

29 February 2024

Dear President von der Leyen,

CC:

Commissioner Sinkevičius

Commissioner Šefčovič

Commissioner Dombrovskis

President Michel

Subject: Urgent meeting request to discuss the implementation of the Regulation on deforestation-free products (Regulation (EU) 2023/1115) (EUDR)

We, the undersigned, representing forest product industries and landowners from the United States of America and Canada and US state forestry agencies, are writing to request an urgent meeting to discuss the implementation of the European Union Deforestation Regulation (EUDR).

We welcome the European Union's (EU) efforts to stop commodity-driven deforestation and forest degradation and are confident that forestry practices throughout the US and Canada are already delivering on the objectives of the EUDR. The US and Canada have strong foundations in sustainable forest management, have demonstrated staunch support for international efforts to address deforestation, and have been long-trusted EU trade partners. The US and Canada's long-term commitment to sustainable forest management should be recognized by the European Commission and the Member States' competent authorities in the interpretation and implementation of the Regulation.

That said, we are concerned that some of the obligations in the EUDR will put our forest products industries at a competitive disadvantage by imposing unnecessarily burdensome and costly requirements on US and Canadian exporters that will unjustifiably limit market access for US and Canadian forest products entering the EU without corresponding environmental benefits.

We are concerned about how forest degradation is ultimately defined in the implementation of the law, which could conflict with many of the critical efforts underway in the US and Canada to strengthen forest health, reduce wildfire risk, and mitigate the impacts of climate change on our forests. We are equally concerned about the interpretation of the provisions on geolocation data and corresponding impacts on the trade in wood products sourced from non-industrial private forest owners and on the use of wood chips, forest residuals, and sawmill residues.

An overly strict interpretation would be impractical at best and, in many cases, impossible for North American and Canadian suppliers to meet – not because of deforestation or forest degradation in our countries, but because of the mature, complex supply chains in North America and the fiber blending that is an inherent part of our industries' processes.

We have several other concerns about the current approach, such as the privacy of confidential data and business information, the lack of consultation with trade partners while the law was being drafted, and the short implementation period. In totality, the current approach taken by the EU Commission will disincentivize the use of sustainably produced forest products and potentially raise World Trade Organization concerns by imposing impractical, unnecessary, and costly measures in pursuit of this Regulation's otherwise legitimate objectives.

We share the EU Commission's goal to eliminate deforestation and forest degradation and are eager to work with you on a more practical approach to implementation. In this regard, we request the opportunity to meet with you in person or virtually to discuss this critical and urgent subject.

Yours sincerely,

- Alabama Forestry Association
- Arkansas Forestry Association

- American Hardwood Export Council (AHEC)
- Forest Resources Association (FRA)
- Forestry Association of South Carolina
- Georgia Forestry Association
- Hardwood Federation
- Mississippi Forestry Association
- National Alliance of Forest Owners (NAFO)
- National Association of State Foresters (NASF)
- North Carolina Forestry Association
- Pellet Fuels Institute (PFI)
- US Industrial Pellet Association (USIPA)
- Wood Pellet Association of Canada (WPAC)