



**American
Forest & Paper
Association**

BETTER PRACTICES
BETTER PLANET **2030**
SUSTAINABLE PRODUCTS FOR A SUSTAINABLE FUTURE

European Union Deforestation Regulation

What it means for forest owners and forest managers

Florida Forestry Association Annual Meeting
August 27, 2025

Mark Pitts, American Forest & Paper Association

U.S. Forest Products Industry Economic Impact



\$435 Billion
products manufactured annually



Employs more than

925,000 people

and supports an estimated

1.63 million additional jobs

across our industry's value chain and in local communities



AF&PA serves to advance public policies that foster economic growth, job creation and global competitiveness for a vital sector that makes the essential paper and packaging products Americans use every day.

We are the voice of U.S. pulp, paper, and paper-based packaging manufacturers

Poll question

True or False?

As long as I am not importing
a product into the EU, the
EUDR regulation does not
affect me

Poll question

True or False?

Forest loss due to wildfire
or urbanization does not
count toward the EUDR
definition of
deforestation

Poll question

True or False?

SFI and FSC
certification provides
sufficient proof of
negligible
deforestation risk

EUDR Overview



The EU Deforestation Regulation aims to minimize the EU's contribution to deforestation, thereby reducing the EU's contribution to greenhouse gas emissions and global biodiversity loss.



EUDR directly addresses the issue of deforestation by requiring companies to demonstrate that their products are deforestation-free.



Product scope includes commodities (cattle, wood, cocoa, soy, palm oil, coffee, rubber), and some of their derived products, such as leather, chocolate, tires, or furniture.



The EUDR also supersedes the [EU Timber Regulation](#) (EUTR), broadening the scope to include more commodities beyond timber.

Importer

1. Conduct due diligence

Collect Necessary information;

- Geographical coordinates of all plots of land associated with the product
- Demonstrate there was no deforestation/forest degradation after Dec. 31. 2020
- Assess risk of deforestation/ forest degradation
- Mitigate risk if applicable

2. Compliance with applicable legislation

3. Submit DDS statement into TRACES System

EUDR Compliance Obligations



EUDR- How did we get here?

EUDR is rooted in European environmental responsibility

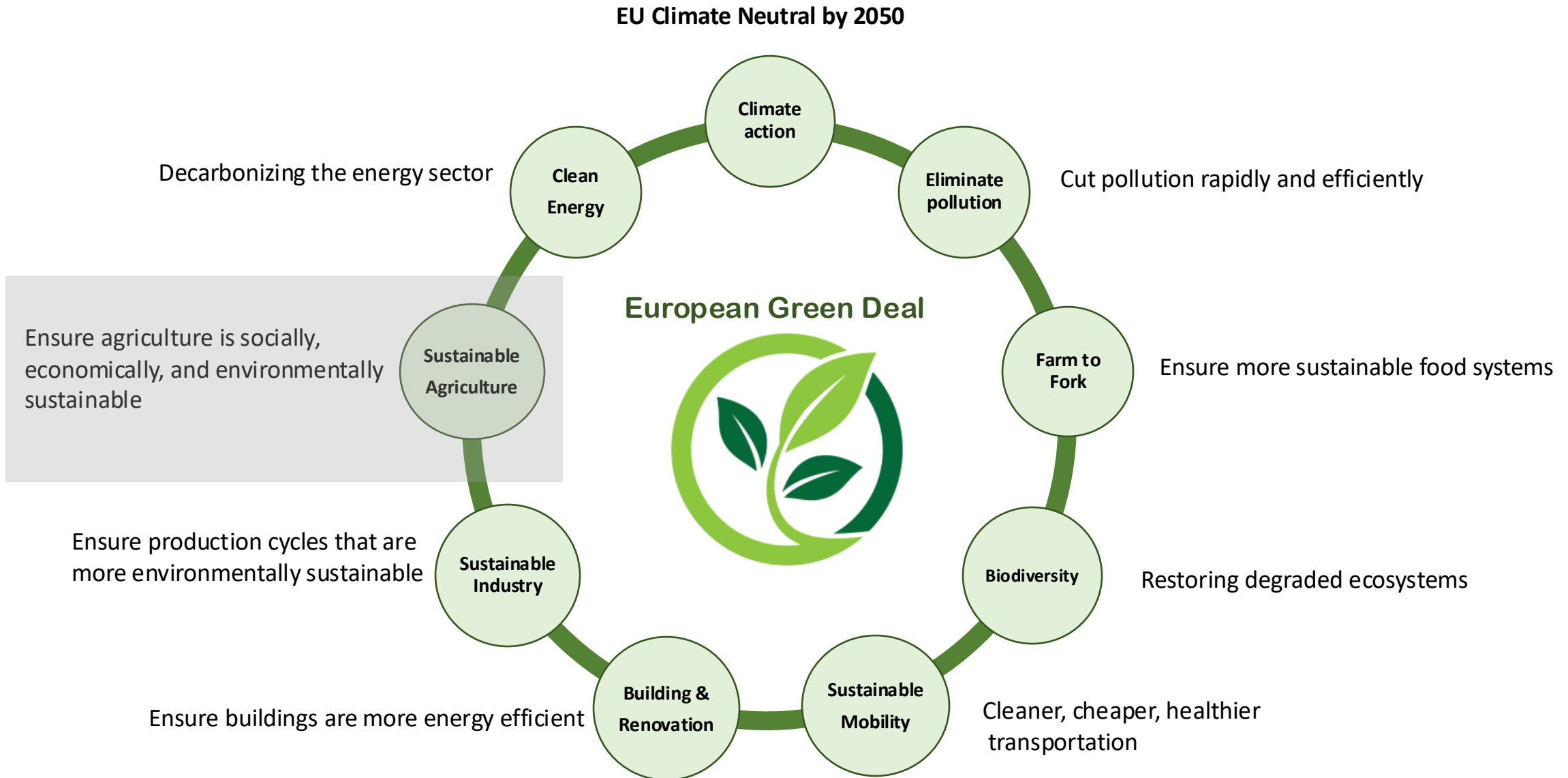
Climate Fact:

