

Transcript of the Round Table Discussion:

"Time to Deliver: Business Needs Effective EUDR Implementation now"

5 November 2025 – European Parliament

1. Background

The event took place shortly after the European Commission published its proposal to amend the EU Regulation on deforestation-free products (EUDR) on 21 October 2025.

Key speakers:

- **[PC]**: Pascal Canfin, Member of the European Parliament.
- **[FT]**: Francesco Tramontin, Vice President Global Public Affairs, FERRERO.
- **[VdW]**: Victoire de Wever, Partnership & Engagement Manager, OLAM AGRI.
- **[MP]**: Markus Pfannkuch, Co-CEO, PRECIOUS WOODS.
- **[Carl]**: Carl, Member of Pascal Canfin's team.
- **[ECA Rep]**: Representative of the European Cocoa Association (ECA).

2. Introduction and Framework for the Debate – Pascal Canfin [PC]

[PC]: "[I am] very sorry for the technical problems we are having live. Apparently, you can hear me in the room, but we cannot hear those of you participating remotely."

[PC] apologised for the delay, explaining that an agreement had been reached early this morning at 9 a.m. in the Council regarding the target for the 2040 Climate Law, a very important issue that required an emergency meeting in Parliament.

[PC] indicated that Europe was facing a new reopening of the *EUDR (European Union Defence Review)* as they spoke.

- **Conditional Support**: The Commission's proposal seemed "reasonable". Although his political group did not wish to reopen the file, they were "agreeable to supporting this proposal".
- **Risk of Postponement**: [PC] expressed concern that an additional one-year postponement could be added, which would be "very detrimental".
- **Need for "Test and Learn"**: [PC] suggested a grace period (six months or slightly longer) that had to be "legally speaking, absolutely certain" to be a grace period, focused on "*test and learn*". The aim is to start the process in earnest, transfer the data, and see how the IT system and the DDS work, but without incurring liability if there are any errors.

[PC] raised the issue of the "zero risk" category: "One of the most prominent potential elements, and I say potential because at the moment it is not on the table in the Commission's proposal, but it could come from Parliament and the Council, is this zero risk category." He added that this would be very detrimental.

[PC] concluded his introductory remarks by highlighting the extraterritorial role of the EUDR. Although the EU only regulates access to the EU market, it *de facto* regulates non-European companies. The EUDR is specifically and explicitly listed in the EU-US trade agreement of August, where the Trump administration requests that it not be applied to US companies. [PC] considered that such an exemption "would not make sense from a political, geopolitical, legal or operational point of view".

3. Commitments and Testimonials from Industry Players

Francesco Tramontin [FT], FERRERO

[FT] spoke on behalf of Ferrero and its peers from other sectors, united by their commitment to implementing the EU DR.

- **Doing Good Business:** Commitment is not just a matter of reputation, but of "doing good business". This business is based on two foundations: traceability and due diligence in the value chain.
- **Essential Traceability:** As food companies, end-to-end traceability is already implemented for food safety and quality. [FT] stated, "Traceability is non-negotiable in our industry."
- **Grace Period:** The group actively supported the idea of a grace period for "*fine-tuning*" implementation elements, as "Test and Learn" is the only way forward, especially after the delays already experienced.
- **Opposition to Delays:** A delay, coupled with simplifications, would undermine the investments made by many companies over the past two years. [FT] was very direct: "It's *rewarding the laggards*."

Victoire De Wever [VdW], OLAM AGRI

[VdW] represented Olam Agri, an agri-food company operating in more than 30 countries and headquartered in Singapore. She affirmed Olam Agri's full commitment and support for entry into force "**by the end of this year**".

She gave specific examples of preparations:

- **Timber sector (Republic of Congo):** Management of a 2 million hectare FSC-certified concession. They are able to provide a detailed inventory of each tree selected and harvested, traceable back to the stump. They have set up a "wood portal" to provide customers with all the sustainability data necessary for due diligence.
- **Rubber sector (Côte d'Ivoire and Indonesia):** Significant investments have been made in traceability. More than 60,000 farmers have been mapped by polygon, covering more than 220,000 hectares. Their IT system enables end-to-end traceability: each pallet of rubber is barcoded and linked to GPS coordinates/polygons.
- **Consequences of a delay:** [VdW] acknowledged the possibility of a grace period for actors who are not ready, but stressed that additional delays would penalise companies that have invested in ground and IT systems. *It* estimated a "potential loss of up to 50% of [their] investments" for rubber if the EUDR were delayed, and that this would allow continued "*unfair competition*" with unsustainable timber products.

Markus Pfannkuch [MP], PRECIOUS WOODS

[MP] represented Precious Woods, which manages tropical forests in Gabon and Brazil.

- **Creating a Level Playing Field:** The tropical timber industry had already been subject to the EU Timber Regulation (EUTR) for over 10 years. They were "very happy to see the EUDR coming" as it includes other commodities and creates a level playing field. [MP] noted that in the absence of the EUDR, the EUTR did not always have an effect on enforcement, as some customers had requested the necessary documents too late.
- **The problem of geolocation data:** Preparation was relatively easy.. He lamented that the current system focuses "too much on geolocation data," which is "not sufficient to perform true due diligence."
- **Uncertainty:** A grace period would make sense if it applied to everyone. But the biggest concern is uncertainty. [MP] said, "We are eight weeks away from the end of the year and we don't really know what to prepare for."
- **[MP]'s appeal:** In conclusion, [MP] emphasised that, as with the implementation of the EUTR, there will inevitably be problems at the start of the EUDR. Therefore, it would be "very important" to have a decision now "so that we know what we have to do".

4. Question and Answer (Q&A) Session

[Carl] (PC Team): Carl asked what was needed to make the grace period a "learning curve" rather than just a waiting period.

[FT] (FERRERO response): [FT] replied that two things were necessary:

1. Companies (the "community of practice") will continue to apply the EUTR to the best of their ability.
2. They expect to work with the authorities, beyond FAQs and guidelines, via the standing committee with the Commission's supervisory authorities. This work is necessary to "examine the evidence" proposed and identify improvements.
3. It is crucial to "correct" the problem of the entire *downstream part* that "*manages so much data*".

[ECA Rep] (Statement by the European Cocoa Association): The ECA representative stated that, along with a few other associations, they were not asking for a delay. However, he identified "*serious flaws*" in the Commission's proposal, particularly regarding the grace period :

- **Retroactive checks:** The grace period allows for "retroactive checks" (a check in July for products imported in January), which undermines legal certainty. The ECA requests that the relevant article "not apply to products placed on the market before 30 June".
- **Removal of Downstream DDS:** The ECA calls for the removal of the *downstream DDS submission* requirement. [FT] supported this point, as food safety systems "already ensure traceability within the EU".

5. Conclusion of the Event (PC Team)

[Carl]: [Carl] concluded the discussion, regretting that online participants were unable to hear the exchange due to IT issues, an ironic situation given the subject matter.

[Carl] reiterated two key points:

1. The need to share responsibility along the value chain. Maintaining trust and transparency is the "integrity of the EUDR" and what makes it strong.
2. The vital importance of the EUDR: "The EUDR is even more visualised as the survival of this." If implemented, it could be the "only tool left" to prevent the EU from importing products from deforestation in the Amazon.

[Carl] thanked the participants, noting that it was now "up to the Council and Parliament to take up the work and ensure that we have a workable EUTR coming into force as soon as possible".