Companies in food, cocoa, coffee, palm oil, rubber and timber sectors call for no delay in EUDR

17 November 2025

- Implementation of the EUDR on schedule; no ‘stop the clock’, simplification review clause or one-year delay.
- A well-defined grace period to allow time for the Commission’s IT system and company systems to bed in.
- Preservation of the principles of due diligence throughout the supply chain, without requiring storage and transmission of excessive volumes of information.

The coalition of companies, non-governmental and multi-stakeholder organisations in the food, cocoa, coffee, palm oil, rubber and timber sectors, at every stage of global supply chains, from foresters to processors, manufacturers and retailers, are reinforcing their calls for no further delay in implementation of the EU Deforestation Regulation.

This follows the coalition's event in the European Parliament on 5 November 2025 ('Time to Deliver: Business Needs Effective EUDR Implementation Now') and letter to Commissioner Roswall on 2 October 2025.

Stop-the-clock or simplification review clause: prolonged uncertainty without practical solutions to key issues

Any proposal for a 'stop-the-clock' mechanism or a simplification review clause, leading to a suspension of the EUDR without clarity on its final provisions, would be extending current legal and market uncertainty for the long run. This approach would inflict substantial sunk costs on companies which have made the necessary investments and on-the-ground engagement in preparation for the EUDR, and reward the laggards. It would fatally compromise the EU's reputation as a reliable partner of producing countries in halting deforestation.

One-year delay: uncertainty of 2024 and 2025 repeated in 2026

A one-year delay offers no greater certainty of successful implementation. The relevant actors – including companies, smallholder farmers, national competent authorities and producing countries – need to begin implementing the due diligence obligations immediately, generating the practical experience that will be essential for sectors and markets to be able to adjust to the EUDR's effects and impacts.

Further postponement risks stakeholder disengagement, creates greater market uncertainty and instability, and offers no guarantee of fully functional IT systems after the new deadline.

Grace period: pragmatic way forward to address remaining issues

The best way forward is a well-defined 'grace period' of at least six months (potentially extendable to twelve). This would mean the EUDR entering into application, and companies starting to file the information needed to generate due diligence statements, on schedule by the end of 2025. For relevant products placed on the EU market during the grace period, competent authorities would not enforce penalties against companies in cases of non-compliance. This would allow the time necessary for the Commission to resolve the problems with its IT system and provide a learning period for both companies and competent authorities, while still incentivising compliance efforts and related investments.

Traceability requirements throughout the supply chain are fundamental

Traceability constitutes a foundational element of the EUDR framework and must be rigorously upheld throughout the supply chain.

We understand the arguments for simplification of the due diligence system, but the Commission's proposal to require companies to collect and pass on information through the supply chain does not achieve this. It would mean downstream operators and traders collecting and passing on the details of potentially thousands of due diligence statements for each shipment without the possibility of bundling the information.

We call instead for a streamlined system:

1. Due diligence statements would be submitted only by operators, i.e. those companies first placing relevant products on the EU market.
2. All companies, including downstream operators and traders, would be required to establish a due diligence system, which would be open to checks by competent authorities, and they would be required to react to any evidence of non-compliance, or substantiated concerns, about products in their supply chains.
3. All companies would be required to keep records of the companies they buy from and sell to – the same system as in the EU General Food Law, which works well and with which many companies are familiar.

This system would preserve the principles of due diligence and traceability that are essential to meet the aims of the EUDR while reducing the number of due diligence statements needing to be filed and avoiding placing excessive burdens on companies.

The coalition also emphasises that the Commission's proposed changes for micro and small operators that place products directly on the EU market will not benefit the vast majority of smallholder farmers overseas (for example for coffee, cocoa, palm oil, rubber and timber), who do not export directly to the EU. Smallholder farmers in producing countries will still need support, from the EU, member states and companies.

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