Globally, deforestation is the second-largest source of carbon emissions

EUDR Policy rationale:

90% of deforestation is due to the expansion of agricultural land linked to commodities and products in scope. As a major importer and consumer of these commodities, the EU is partly responsible for global deforestation and forest degradation, and it wants to lead the way to solving it.

EUDR is a key element of the European Green Deal



Setting the Rules for Global Markets

EU has managed to become the global ecological policy leader on many fronts:

- Climate change
- Biodiversity
- Chemical regulations
- Waste management
- Privacy policies



The “Brussels Effect”

EU's large market size and stringent standards have enabled it to influence global businesses to adopt EU regulations

Market access: The EU represents a massive market with over 450 million consumers. To access this lucrative market, companies must comply with EU regulations, even if they operate outside the EU.

Cost-Effectiveness: Rather than developing different versions of products or managing varying compliance standards for each country, it becomes more efficient and cost-effective for companies to adopt the EU's stricter regulations as a default global standard.

Example: EU pioneered cookie privacy protection

We value your privacy

We use cookies to enhance your browsing experience, serve personalized ads or content, and analyze our traffic. By clicking "Accept All", you consent to our use of cookies.

[Customize](#) [Reject All](#) [Accept All](#)



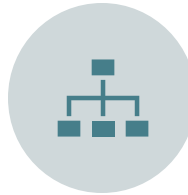
2002: EU ePrivacy Directive

2018: General Data protection
Regulation (GDPR)

Complex web of EU Sustainability Regulations



Corporate Due Diligence Directive (CSDDD)



Corporate Sustainability Reporting Directive (CSRD)



Extended Producer Responsibility (EPR)



Regulation on Packaging and Packaging Waste (PPWR)



Green Claims Directive (GCD)



Carbon Border Adjustment Mechanism (CBAM)

