in practice.

The one-year postponement of the EUDR's application has provided helpful additional time for preparation. However, in the context of ongoing market uncertainty, rising production costs, and increasing regulatory demands, farmers and forest owners continue to face significant pressure and increased reporting obligations. We regret that simplification is not sufficiently reflected in practice, as European farmers and forest owners continue to face complex procedures and significant administrative burden for the implementation of a regulation designed to address deforestation, happening far away from their own land.

The upcoming simplification review, to be presented by 30 April 2026, offers an important opportunity to build on the progress made so far. It will be essential that this process delivers practical and workable solutions that address the remaining implementation challenges for farmers and forest owners. Continued efforts towards simplification, alongside appropriate implementation timelines, will be key to ensuring a smooth transition.

Since the entry into force of the new rules, farmers, forest owners, and their cooperatives have engaged constructively with their national authorities to identify feasible approaches for implementation. This cooperation has been valuable, but it has also highlighted areas where the current framework could be further streamlined to better reflect realities at farm and forest level, as the current text of the regulation remains difficult to be applied.

## Concrete suggestions

The main objective to ensure proportionality and simplification for micro and small operators should be that they are not required to submit the simplified declaration and that Member States will ensure to link their national systems and enhancing their interoperability with the EUDR information system.

In addition, a strong cooperation with forest and farmers associations, producer groups and cooperatives is needed to coordinate submitting of simplified declarations by the Member States.

Similarly, where certain requirements—such as the reporting of estimated quantities—prove difficult to implement and where this information does not significantly enhance traceability, the inclusion of this information in the simplified declaration could be reconsidered.

Also, there is uncertainty as to whether a declaration should be updated only in the event of substantial changes or whether even minor changes must be reported. This increases the unpredictability for the whole agri-forest sector as changes such as amount of harvested biomass or the location of production site are common when dealing with biomass. A system that demands constant updates is not simplified; it is unmanageable in practice. In light of the changes introduced by the revised Regulation, the intensity of checks should be also reduced for primary operators by substantially amending the relevant articles in the Regulation.

In countries classified as low risk, it may also be appropriate to extend the simplified regime to all primary producers, irrespective of size. The risk of deforestation within a country classified as low risk does not depend on the size of primary producers, but rather on the forest and nature conservation laws in force within such country and the effectiveness of their enforcement. Furthermore, existing EU and national databases already provide a solid basis for traceability.

## Conclusion

Taking into account the current economic context and the need for workable solutions on the ground, allowing sufficient time for implementation remains important. A carefully considered start of the entry into application, combined with further targeted simplification in the text of the Regulation, would support the effective achievement of the Regulation's objectives while safeguarding the viability of European agriculture and forest sectors.

The European farming and forest communities remains fully committed to the objectives of the EUDR and stands ready to continue engaging constructively with EU institutions and national authorities. Ensuring that the framework is practical, proportionate, and aligned with on-the-ground realities will be essential for its long-term success.

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