

Joint Statement in Response to the EU Deforestation Regulation (EUDR) Amendments

Submitted on behalf of the U.S. Forest Products Value Chain

Introduction

We, the undersigned representatives of the U.S. forest products value chain, appreciate the opportunity to respond to the European Commission's call for comments regarding the recently amended **EU Deforestation Regulation (EUDR)**. We share the Commission's objective of preventing global deforestation and forest degradation and strongly support policies that promote sustainable forest management worldwide. Targeted simplifications for low-risk countries is necessary to strengthen the effectiveness, credibility, and proportionality of the EUDR—ensuring it focuses resources where deforestation risk is greatest, while preserving stable access to sustainably sourced forest products for EU operators and consumers.

The U.S. forest products sector operates within one of the most sustainable, circular forest fiber systems in the world and has been **recognized by the European Union as posing a negligible risk of global deforestation**. Despite this recognition, EUDR compliance requirements continue to impose **disproportionate, costly, and unbalanced administrative burdens** on non-EU suppliers, forest managers and product producers, particularly those in low-risk countries such as the United States, without delivering additional environmental benefits.

As the Commission reviews the law for opportunities to reduce the compliance burden, it is important to note that the December amendments do not help landowners and operators outside the EU. The Commission must address fundamental misalignments between EUDR requirements and the realities of low-risk forest product supply chains outside the EU.

Why Additional Changes Are Needed

The December 2025 amendments substantially eased compliance obligations that are only available to EU-based downstream and small/micro players, thus creating a very unequal playing field for low-risk countries outside the EU. The EUDR framework, even as amended, continues to apply **uniform and highly granular traceability and geolocation requirements** to supply chains that are already demonstrably low risk. For U.S. forest products, this results in compliance obligations that are **costly, operationally impractical, and disconnected from deforestation risk**.

In particular, the requirement for **plot-level geolocation data**—applied regardless of risk classification—creates an exponential increase in data volume for non-EU suppliers. U.S. producers estimate that a single shipment of forest products may include **thousands of individual plots of land**, and a single container can require **tens of thousands of geolocation**

data points, despite originating in a country with well-established forest governance and negligible deforestation risk.

These requirements do not enhance the EU's ability to prevent deforestation. Instead, they divert resources away from forest management, innovation, and trade, while creating **non-tariff trade barriers** that conflict with broader transatlantic trade commitments.

Negative Consequences of Inaction

If further simplification for low-risk countries is not adopted, the current EUDR framework will produce consequences that **undermine both economic and environmental objectives**, including:

- **Disproportionate impacts on small forest landowners and Native American Tribes**, who comprise nearly 11 million individuals supplying the majority of U.S. harvested timber and often lack the digital tools, GIS systems, or technical capacity required for plot-level compliance.
- **Severe challenges for small sawmills and wood residual suppliers**, whose byproducts are blended from multiple sources, making plot-level traceability practically impossible once identity is lost during processing.
- **Loss of small landowner, Tribal, and land manager access to EU-exposed markets**, incentivizing timber buyers to favor larger, technology-equipped landowners and suppliers, causing small players to withdraw from EU supply chains altogether.
- **Increased waste and carbon emissions**, as forest residuals and byproducts are stranded without markets and diverted to landfill or incineration instead of being used in long-lived products.
- **Reduced forest management and land use conversion**, outcomes that run directly counter to the objectives of the EUDR.

In fact, a recent EUDR Impact Survey of U.S. forest landowners, forest managers, and product manufacturers found:

- 63% of respondents indicate that they do not expect to be able to meet EUDR compliance requirements under current conditions
- 30% report market disruption, including cancelled, lost or declined contracts as a direct result of EUDR compliance requirements
- 43% of respondents, largely small landowners, are now considering conversion of their forest land to an alternative land use, in response to EUDR-related compliance or market pressures. A majority of respondents (60%) cited major concerns about sharing sensitive geospatial and proprietary information without necessary safeguards

In addition, EU operators who rely on imported low-risk fiber from the United States face **higher costs, supply uncertainty, and reduced sourcing options**, further distorting trade without advancing deforestation prevention.

Proposed Solutions That Preserve the Intent of the EUDR

We believe these challenges can be addressed through **targeted, risk-based adjustments** that preserve the EUDR’s core objective—preventing global deforestation—while eliminating unnecessary burdens for low-risk supply chains.

Amend or clarify the Definition of “Plot of Land” for Low-Risk Countries

We urge the Commission to amend **Article 2(27)** or provide updated guidance to allow **broader scale geolocation** for forest products originating in countries already classified as low risk as follows:

“Plot of land” means land, ~~within a single real-estate property, as recognized by the law of the country of production~~, which enjoys sufficiently homogeneous conditions to allow an evaluation of the aggregate level of risk of deforestation and forest degradation associated with relevant commodities produced on that land.

A revised definition would still enable meaningful risk assessment while:

- Maintaining full alignment with the EUDR’s environmental intent
 - Significantly reducing unnecessary administrative and compliance costs
 - Lowering data volume pressure on the TRACES system
 - Enabling proportional, risk-based traceability that reflects real deforestation risk
 - Allowing flexibility to support small and micro-operators while preserving regulatory oversight
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Conclusion

The U.S. forest products value chain remains committed to constructive engagement with the European Commission and to advancing shared goals of forest sustainability and global deforestation prevention. However, **continued application of high-cost, high-complexity requirements to low-risk supply chains deliver no measurable environmental benefit and risks undermining both trade and sustainability outcomes.**

We respectfully urge the Commission to build on recent amendments by adopting **additional, targeted simplifications for low-risk countries**. These changes would strengthen the effectiveness, credibility, and proportionality of the EUDR—ensuring it focuses resources where deforestation risk is greatest, while preserving stable access to sustainably sourced forest products for EU operators and consumers.

American Forest & Paper Association

American Forest Foundation

American Hardwood Export Council

American Wood Council

Appalachian Hardwood Manufacturers, Inc.

Association of Consulting Foresters

Forest Landowners Association

Forest Resources Association

Hardwood Federation

Hardwood Manufacturers Association

National Alliance of Forest Owners

National Hardwood Lumber Association

Southeastern Lumber Manufacturers Association

Southern Forest Products Association

Treated Wood Council

U.S. Industrial Pellet Association

Western Hardwood Association