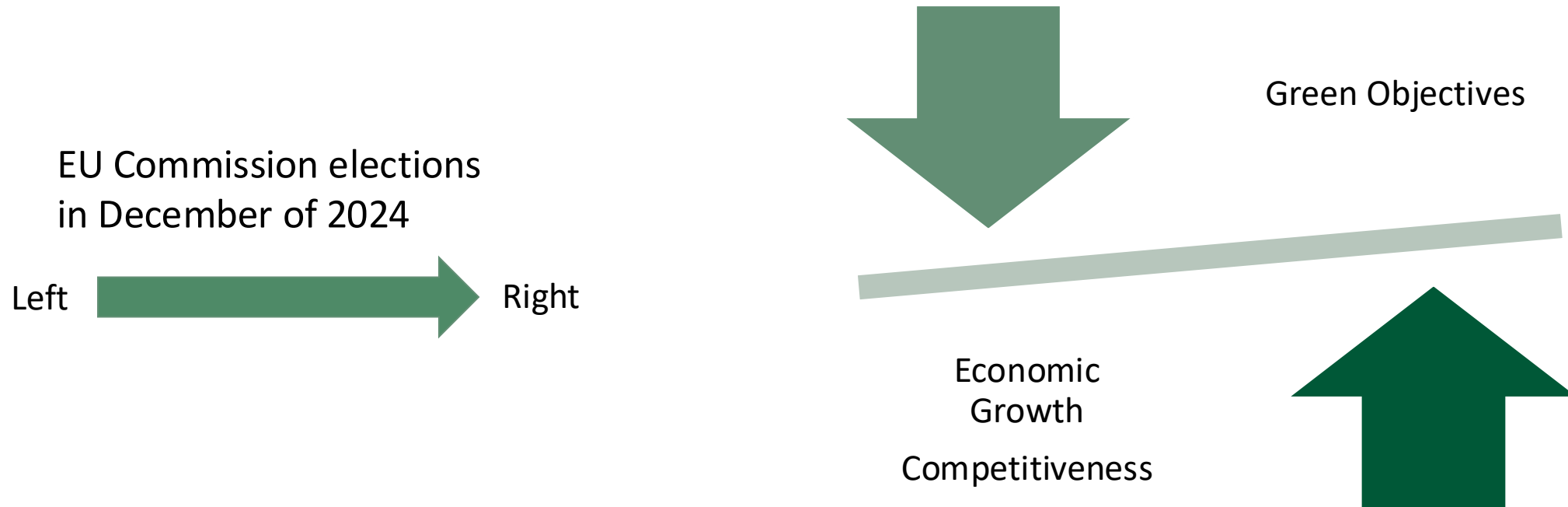


Sustainable Finance Disclosure Regulation (SFDR)



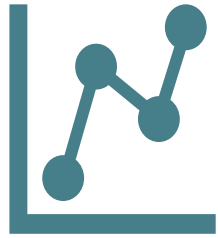
Eco Design for Sustainable Products Regulation (ESPR)

EU Political Landscape is shifting



EU policies in 2025 moved toward reducing regulatory burdens that were limiting economic growth – “Simplification”

EUDR elements important to landowners and land managers



Data/mapping- precise geolocations of all plots of land associated with a product shipment



Definitions- Forest type, deforestation, forest degradation



Deforestation Risk



Privacy protection

EUDR Key Definitions

Global deforestation: *the conversion of forest to agricultural use, whether human-induced or not*

Deforestation-free (wood): *a) it needs to have been harvested from land not subject to deforestation after 31 December 2020; and b) it needs to be harvested without inducing forest degradation after 31 December 2020.*

Forest degradation: *structural changes to forest cover, taking the form of the conversion of primary forests or naturally regenerating forests into plantation forests or into other wooded land, and the conversion of primary forests into planted forests*

The Regulation relies on the definition of 'forest' of the Food and Agriculture Organization (FAO) of the United Nations

Poll Question

True or False ?

The EUDR regulation
dictates how I must
manage my
timberland property in
the future

Poll Question

True or False ?

