



European Federation of Wooden pallet
and Packaging Manufacturers

FEFPEB Newsletter EUDR and
call for action



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The EUDR roller coaster continues each day, this is to receive the latest update.

Please [click here](#) for the **open statement co-signed by 24 European organisations and coordinated by CEI Bois, calling on the European Commission to introduce a “stop-the-clock” mechanism that would allow policymakers to carry out a proper and comprehensive assessment of the EUDR, with the aim of identifying genuine simplification measures and making the Regulation's obligations truly workable.**

Call for action: We kindly ask the FEFPEB members to circulate this statement and share it with your national contacts, including press contacts. This is not the request of a single wood sector: it is the united call of an entire value chain.

The open statement has been shared with the specialised press and EU policymakers (European Commission, European Parliament, and Permanent Representations). We count on your support to give this initiative greater visibility by sharing it within your networks.

There is a wide range of joint statements by all kind of national and international stakeholders issued and the wood sector needs to be stand together.

There are in fact only **three alternatives** at this very moment, and this has been forwarded by our German member association HPE:

- Postponement of the effective date of the EUDR by one year for all parties concerned
- Review of the abolition of the EUDR (There is no shame in admitting mistakes and reacting when something does not work. The important thing is to learn from it. We would very much like to see more of this basic entrepreneurial principle from legislators)
- Submission of a new proposal for the EUDR by the Commission in the first quarter of 2026, which may well include its abolition. Many practical suggestions for improvement are already on the table.

The decision on the emergency brake cannot be delayed: after an initial announcement of a postponement of the date of entry into force, the value chain is now approaching the deadline and every additional day of uncertainty is poison for the European economy, which currently needs all its strength to remain competitive. We therefore urgently need your help in this matter at short notice!

Then [click here](#) for **the position paper of Latvia**, supported by Bulgaria, Czechia, Estonia, and Poland.

As you will see, this position is very much in line with our open statement, as these countries are calling to:

- Postpone the date of entry into application of the EU Deforestation Regulation by at least one year;
- Review and simplify the Regulation's requirements, including the introduction of a "no-risk" category;
- Re-evaluate the impact assessment, comparing the costs of implementation with the expected practical results.
- If the administrative and financial burden on Member States is found to be disproportionate to the intended objective, the abolition of the EU Deforestation Regulation may be reconsidered.

Please feel free to **share this document with your national representatives and encourage them to support Latvia's position.**

On 27 October 2025, the AGRI Ministers discussed the Deforestation Regulation during their meeting in Luxembourg.

While Member States broadly welcomed the Commission's effort to simplify the text, a majority of them, including the **Czech Republic, Poland, Estonia, Bulgaria, Austria, Luxembourg, Greece, Slovenia, Slovakia, and Croatia, called on the Commission to return to its initial proposal for a one-year postponement** in the application of the legislation for all companies.

Latvia and the Czech Republic also voiced support for a re-assessment of implementation costs, with a view to considering a more substantial revision of the Regulation, or even its repeal.

France, Germany, and Finland, for their part, underlined the challenge of adopting the proposal by the end of the year.

Fisheries Commissioner Kostas Kadis, speaking on behalf of the Environment Commissioner, stressed: *"Time is crucial; if we do not reach an agreement by 13 December 2025, the Regulation will enter into force without the proposed simplifications."*

The Commission's tactic appears clear to **put pressure on Member States to accept the proposal as tabled.**

Moreover, **a COREPER meeting is expected to take place tomorrow**, where two questions will be put to Member States' representatives:

1. Can delegations accept the Commission's proposal without amendments, to ensure that the Information System becomes fully operational?
2. If not, what do delegations consider to be the best way forward to achieve a timely adoption of the Regulation and ensure smooth implementation?

NEXT STEPS – Two levels of your possible engagement:

1. **Dissemination:** Share the open statement as widely as possible, including on your social media channels.
2. **Political engagement:** When engaging in discussions with **Member States** or **Members of the European Parliament**, please underline that **policy-makers should support the introduction of a “stop-the-clock” mechanism** to ensure a workable and proportionate implementation of the EUDR.

If you are requested to provide answers to the Council's questions, please find below a suggested approach:

Q1. Can delegations accept the Commission's proposal without amendments, to ensure that the Information System becomes fully operational?

→ **Answer: Not advisable – NO.**

Accepting the proposal *as it stands* may expose operators to non-compliance risks, as the changes introduced by the Commission are substantial and require adequate time for stakeholders, policy-makers, and Member States to analyse and discuss them. This is particularly difficult given the current **deadline of 30 December 2025**.
(*This reasoning is also reflected in our open statement.*)

Q2. If not, what do delegations consider to be the best way forward to achieve a timely adoption and ensure smooth implementation?

→ **Answer: Introduce the “stop-the-clock” mechanism**
Recommended legal pathway:

- **Reject** the following Articles: *Article 1, Chapter 2, Articles 4, 4a, 5, 6, 18, 19, 24, and 34.*
- **Amend** Article 37 (*"Repeal and transitional provisions"*) and Article 38 (*"Entry into force and date of application"*) with the following request: **adopting an Implementing Regulation temporarily derogating from the application of this Regulation (EUDR) for a period not exceeding twelve months. That period may be renewed once, for an equivalent duration, where the circumstances that justified the initial derogation persist and the renewal is duly justified.** (*To be noted: this text does not suggest how the two Articles should be formally amended, but rather illustrates the legal mechanism the Council should seek to obtain through the ongoing legislative process.*)

This provision is consistent with:

- Article 5 TEU – Principle of proportionality
- Article 17 TEU – Commission's role in ensuring proper implementation of Union law
- Article 291 TFEU – Implementing powers of the Commission
- General principles of EU law – Legal certainty and legitimate expectations

As you can imagine, *"stop-the-clock"* is an informal expression; legally, it should be referred to as a temporary derogation. Such a derogation is valid only if its duration is clearly defined, and this point has not yet been discussed in detail among us.

It has been verified whether there were relevant precedents, and indeed there was one related to the EU Emissions Trading System (ETS). While I have not yet had time to analyse it fully, it appears that establishing a 12-month derogation, with the possibility of one additional renewal, would be legally sound and consistent with EU institutional practice.

Best regards,

Fons Ceelaert
Secretary general

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