



Mrs Ursula von der Leyen
President of the European Commission
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Dear Commission President
Dear Ursula von der Leyen

Deforestation-free products regulation (EUDR)

Congratulations on your re-election! This is most welcome news on many levels not least in relation to your New European Bauhaus which we, as you know, are supporting via our active membership of Wood4Bauhaus.

We were particularly pleased at the observation you made in your re-election speech in Strasbourg where you rightly stated, “We all know there is no Europe without SMEs. They are the heart of our economy. Therefore, let us get rid of the burdensome micromanagement, and give them more trust and better incentives.”

Alas, a prime example of such ‘burdensome micromanagement’ is the EU’s own EUDR which clearly puts the European manufacturing sector at a disadvantage on the international stage and creates significant additional administrative burdens for our companies. In the current geopolitical and geoeconomic context, the EU green economy - of which the European wood and furniture industries are a significant player - must remain competitive and pursue a growth policy, while rightly also striving to reach agreed climate and environmental targets. However, a

competitive Europe can only be achieved through realistic policies and implementable measures, all of which need to pass the proportionality and necessity tests.

The EUDR obligations to which our industries are now subject need to be implemented by law in **a shorter timeframe than has ever been imposed on any other industrial sector** affected by comparable European legislation. As a consequence of the unprecedented tightness of the deadline, **the transition period envisaged does not enable the objectives assigned to it to be met before the deadline expires**. Moreover, in view of the current absence of country benchmarking and the late time-limit for the adoption of the relevant implementing acts, the EUDR benchmarking rules are deprived of any effectiveness and cannot fulfil the stated objective of reducing the regulatory burden for operators and traders in the most critical moment for them, i.e. the implementation of the new obligations. Indeed, operators and traders will need to apply a higher level of scrutiny in their due diligence irrespective of the origin of the products in preparation for the implementation of the EUDR.

Therefore, it is of utmost importance that a delay of the entry into application of the EUDR is granted.

Please be assured that our industries strongly condemn illegal logging and deforestation and hence we support the aims of the EUDR. We believe that from an environmental point of view, these activities cause irreparable damage leading to a loss of biodiversity. From an economic point of view, illegal logging disrupts markets and drives down timber prices, resulting in unfair competition that hampers efforts to implement sustainable forest management. At the same time, deforestation has a direct and negative impact on the availability of wood, which is vital to the very existence of our sector. Consequently our industries are understandably at the forefront of the fight against illegal logging and deforestation.

In conclusion, against this background, in order to combat deforestation and translate the objectives of the EUDR into positive results, it is essential that our companies are placed in a position to effectively implement the obligations of the regulation within a credible timeframe, in particular by putting in place the appropriate instruments. This will only be possible if the EU grants as soon as possible an adequate delay in the implementation of the EUDR.

Yours Sincerely
Silvia Melegari

Signatories:

CEI-Bois - European Confederation of Woodworking Industries

EU Transparency Register n° 470333818389-37

EFIC: European Furniture Industries Confederation

Transparency Register n° 95910795422-52

EOS - European Organisation of the Sawmill industry

Transparency register n° 024776016336-52

EPF - European Panel Federation

EU Transparency Register: 572064811767-22

ETTF - European Timber Trade Federation

Transparency register n° 151485550468-20

FEP - European Parquet Federation

EU Transparency Register n° 294492727880-53

FEFPEB: Fédération Européenne des Fabricants de Palettes et Emballage en Bois

EU Transparency Register n° 924074750032-19