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

cc: Mr Antonio Decaro MEP, Chair of the ENVI Committee, European Parliament
cc: Minister Magnus Johannes Heunicke, Chair of the Environment Council

2 October 2025 *[Updated 3 October 2025]*

Dear Ms Roswall,

The European Union Regulation on deforestation-free products (EUDR)

The companies and other organisations which have signed this letter, which operate in the cocoa, dairy, rubber, wood and other agri-food sectors, believe that clear, predictable, and comprehensive regulations on environmental and human rights responsibilities are important for the EU's long-term competitiveness.

Conducting supplier due diligence and implementing traceability systems, as set out in the EUDR, are fundamental aspects of responsible raw material sourcing and good business practice, ensuring

effective risk mitigation and management of negative environmental impacts, including deforestation.

The company signatories to this letter, together with their value chain partners – including smallholder farmers – have been actively preparing and investing in compliance with the current provisions of the EUDR, which we have consistently supported. These efforts have been made in good faith that the European legislative framework and timeline were reliable. We remain on track to achieve full compliance with the EUDR obligations by 31 December 2025.

The proposed delay puts at risk the preservation of forests worldwide, will accelerate climate change impacts, and undermines trust in Europe's regulatory commitments. We deeply regret that a technical IT issue risks jeopardising the EUDR's core objectives and entry into force, three months before the implementation deadline for companies. This approach would introduce considerable uncertainty and stakeholder disengagement and result in additional compliance expenses for businesses, contrary to the intended simplification.

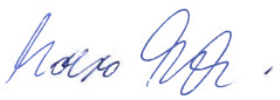
We call on the European Commission to avoid using this issue as grounds to reopen, delay, or change the EUDR. Instead, the Commission should adopt a pragmatic approach:

- If companies are unable to use the Information System or encounter specific technical challenges, these situations should be recognised as *force majeure* for compliance by companies and enforcement by competent authorities.
- A Commission Notice addressed to member states, national competent authorities, and operators should clarify these circumstances and establish a defined timeline (grace period) of not more than six months (reviewable) during which controls will be reviewed and fines suspended.
- The Commission should establish an ongoing technical committee to oversee implementation and facilitate technical discussions between authorities and operators.

We urge the European Commission to provide clarity on its intended next steps as soon as possible to avoid additional uncertainty. Companies need to know what to prepare for, and by when.

We stand ready to continue the discussions on practical solutions that are fit for purpose and do not penalise the long-standing investments of our companies and the higher standards of European businesses.

Yours sincerely



Francesco Tramontin
Vice President Global Public Affairs
Institutional Affairs & Corporate Communications Europe

On behalf of:

Agro Business Group

Alliance pour la Préservation des Forêts – Alliance for the Preservation of Forests

Association Technique Internationale des Bois Tropicaux – International Tropical Timber Technical Association

Cérélia

CID

Exott

Fair Trade Advocacy Office

Ferrero

GT Rubber

Interholco

Mars Wrigley

Namazie International Pte Ltd

Nestlé

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Precious Woods

PT Project Tree Indonesia

Rainforest Alliance

Rougier

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Sri Trang Group

Thaitech Rubber Corporation

Tony's Chocolonely

VOCAL Coffee Alliance

VOICE Network