My privacy will be
compromised by having
my contact information
listed in the EU
Information System

Forest Degradation

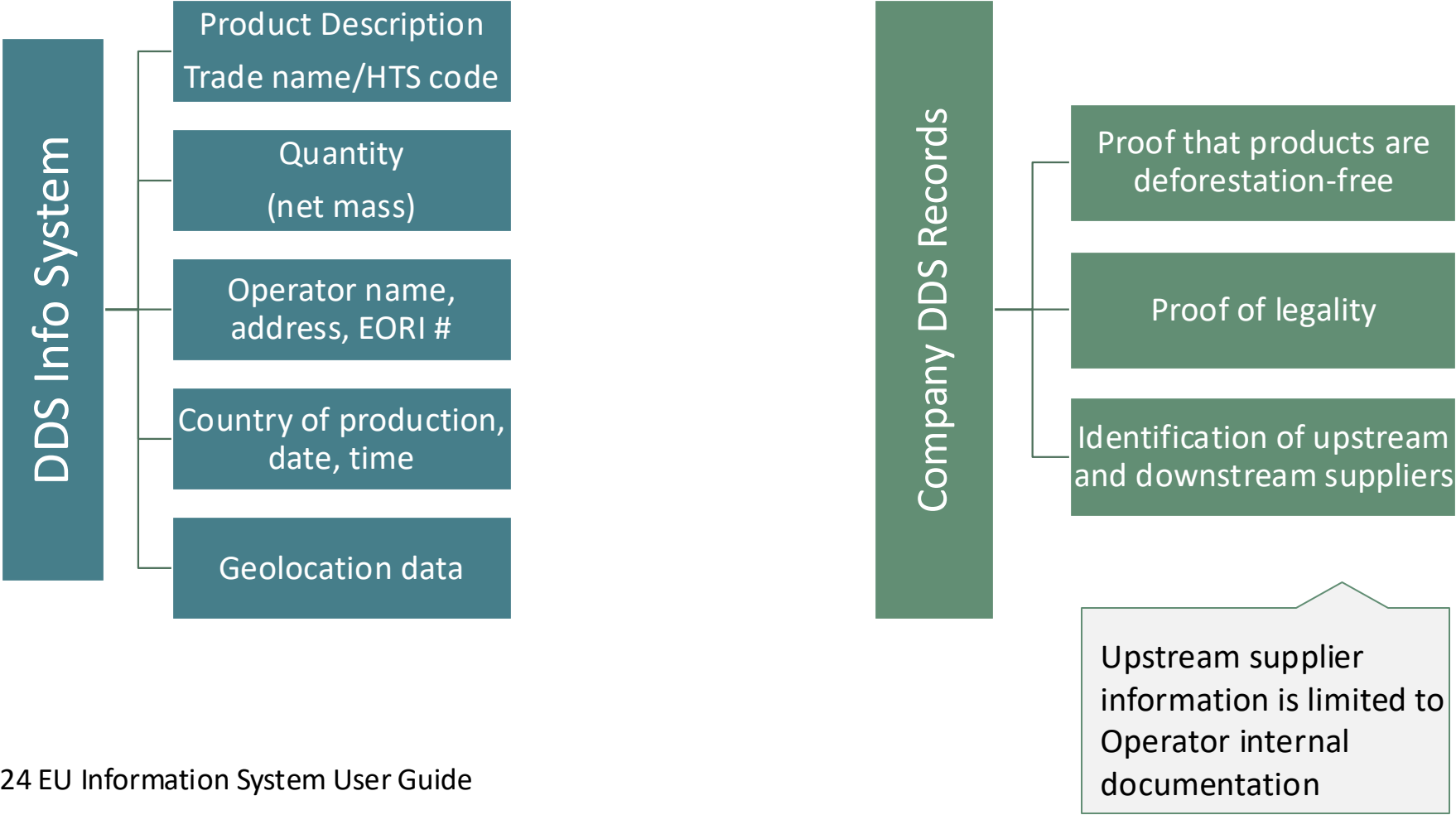
'Forest degradation' means: Structural changes to forest cover, taking the form of conversion of				
1) Primary forests into			2) Naturally regenerating forests into	
a) Planted forests	b) Plantation forests	c) Other wooded land	a) Plantation forests	b) Other wooded land

Key point: EUDR addresses forest degradation driven by the forestry activities associated with wood harvesting and subsequent regeneration of the forest.

