

## **EUDR Simplification Review: the case for further legislative action remains CEPF Statement**

The Confederation of European Forest Owners (CEPF) takes note of the publication, on 4 May 2026, of the European Commission's package for the simplification review of the EU Deforestation Regulation ('EUDR package'), four days after the statutory deadline of 30 April. A thorough analysis of the full package is currently underway, and CEPF will share a comprehensive position in due course. However, first analysis of the package is already pointing to significant shortcomings.

Overall, the EUDR package falls short of the expectations set out in the joint statement of 17 April 2026<sup>1</sup>. Despite the concrete and constructive proposals put forward on that occasion, the Commission does not appear to have taken them sufficiently into account. For forest owners across the EU, and in particular for micro and small primary operators, the review fails to deliver the meaningful simplifications needed for practical implementation. Further, a significant share of the measures presented appear to stem directly from changes already legislated in the December 2025 amendment, rather than from genuinely new steps delivered by this review. The Commission's headline figures on administrative burden reduction should therefore be read with caution.

Two issues are of particular concern at this stage, the question of geolocation and the role of forest owners' associations.

First, on the question of geolocation, the updated 5<sup>th</sup> FAQs states that a postal address is only acceptable as an alternative to geolocation or cadastral information data where it clearly corresponds to the actual geographic location of the relevant plots of land. Business seat of micro or small operator, where it is only used for administrative purposes, but not for the purpose of producing relevant commodities and products, cannot be declared as a plot of land or establishment for EUDR compliance purposes. In practice, for the vast majority of forest owners, the place of production and the business address do not coincide. Plot-specific identification therefore remains necessary, and the resulting administrative burden stays, a particular burden for small-scale forest owners.

Second, on the role of forest owner associations, no substantive change has been introduced. Independent reporting by an association on behalf of its members remains limited to cases where the association itself places timber on the market. In the most common practical arrangements, including brokerage and self-marketing by the owner, the reporting obligation falls on the individual forest owner. The association may only act as an authorised representative. This reflects no advance on the amended legal text of December 2025 and is not suited to the specificities of small-scale forest owners.

While updated guidance and FAQs documents are a useful complement, they cannot substitute for changes to the legal text itself. CEPF therefore calls on the Commission to bring forward a proposal to amend the legally binding text in order to address these structural shortcomings before the entry into application of the EUDR at the end of 2026.

---

<sup>1</sup> [Joint Statement | Further steps are needed to make EUDR simplification a workable reality for farmers, forest owners, and their cooperatives](#), published on 17 April 2026

