



Director General

Mr Virginijus Sinkevičius
European Commissioner for
Environment, Oceans and Fisheries

24 May 2024

Implementation of the Deforestation-free Supply Chains Regulation

Dear Commissioner Sinkevičius,

The Deforestation-free Supply Chains Regulation is set to enter into force in seven months. The regulation mandates that products in scope can only be sold on the European market if they are deforestation-free, legally produced and traceable back to the production plot.

Industry is actively preparing for this. But we are hitting a roadblock as national authorities are currently not ready to implement this regulation.

This is a key problem for industries that rely on forward buying and for the associated growers in their planning. Our problem is that there is ambiguity regarding the documentation required to prove compliance with the legislations of producing countries, as stipulated in Article 9. This extends to wide requirements for geolocation data, compliance proof and segregated commodity flows, which impose a significant economic burden on both external producers and smallholders in origin countries.

The lack of guidance from the European Commission threatens to create significant disruptions in these international supply chains.

We therefore urgently ask you to provide comprehensive implementation guidelines.

In addition, we kindly request a review of Annex I to move towards a level playing field, reducing internal market disruption and avoiding impediments to the free movement of goods within the EU market.

Our aim is to avoid global consequences, such as increased transport and logistics costs, higher consumer prices, supply shortages and the exclusion of smallholders and trade partners from the supply chain.

To avoid market disruptions we also ask you to consider transitional measures that will ensure full readiness before the regulation's entry into application.

Yours sincerely,

Marco Mensink