- *Other processes, including climate change, disease outbreaks, fires, etc. These potential forms of forest degradation are beyond the scope of the Regulation*

Reference: FAQ Document, April 2025, pg 43-48

EUDR Information Requirements for Operators and Traders (Article 9)



Source: Jan 2024 EU Information System User Guide

Key AF&PA Advocacy Focus Points

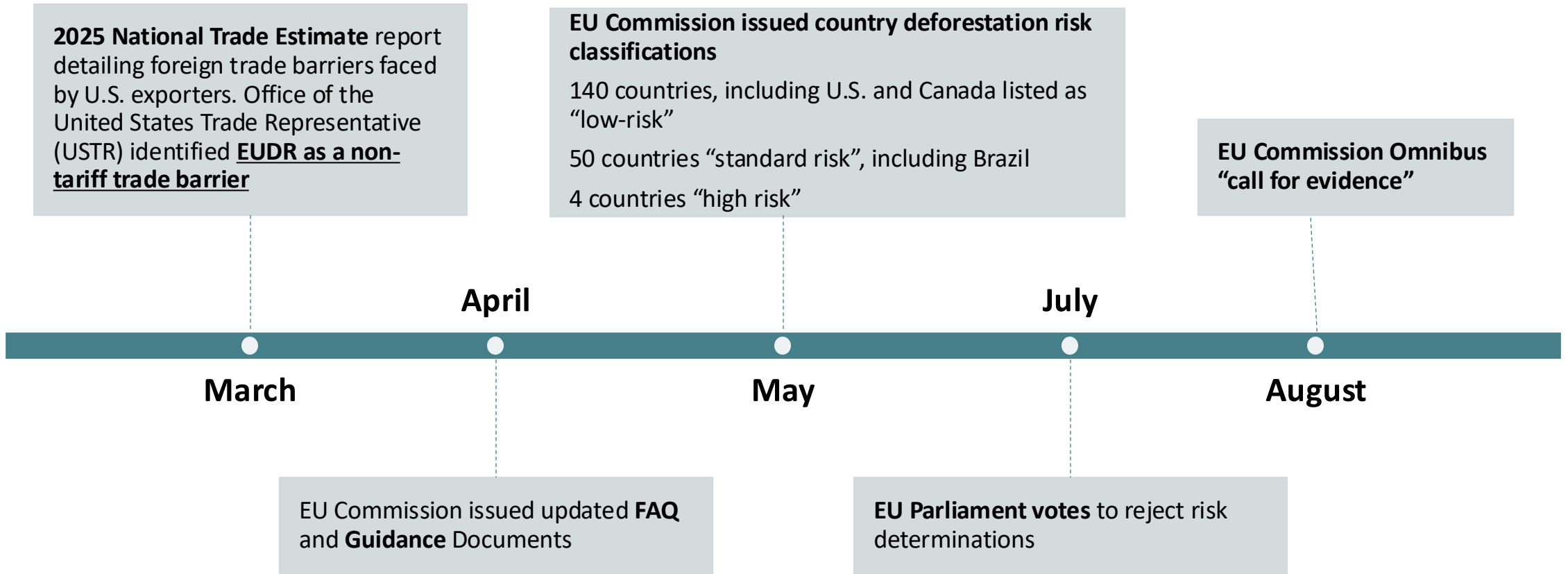
- ***The United States is a negligible deforestation-risk country, and not a source of global deforestation concerns.***
- ***The unnecessary burden EUDR places on U.S. forest products sector will not advance this stated policy goal.***

- EUDR ignores commodity supply chain differences and geographic distinctions related to deforestation drivers
- Abandons regulatory proportionality
- Strict geolocation traceability represents unachievable technical hurdles given the nature of U.S. pulp & paper supply chains
- Equal treatment for non-EU based organizations as EU operators and traders.

