

Ms Jessika Roswall  
Commissioner for Environment, Water Resilience and a Competitive Circular Economy  
European Commission  
Rue de la Loi 200  
1049 Brussels  
Belgium

Brussels, 24 February 2026

Subject: **Eurochambres input for the simplification review of the EU Deforestation Regulation**

Dear Commissioner Roswall,

Eurochambres welcomes the postponement of the EU Deforestation Regulation (EUDR) and the simplifications introduced in December 2025. These changes address several key concerns raised by the chamber network and provide businesses with much needed time to adapt. However, important issues remain, including the inconsistent application of the once-only principle, leading to unnecessary burdens for downstream operators. **Eurochambres therefore urges the European Commission to ensure that the simplification review delivers a more workable and proportionate EUDR.**

The European business community remains committed to the objectives of reducing deforestation and forest degradation, but these objectives must be achieved in a practical and effective manner, without imposing disproportionate administrative burdens on companies, particularly SMEs. The recent amendments represent an important step forward by limiting the obligation to submit due diligence statements to the first placer on the market.

At the same time, several burdensome requirements remain. The first downstream operator is still required to collect and store reference numbers, which is not in line with the once-only principle. Similarly, residual compliance obligations expose downstream operators to liability risks, while the lack of de minimis thresholds and a “zero-risk” category mean that companies sourcing from countries with negligible deforestation risk or handling very small quantities remain subject to disproportionate administrative requirements.

The simplification review therefore provides a timely opportunity to address these issues and deliver a more effective and workable EUDR. Building on the [Eurochambres 60+ simplification proposals](#), the chamber network urges the Commission to consider the following priorities of the European business community:

- **Delete the requirement for the first downstream operator to collect and store reference and identification numbers (Article 5(3) and (4)).** These obligations continue to create considerable administrative and financial burdens, particularly due to the need to adapt IT systems and internal processes. At the same time, they provide limited added value for traceability, as the relevant information is already submitted by the operator who first places the product on the market.
- **Remove the residual compliance obligations for downstream operators (Article 5(5) and (6)).** Downstream actors are currently required to react to substantiated concerns of non-compliance, despite having limited ability to influence deforestation risks upstream. In line with the once-only principle, compliance obligations should be exclusively limited to the operator who first places the product on the market.

- **Introduce practical de minimis thresholds to ensure proportionality.** Exempting small quantities from due diligence requirements (e.g., individual trees or small batches of commodities such as coffee beans) would reduce unnecessary administrative burden for low-volume operators.
- **Introduce a “zero-risk” category under Article 29.** While the EUDR establishes a benchmarking system, the current “low-risk” classification only partially reduces due diligence requirements. Companies sourcing from countries with negligible or non-existent deforestation risk must still submit due diligence statements and collect detailed supply-chain data. Introducing a “zero-risk” category, open to both EU and non-EU countries where scientific evidence demonstrates negligible deforestation risk, would ensure proportionality while preserving the regulation’s objectives.
- **Recognise credible third-party certification schemes as creating a presumption of compliance.** Many companies already rely on established certification schemes such as FSC and PEFC, which involve extensive audits and documentation. Recognising schemes based on robust standards would reduce administrative burdens, avoid duplication and leverage existing responsible sourcing infrastructure.
- **Reassess the requirement to verify legal production in the country of production (Article 3(b)).** In practice, collecting and verifying foreign legal information, often only available in local languages, represents a significant burden, particularly for SMEs. Simplification or clarification of this requirement should therefore be considered.
- **Clarify the application of the EUDR to exports.** Since reference numbers are only collected and stored by the first downstream stage, information flows may be interrupted further along the supply chain. This creates uncertainty regarding due diligence statements for exports beyond the first downstream stage and requires clarification.
- **Refrain from extending the scope of products covered by the regulation.** The chamber network does not support adding new products to the regulation until implementation experience has been gathered and the administrative impact of the existing framework has been properly assessed.
- **Strengthen accompanying measures in trade and development policy.** The EU should intensify dialogue with producer countries to support compliance with the EUDR and ensure secure and sustainable supply chains.

Eurochambres remains committed to the shared goal of aligning sustainability with competitiveness. Delivering a more balanced and proportionate EUDR is essential for achieving this objective. I remain available to discuss with you how we can mobilise the chamber network to contribute to this process.

Yours sincerely,



Vladimír Dlouhý  
Eurochambres President