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Joint COCERAL, FEDIOL and FEFAC statement:

The EUDR Simplification Package is Insufficient to Deliver Legal Certainty

COCERAL, FEDIOL and FEFAC, representing the EU trade in cereals, oilseeds, oils and fats and animal feed, the EU vegetable oils and protein meal industry, and the EU compound feed and premix industry, regret that the EUDR Simplification Package falls short of delivering real simplifications and does not improve legal certainty for companies.

As already announced by the Commission, the Simplification Package did not include a proposal for a legislative amendment, which remains the only means to deliver real and legal simplifications and fix inconsistencies, complexities, and ambiguities in the legislation. While the Commission has made efforts to provide simplified and flexible interpretations of ambiguous and constraining or unworkable provisions through FAQs and guidance, these do not have the legal value required to ensure legal certainty and homogeneous enforcement by competent authorities. We also note that the attempted simplification of obligations downstream in last year's amendment to the EUDR has not delivered the expected simplification in practice and leads to inconsistencies due to the dual role of companies, while customers remain concerned about their liability.

We are convinced that a targeted amendment of the EUDR is necessary. FAQs and guidance can only propose marginal new interpretations of the same inconsistent, complex and ambiguous provisions. They leave operators with high uncertainty about their compliance and expose them to possible severe penalties. This Simplification Package fails to provide legal certainty and to resolve the risk of supply disruption. We therefore call on the Commission to reconsider its stance on the need for a targeted amendment with limited legal corrections of the EUDR and are ready to cooperate closely to signal the remaining obstacles to clear, coherent, and workable rules for compliance.

Furthermore, we also reiterate our concerns with the Information System and its artificial limitations. A significant number of problems linked to the design of the Information System remain unaddressed, such as the 25 MB limit, the limited possibility to group due diligence statements (to one level), and the insufficient timeframe (72 hours) for amending a due diligence statement.

end

COCERAL is the European association of trade in cereals, oilseeds, pulses, olive oil, oils and fats, animal feed and agrosupply. It represents the interest of the European collectors, traders, importers, exporters and port silo storekeepers of the abovementioned agricultural products. COCERAL's direct members are located in 14 EU countries, with one European association, Unistock representing the professional portside storekeepers for agribulk commodities within the EU and one associated member in Switzerland. With about 3,000 companies as part of COCERAL national members, the sector trades agricultural raw materials destined to the supply of the food and feed chains, as well as for technical and energy uses. Gafta is an extraordinary member of COCERAL.

FEDIOL, the EU vegetable oil and protein meal industry association, represents the interests of the European oilseed crushers, vegetable oil refiners and bottlers. FEDIOL members are 10 national associations in the EU and the UK and associated company members in 8 other EU countries. With about 180 facilities in Europe, the sector provides 20,000 direct employments. Its members process approximately 55 million tonnes of basic products a year, both of EU origin and imported from third country markets. The sector processes notably rapeseed, sunflower seed, soybeans and linseed into oils and meals for food, feed, technical and energy uses essentially on the European market.

FEFAC, the European Compound Feed Manufacturers' Federation, represents 23 national Associations in 23 EU Member States as well as Associations in Switzerland, Turkey, Serbia, Russia and Norway with observer/associate member status. The European compound feed industry employs over 100,000 persons on app. 3,500 production sites often in rural areas, which offer few employment opportunities.