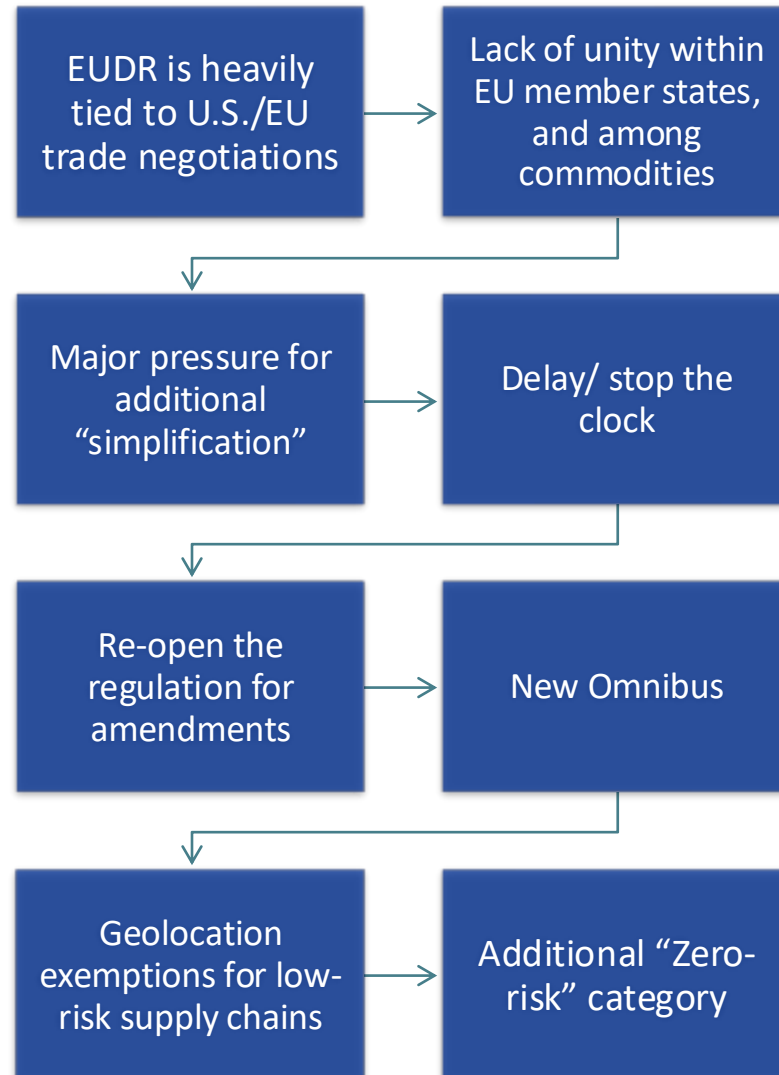
EUDR imposes the same obligations, regardless of deforestation risk

EUDR Due Diligence Requirements	Deforestation Risk Level		
	Low	Standard	High
Product description, including the trade name and type of the relevant products, as well as the common name of the species and their full scientific name	✓	✓	✓
Quantity of relevant products expressed in kilograms of net mass	✓	✓	✓
Country of Production	✓	✓	✓
Precise location of all plots of land that may be associated with the shipment, including dates of production or harvest	✓	✓	✓
The name, postal address and email address of any business or person from whom they have been supplied with the relevant products	✓	✓	✓
The name, postal address and email address of any business, operator or trader to whom the relevant products have been supplied	✓	✓	✓
Adequately conclusive and verifiable proof that the relevant products are free of deforestation or forest degradation risk due to the complexity of the supply chain, mixing, and no circumvention of EUDR has occurred after December 31, 2020.	✓	✓	✓
Conclusive and adequate information that relevant product was produced lawfully in the country of production	✓	✓	✓
Member states Competent Authority compliance checks	1%	3%	9%
Risk Assessment – for products with non-compliance risks	✗	✓	✓
Risk Mitigation – procedures or measures to achieve no, or negligible risk status	✗	✓	✓

2025 EUDR Major Milestones



Current EUDR State of Play- lots of moving parts and ideas



Time is running out



EUDR is a top AF&PA Priority

High engagement with U.S. government

Member Working Group

U.S. forest products value chain coalition

International coordination (FPAC, Cepi, ICFPA)

