

**Ms. Florika Fink-Hooijer,  
Director General for Environment  
European Commission**

Brussels, 12 March 2024

**Subject: EUDR information system needs major improvements for effective implementation of the Regulation**

Dear Ms Fink-Hooijer,

We, the undersigned organisations, are active in preparing for the implementation of the EU Deforestation Regulation (EUDR) with our member companies and across our respective supply chains.

As part of our commitment to support a successful implementation of this regulation, considering the significant adjustments that are needed from suppliers, operators and traders, our companies have participated in the pilot testing of the initial version of the EUDR information system.

During the last multistakeholder meeting held on 22 February, your services acknowledged numerous comments received following the pilot testing. However, the outlined timeline for integrating the changes, developing the API link, preparing training and allowing the opening of the system to operators and traders in mid-December is not meeting business requirements.

We, the undersigned organisations, call for:

- urgent and fundamental modifications, as outlined at the 22 February meeting and suggested below;
- supply chain experts from targeted industries to be involved in the improvement of the information system;
- a second round of testing once industry feedback has been properly integrated, ideally still in Q2;
- a dedicated stress test allowing companies to upload large amounts of geolocalisation data; and
- an opening of the information system to operators and traders much earlier than foreseen, at least in November 2024, to allow all companies to get accustomed to the IS platform, ensure connection with their own data management system and ensure appropriate training of relevant staff.

We would also like to re-emphasize our main concerns expressed during the latest multistakeholder platform meeting regarding its current degree of accuracy:

- **Mass handling of data needs to be facilitated**

Given the large volumes of commodities and products that are handled in our industries' daily operations, which translate into large amounts of data to be input into the system, we require the wide use of automation to reduce the processing time of a DDS. Reducing the number of manual steps, which prove both costly and risky, should also be achieved by ensuring compatibility of the API/EDI with the information system.

- **More compatible formats for geolocation data**

Other formats than GeoJson had been indicated in the process leading up to the pilot testing but not yet taken up. We need the possibility to upload geolocation coordinates in different industry standard formats, in multiple files, and of varying sizes.

- **Making the system user-friendly**

The information system needs to be designed in a way that supports rapid and accurate entry of the required information in a DDS and allows searching effectively past DDSs for company management purposes.

- **Functionality for transition stocks**

It is essential to add a functionality for the creation of Due Diligence Statements of type "transition" for commodities and products placed on the market during the transition period. Operators should be allowed to provide supporting evidence in the form of e.g. bills of lading or customs declarations. This would give more clarity during the initial phase of the EUDR implementation.

Summing up the assessment made by our organisations, the first version of the EUDR Information System failed to meet expected functionalities and is no way near what is needed to manage due diligence statements effectively and accurately. The re-use of an existing platform (Traces) to develop the EUDR Information System missed delivering a credible platform and we are unconvinced that the sum of identified deficiencies can be addressed without understanding how our supply chains function.

We restate our commitment to the successful implementation of the EUDR, and we remain available to discuss these points in further detail.

Yours faithfully,

The undersigned associations:

Bioenergy Europe – the voice of European Bioenergy

CAOBISCO – Chocolate, Biscuit and Confectionery of Europe

CEPI – Confederation of European Paper Industries

COCERAL – European association of trade in cereals, oilseeds, rice, pulses, olive oil, oils and fats, animal feed and agrosupply

COTANCE – European Leather Industry

ECA – European Cocoa Association

ECF – European Coffee Federation  
 ETRMA – European Tyre & Rubber Manufacturers Association  
 Eurocommerce – the voice of Retail and Wholesale in Europe  
 EUSTAFOR – European State Forest Association  
 FEDIOL – EU Vegetable Oil and Proteinmeal Industry  
 FEFAC – European Feed Manufacturers' Federation  
 FoodDrinkEurope – European Food and Drink Industry



This letter has also been sent to:

Sabine Weyand, Director-General, Directorate-General for Trade  
 Wolfgang Bartscher, Director-General, Directorate-General for Agriculture and Rural Development