













To:

Ursula Von der Leyen, President of the European Commission

Teresa Ribera, Executive Vice President for a Clean, Just and Competitive Transition

Stéphane Séjourné, Executive Vice-President for Prosperity and Industrial Strategy of the European Commission

Jessika Roswall, Commissioner for Environment, Water Resilience and a Competitive Circular Economy

Valdis Dombrovskis, Commissioner for Economy and Productivity; Implementation and Simplification

Maroš Šefčovič, Commissioner for Trade and Economic Security; Interinstitutional Relations and Transparency

Brussels, 7 October 2025

Dear President, dear Vice Presidents, dear Commissioners,

## RE: Additional delay to the application of the EU Deforestation Regulation

On 23 September, Commissioner Roswall announced that the Commission intends to propose, for the second time, a delay of the entry into application of the EU Deforestation Regulation (EUDR), alleging the existence of issues with the law's "information system".

We find it astonishing that the EU would not have the resources and capability to build and operate the infrastructure required for the functioning of the EUDR. This infrastructure should have been in place already at the end of 2024 and suggestions that it might not be completed one year later are simply unacceptable. We therefore call on you to urgently and transparently address any outstanding issues with the "information system" and to refrain from causing any

additional delay to the EUDR's application. Instead, you should ensure that this landmark law is implemented in its entirety, as foreseen, on 30 December 2025.

The EUDR was adopted, as part of the European Green Deal, to fulfil the EU's commitment to halt deforestation driven by European consumption. A new delay in the application of this law would have disastrous consequences.

Delays with the implementation of the EUDR have a clear and direct impact on climate and the environment, as well as on the rights of indigenous peoples, and of the communities that depend on forests: at global level, <u>one tree is lost each second due to EU consumption</u> and <u>European forests are not spared from degradation linked to their economic exploitation</u>.

Furthermore, a proposal to delay the EUDR for a second time would undermine the credibility of the EU's regulatory system, tarnish its reputation for environmental leadership at the UNFCCC COP 30, and put its commitment to the Glasgow Leaders' Declaration on Forests and Lands Use in question. In addition, it would call into question your ability to foster innovation and competitiveness: while rewarding the laggards, an additional delay would frustrate the efforts that many businesses have made to ensure their supply chains are compliant with the law and their activities are environmentally sustainable.

Companies and EU member states have invested to meet the EUDR requirements on time. The former prepared their supply chain to be compliant with the law, while the latter prepared their authorities to enforce it. Partner countries and their commodity producers have also used the transition period to ensure their products can be placed on the EU market.

You must honour the efforts and commitments made by companies, national administrations and trade partners, and you must give EU citizens confidence that their consumption will no longer fuel the destruction of forests within and outside the EU. Just a few weeks ago, nearly 200,000 citizens asked the EU not to weaken EU environmental laws. They deserve to be taken seriously. Last but not least, you must fulfil the Commission's primary role in the EU constitutional system: ensuring the effective application of EU law.

We trust that you will fulfill your duties, meet EU citizens' expectations and let the EUDR enter into application in its entirety and in accordance with the agreed timeline.

## Signatories:

ClientEarth

**Environmental Investigation Agency** 

Fern

Forest Peoples Programme

Global Witness

Greenpeace European Unit

WWF European Policy Office