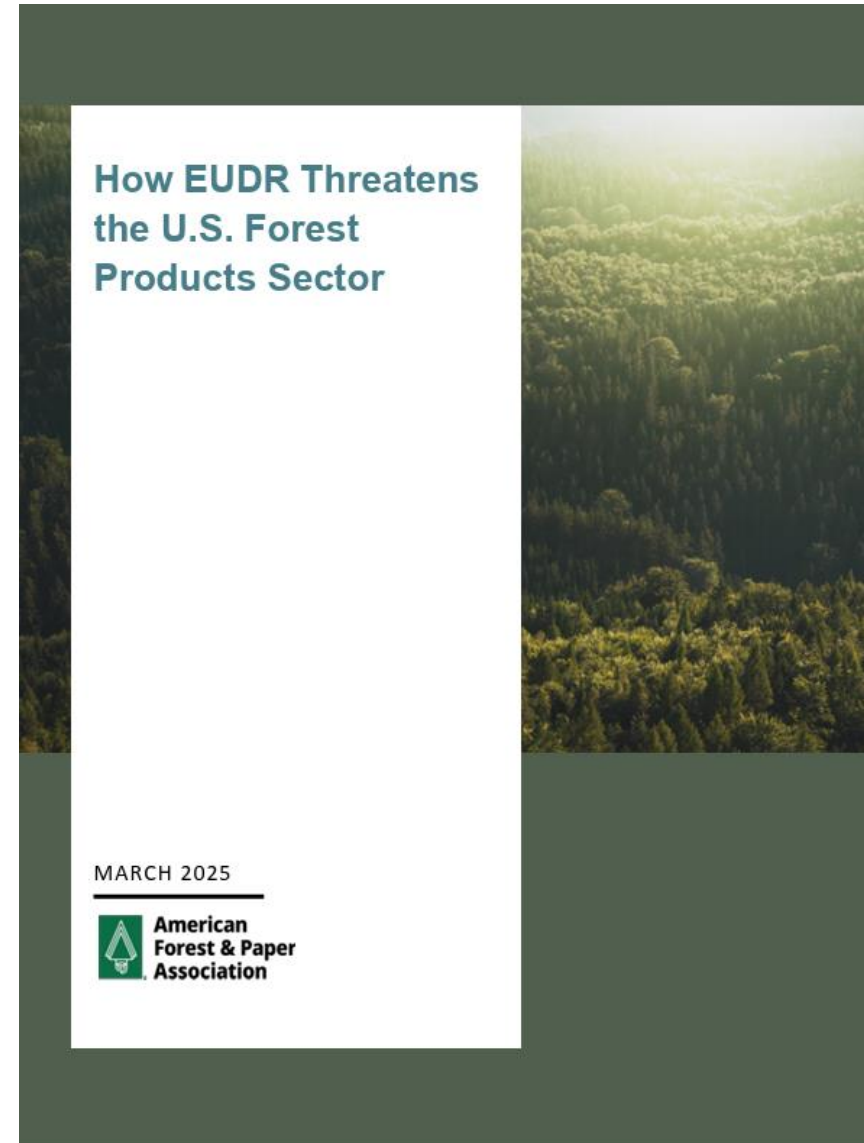
On-the-ground resources- Brussels consultant

AF&PA board guidance

U.S. and EU media

AF&PA website

<https://www.afandpa.org/priorities/how-eudr-threatens-us-forest-products-sector>



Current EUDR State of play

EUDR is part of overall U.S./EU trade deal

Negotiation details continue and are uncertain

Major focus areas for AF&PA members:

- Make EUDR requirements more proportional to the negligible deforestation risk represented by the U.S.
- Clarity on the zero-risk classification threshold requirements to ensure U.S. inclusion
- Reciprocal application of obligations and reporting simplifications for U.S. companies compared to EU companies

Brussels trip scheduled for early October

Final Thoughts

- Transparency and traceability are becoming a global expectation
- EUDR likely to become the template for others to duplicate
- Non-compliance can result in market exclusion and negative reputational effects
- The U.S. and forest products are not the main targets of EUDR.
 - ✓ In terms of EU imports, cocoa and palm oil are the most prominent.
- EUDR is also complicated, problematic, and costly for EU enforcement authorities
- It's not over until it's over

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February 7, 2025

January has been busy, but February is ramping up! Take 4 minutes to read this issue of Delivered to learn about the Pulp & Paperworkers' Resource Council fly-in, tariff updates, new EPA rules and more!

INSIDE THE BELTWAY



Pulp and Paperworkers' Resource Council Educates on Capitol Hill for U.S. Forest & Paper Industry Support

Quick Take: The Pulp and Paperworkers' Resource Council (PPRC) engaged with Members of Congress and administrative officials in Washington, D.C. They educated Members of Congress on the significant role of the U.S. forest products industry in various communities and the manufacturing sector.



bitly



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Questions ?





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