



JESSIKA ROSWALL

MEMBER OF THE EUROPEAN COMMISSION

ENVIRONMENT, WATER RESILIENCE AND A COMPETITIVE CIRCULAR ECONOMY

Brussels, 23/09/2025

Dear Mr. DECARO,

The European Union Regulation on deforestation-free products (EUDR) is a key initiative to combat global deforestation and ensure sustainable value chains.

The implementation of the EUDR requires the availability of an information system (henceforth “the IT system”), to be developed, managed and maintained by the Commission. This IT system must be able to handle all the transactions for products covered by the EUDR and initiated by economic operators in the scope of the EUDR, both upstream and downstream, inside and outside the EU.

Over the last year, the Commission has been deploying the IT system in close contact with stakeholders. In this context, new projections on the number of expected operations and interactions between economic operators and the IT system has led to a substantial upward reassessment of the projected load on the IT system.

This is linked to a number of factors. Among these, one issue is related to the way economic operators can choose to interact with the IT system to facilitate their operations. Another is related to the obligations placed on downstream operators by the EUDR, despite efforts over the last months to provide simplification to stakeholders. Further factors relate to the high volume of small packages that are imported into the EU, or the impact on the length of replies to operators of various internal checks by the Commission or the Competent Authorities of the Member States related to submitted data.

Based on the available information, the Commission’s assessment is that this will very likely lead to the system slowing down to unacceptable levels or even to repeated and long-lasting disruptions, which would negatively impact companies and their possibilities to comply with the EUDR. Operators would be unable to register as economic operators, introduce their Due Diligence Statements, retrieve the necessary information from the IT system, or provide the necessary information for customs purposes where relevant. This would severely impact the

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achievement of the objectives of EUDR, but also potentially affect trade flows in the areas covered by the legislation.

The Commission is currently continuing to assess the situation and the measures that can be taken to ensure a full alignment between the IT interactions required from economic operators that derive from the EUDR, and the underlying IT system architecture and performance. Despite efforts to address the issues in time for the entry into application of the EUDR, it is not possible to have sufficient guarantees that the IT system will be able to sustain the level of the expected load.

In view of this, the Commission is considering a postponement of the entry into application of the EUDR, currently foreseen for 30 December 2025, for one year, in order to avoid uncertainty for authorities and operational difficulties for stakeholders in the EU and third countries, and to allow time to remedy the identified risks.

I would be happy to discuss with you at your earliest convenience how we can best go about this matter in good cooperation and dialogue between the three institutions.

I am sending an identical letter to Minister Magnus Johannes Heunicke, Chair of the Environment Council.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Jessika Roswall', with a stylized, cursive script.

Jessika ROSWALL