

## Position on the implementation of the EU Deforestation Regulation

The Coalition on Sustainable Timber was established with the primary goal of advocating for a sound and proportionate implementation of the European Union's regulation on deforestation-free products (EUDR) while actively supporting compliance efforts.

In this position paper, the Coalition aims to highlight concerns regarding the implementation phase of the EUDR and emphasizes the need for close cooperation with timber producing countries to move towards the common objective of promoting sustainable forest management.

Members of the Coalition highlight several factors that need to be considered:

### **Deadline Challenges**

The coalition is deeply concerned about the tight deadline for implementing the EUDR and its implementing acts by 30 December 2024. Given that guidelines and implementing acts are yet to be prepared, it is essential to acknowledge the practical difficulties many economic operators in timber producing countries may encounter in meeting the specified deadline.

### **Clear Definitions**

To prevent legal uncertainty and arbitrariness, the coalition calls for clearer definitions of key terms such as forest, forest plantation, planted forest, deforestation, and forest degradation. These terms differ from country to country and would need further discussion to ensure alignment and effective implementation.

### **Acknowledgment of Sustainable Forest Management Practices**

The Regulation should duly consider and acknowledge the sustainable forest management practices already in place in timber producing countries. The EUDR should avoid a one-size-fits-all approach that disregards local circumstances, capabilities, and ongoing efforts to combat illegal deforestation.

### **Geographic Information Obligation**

The geographic information obligation, including precise geolocation, represents a huge technical challenge for producers, given the varying sizes of 'plots of land', the enormous number of different tree species and the complexity of supply chains. It is crucial to consider practical feasibility and explore alternative approaches to mitigate those challenges. Members are also concerned about the administrative burden associated with the

geolocation and traceability requirements, certifications, and customs procedures outlined in the EUDR.

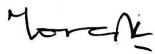
### Support for Smallholders

Recognizing the potential impact on smallholders, the coalition advocates for special support measures to assist this vulnerable group during the implementation of the EUDR.

### Conclusion

The Sustainable Timber Coalition emphasizes the importance of a balanced and collaborative approach in the implementation of the EUDR. The coalition calls on EU institutions to foster an open and constructive dialogue with producing countries. The coalition would be happy to that end, to join the Multi-Stakeholder Platform on Deforestation.

On behalf of the Coalition of Sustainable Timber.



Yong Teng Koon  
Chairman

### Members of our coalition:



Bolivia's Forestry  
Chamber

**BOLIVIA**



Brazilian Association of  
the Mechanically Processed  
Wood Industry

**BRAZIL**



Ecuadorian Association  
of the Forestry and  
Timber Industry

**ECUADOR**



Kumasi Wood Cluster  
Association

**GHANA**



Forest Industries  
Association of Ghana

**GHANA**



Indonesian Wood Panel  
Association

**INDONESIA**



Paraguayan Federation  
of Woodworkers

**PARAGUAY**



Exporters Association

**PERU**



Malaysian Timber Association

**MALAYSIA**



Forestry Association of Nigeria

**NIGERIA**