

Coalition Statement

Need for an EUDR Information System without flaws and technical constraints, aligned with business practice

Only a few months before the application of the EU Deforestation Regulation on 30 December 2026, the undersigned associations, committed to fighting deforestation and supporting a workable implementation of the EUDR requirements, reiterate their call for addressing the remaining flaws, gaps and artificial constraints affecting the functioning of the Information System.

The EUDR Information System represents the backbone of the traceability feature of the EU regulation, aimed to prevent products linked to deforestation from entering the EU market. Ensuring that the Information System meets operators' and traders' requirements and runs smoothly and dependably is a critical requirement for seamless trade flows and critical supplies for the EU market.

At a time when Commission services are revising the Information System to integrate the amendments introduced to the EUDR and to implement targeted technical improvements aimed at enhancing performance, resilience and user-friendliness, we would like to reiterate our urgent call to fix unnecessary technical constraints and highly problematic shortcomings of the system.

1. The treatment of **Due Diligence Statement (DDS) aggregation**, which was possible until the December simplification, is one of these major gaps. While the Commission's Report indicates that the system will allow grouping of DDS reference numbers, in practice, significant technical constraints are imposed which severely limit or even prevent meaningful aggregation.
2. The use of an existing data base developed for other purposes (TRACES), and not adapted to the needs of the different supply chain players, is not **providing necessary functionalities** (i.e. the uploading of geolocation files corresponding to a large number of suppliers; stable Application Programming Interface (API) software connection; the timelines and waiting times conducive to business practices, such as making reference number rapidly available; and accommodating also less e-literate small primary operators and micro-enterprises).
3. With regard to the **simplified declaration**, the version presented by the Commission to relevant stakeholders is not usable for micro and small operators. Primary producers currently lack reassurance that the promised proportionality and simplification measures will be effectively implemented. In addition, there is no certainty that the databases established at the EU or Member State level will be accessible and integrated into the EUDR IT system.
4. For countries and activities with a **high proportion of SMEs and particularly micro-enterprises, with scarce IT resources**, no

dedicated compliance teams, nor in-house capacity to manage digital traceability systems, and relying on manual workflows, the current design of the Information System might constitute a structural barrier to market access.

5. **Advanced notification of any modification affecting the Information System** is also necessary to ensure legal certainty, operational continuity and adequate preparedness of both competent authorities and economic operators. Such information is essential for all concerned actors to adapt internal procedures and technical systems in a timely and compliant manner.

If the flaws and constraints are not lifted, operators and traders will be thwarted in their efforts to comply with the Regulation. They will incur unnecessary costs to adapt operations and logistics, for additional data manipulation; they risk penalties due to human processing errors and ultimately can be discouraged from producing, processing and trading the commodity and from serving the EU market.

The lack of solutions for temporary disruptions, delays or outages is a further source of concern. In the event of technical disruptions or system unavailability, the Commission should establish and make available clear procedural guidance specifying the concrete steps and obligations applicable to operators and traders using the Information System.

Considering the above, the undersigned associations call on the European Commission to urgently ensure that with the current review, the EUDR Information System, beyond matching legal provisions, is also operationally workable aligned with business practices and undergoes stress-testing exercise. These improvements are essential to ensure that the Information System supports, rather than hinders, compliance with the Regulation and the continued supply of relevant commodities and products to the EU market. We remain available to cooperate and support all efforts aimed at ensuring that the Information System matches the needs of operators and traders.

Signatories

APAG – Oleochemicals Europe

Bioenergy Europe – The voice of European bioenergy

CEI-bois – The European Confederation of Woodworking Industries

CEPI – Confederation of European Paper Industries

COPA-COGECA – European Farmers and European Agri-Cooperatives

CESIO – Surfactants Europe

COCERAL – The European Association of Trade in Cereals, Oilseeds, Rice, Pulses, Olive Oil, Oils and Fats, Animal Feed and Agrosupply

ECA – European Cocoa Association

ECMA – European Carton Makers Association

EOS – European Organisation of the Sawmill Industry

EPF – European Panel Federation

FEDIOL – The Vegetable oil and Protein Meal industry

FEFAC – The European Feed Manufacturers' Federation

FEFCO – The European Federation of Corrugated Board Manufacturers

FEP – European Parquet Federation

Tyres Europe – European Tyre Manufacturers' Association

UECBV – The European Livestock and Meat Trades Union

