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Joint statement on the Commission proposal for EUDR revision

The undersigned sawmill, pulp and paper industry associations from Austria, Estonia, France, Italy, Latvia and Sweden believes that the EUDR process is deeply concerning. First announcing a one-year postponement, only to then reverse course and propose substantial changes without allowing time for companies to prepare, is unacceptable. This approach creates significant uncertainty and undermines trust in the regulatory framework. There is an urgent need to resolve this situation, and the EUDR must now – once and for all – be simplified to ensure it is workable and proportionate.

The Commission's proposal to clarify the distinction between first and downstream operators under the EUDR, and to remove the due diligence and reporting obligations in the EU information system for downstream operators, is an important step in the right direction.

Remove the requirement to transmit reference numbers

Despite this, the requirement for downstream operators to collect and forward reference numbers remains. This does not create meaningful traceability but instead leads to extensive administrative burdens and new costs, undermining the goal of simplification. This requirement must be removed.

In industrial flows, the number of reference numbers quickly becomes unmanageable – a single product may be linked to tens of thousands of harvesting sites, creating an illusion of traceability rather than actual transparency.

Our member companies have already invested tens of millions of EUR in EUDR implementation systems that are not designed to handle this volume of reference numbers. Developing new systems under current economic conditions is not sustainable. Maintaining internal registers of suppliers and customers is a far more efficient and less burdensome method to achieve supply chain transparency.

For example, in a paper mill, a single product unit or delivery could be linked to 20,000 harvesting sites based on theoretical traceability models. Conversely, one harvesting site could be connected to 7 million cubic meters of wood and products worth over one billion euros. In practice, it becomes extremely difficult for companies and authorities to draw



meaningful conclusions from the vast number of reference numbers passed along the supply chain.

Moreover, the transmission of the declaration identifiers infringes the competition regulation. For instance, if a forest operator (i.e. a small primary operator) delivers roundwood to a sawmill, the sawmill will receive from its supplier its declaration identifier. When the sawmill delivers woodchips to a pulp mill, the sawmill will have to pass through this declaration identifier. If the pulp mill also has the forest operator as supplier, it will be easy to “identify” the number, meaning that the pulp mill will know “who are the suppliers of its supplier”, which is not acceptable from a business competition law perspective.

If the reference number requirement remains, the implementation date must be postponed – it is unreasonable to introduce such a technically complex requirement without giving companies sufficient time to adapt.

Unclear responsibilities for downstream operators

There are still unacceptable uncertainties regarding how product bans should be handled. If an error is detected somewhere in the chain, large volumes of material risk becoming non-compliant, leading to significant costs and production stoppages. It is unclear how downstream operators will be subject to proportionate handling of product bans, corrective actions, and sanctions. At the very least, due diligence obligations for downstream operators in cases of substantiated concerns should be removed.

Three essential amendments to the Commission’s proposal

Given the urgency and tight timeline for the co-legislators, we propose three targeted amendments that resolve the above described issues and offer significant benefits:

- Real regulatory simplification and increased legal clarity
- Companies can build on existing implementation efforts
- Reduced pressure on the Commission’s IT system
- More effective enforcement focused on parts of the value chain where deforestation actually can occur
- The purpose of EUDR is upheld, ensuring only compliant products gain access to the EU market

Proposed changes to the EUDR proposal Amendment 6 – Article 5 Obligations of downstream operators and traders

Art 5.3	Downstream operators and traders shall collect and keep the following information relating to the relevant products they intend to place or make available on the market or export: (a) the name, registered trade name or registered trade mark, the postal address, the email address and, if available, a web address of the operators, downstream operators, or the traders who have supplied the relevant products to them, as well as the reference numbers of the due diligence statements or the declaration identifiers associated to those products; (b) the name, registered trade name or registered trade mark, the postal address, the email address and, if available, a web address of the downstream operators, or the traders to whom they have supplied the relevant products.	<i>Justification:</i> The obligation for downstream operators to collect and transfer reference numbers should be removed. It does not contribute to meaningful traceability but instead imposes significant administrative burdens and costs. In industrial production, the volume of reference numbers quickly becomes unmanageable, creating complexity without clarity. Existing systems – already heavily invested in – cannot handle this scale, and building new ones is not economically viable. Maintaining internal supplier and customer registers is a more effective and less burdensome way to ensure transparency.
Art 5.5	Downstream operators and traders shall communicate to downstream operators and traders to whom they have supplied relevant products the reference numbers of the due diligence statements or the declaration identifiers associated to those relevant products.	<i>Justification:</i> Same as above.
Art 5.7	5.7. If non-SME downstream operators and non-SME traders obtain or are made aware of relevant information, indicating that a relevant product is not in compliance with the requirements set out in this Regulation, prior to placing or making available on the market or exporting, they shall immediately inform the competent authorities of the Member States in which they intend to place or make available on the market or from which they intend to export the relevant product. In the case of substantiated concerns, they shall verify that due diligence was exercised and no or only a negligible risk was found. They shall not place or make available products on the market or export them unless the verification demonstrates no or only a negligible risk of non-compliance.	<i>Justification:</i> The requirement on downstream operators and traders to conduct due diligence in cases of substantiated concerns, should be deleted. According to the revised text, these actors are otherwise not obligated to carry out due diligence, and it remains unclear whether they can realistically do so without support from national authorities. This change introduces new obligations for traders that do not exist in the current regulation and risks creating legal uncertainty and disproportionate burdens.



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