

European Commission
President
Dr Ursula von der Leyen
Rue de la Loi / Wetstraat 200
1049 Bruxelles/Brussel
BELGIUM



24 October 2025

Dear President von der Leyen,

The European Commission's proposals of 21 October regarding the implementation of the EU Deforestation Regulation (EUDR) are absolutely irresponsible. They fail to take into account any suggestions from business practice and completely miss the promised simplifications. We are seriously concerned that the legitimacy of the European Union is being undermined by such unrealistic and impractical legislation.

The Commission's proposal, with its supposed exemptions and reliefs, actually creates even more complexity and bureaucratic burden. Under the newly proposed system, information would still need to be transmitted throughout the entire supply and production chain. The wood industry has simply not been understood, and our practical alternative proposals have once again been ignored. The newly announced relief measures for small companies will bring no real benefit, as supply chains are tightly interconnected. Companies subject to reporting obligations will still have to demand corresponding documentation from EUDR-exempt businesses or cancel orders.

In addition, the Commission's proposal does not provide for a postponement of the EUDR's application, even though Commissioner Roswall indicated such a delay in a letter to the European Parliament at the end of September. This approach destroys the trust of businesses in politics and undermines any planning certainty. The proposal would substantially change the content of the current EUDR without allowing sufficient time for implementation. Most Member States have neither adopted national implementation laws nor designated enforcement authorities. Moreover, the Commission itself has acknowledged problems with the IT system. Under these conditions, another postponement of at least twelve months for all companies is absolutely essential.

The European Commission is risking severe disruptions to supply chains and value networks across Europe and beyond. In its current form, the EUDR cannot be implemented in the wood value chain in a legally secure or economically viable way. From our perspective, there are three constructive options:

- Non-application and repeal of the EUDR
- A "No-Risk Category" within the EUDR based on the principle "No Risk = No Documentation" with a focus on the internal market and the fundamental principle of the free movement of goods.
- Documentation of the first placing on the market without further obligations along the supply chain.

The EUDR is unnecessary, as Europe's forests are already protected by numerous national laws, and timber imports from third countries are regulated under the EU Timber Regulation (EUTR).

You have promised European citizens and businesses to reduce bureaucracy and strengthen Europe's competitiveness. It is time to keep that promise and end the unnecessary bureaucracy that the EUDR has already created — and will continue to create if implemented in its current form.

Yours sincerely,

Association of the **Austrian** Wood Industries



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Mag. Heinrich Sigmund, MSc.
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