

7 October 2025

To:

Ursula Von der Leyen, President of the European Commission

Teresa Ribera, Executive Vice President for a Clean, Just and Competitive Transition

Stéphane Séjourné, Executive Vice-President for Prosperity and Industrial Strategy of the European Commission

Jessika Roswall, Commissioner for Environment, Water Resilience and a Competitive Circular Economy

Valdis Dombrovskis, Commissioner for Economy and Productivity; Implementation and Simplification

Maroš Šefčovič, Commissioner for Trade and Economic Security; Interinstitutional Relations and Transparency

Subject: Resisting U.S. pressure to delay or weaken the EUDR

Dear President, Vice Presidents and Commissioners,

The undersigned U.S. civil society organizations would like to express our strong support for the full and timely implementation of the European Union Deforestation Regulation (EUDR) and urge the European Commission not to yield to efforts by the U.S. government and forest industry lobby to delay or weaken the law.

The EUDR is a landmark measure with the potential to transform global supply chains at a critical moment in the fight against climate change and biodiversity loss. With the U.S. government rolling back key environmental protections and climate change mitigation actions, it is more important than ever for the European Union to maintain its global leadership and vision.

We are particularly concerned by the Commission's apparent willingness to offer the U.S. special treatment under the EUDR as part of ongoing EU-U.S. trade negotiations, on the basis of claims the U.S. poses negligible risk of deforestation and forest degradation.¹ This designation, which reflects claims being made by the U.S. forest industry lobby led by the American Forest and Paper Association,² is inconsistent with current U.S. forest policies and on-the-ground realities. The U.S. government has recently announced plans to rescind restrictions on road development and logging in approximately 238,000 km² of national forest, of which roughly 60% is old growth or mature forest.³ Furthermore, President Trump has directed agencies to significantly increase timber production on more than one million km² of federal lands and weaken environmental protections,⁴ including the elimination of key safeguards for wildlife habitat under the landmark Endangered Species Act,⁵ and rollback of transparency and environmental assessment requirements for projects on public forestland under the National Environmental Policy Act.⁶

The picture on the ground also contradicts claims the U.S. poses a negligible risk. For example, government data and civil society reports have documented widespread conversion of forests in the southeastern United States to monoculture plantations for biomass production, with the EU as a major destination market.⁷

Many U.S. and global companies with complex commodity supply chains have already signaled their readiness for EUDR compliance. Major U.S. commodity trader ADM stated in 2024 that it was on track to provide EUDR-compliant soy products by the year's end.⁸ U.S. soy producers increasingly recognize that deforestation-free supply chain requirements represent a competitive advantage in accessing the EU market, which USDA data valued at US\$ 2.45 billion in 2024.⁹ Mars Wrigley and other major food companies operating in the U.S. have also come out against further EUDR delays.¹⁰ With many companies announcing they're ready to meet EUDR requirements, it raises questions about whether those still seeking a delay face real feasibility challenges or are simply unwilling to comply.

Further delay or weakening of the EUDR would create regulatory uncertainty, penalize the many companies in Europe and around the world that have already invested in compliance, and disincentivize other jurisdictions—including U.S. states—from adopting complementary measures. Exemptions resulting from political pressure, particularly where countries and industries cannot credibly demonstrate forest protection commitments or practices, would undermine the integrity of the EUDR and reward laggards while undermining the fair and equitable application of the regulation that is central to its design.

We urge the European Commission to resist pressure from U.S. special interests and take the necessary steps to ensure the EUDR comes into effect at the end of the year. We are already seeing unprecedented positive impacts around the world as the EUDR incentivizes companies and countries to remove deforestation and forest degradation from supply chains and production; now is not the time to backtrack. We need strong EU leadership more than ever.

Respectfully,

Center for Biological Diversity

CERES

Dogwood Alliance

Environmental Investigation Agency

Environmental Paper Network

Friends of the Earth US

Mighty Earth

Natural Resources Defense Council

NETWORK Lobby for Catholic Social Justice

Rainforest Action Network

Sierra Club

Sisters of Mercy of the Americas Justice Team

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- ¹ https://policy.trade.ec.europa.eu/news/joint-statement-united-states-european-union-framework-agreement-reciprocal-fair-and-balanced-trade-2025-08-21_en
- ² <https://www.afandpa.org/priorities/how-eudr-threatens-us-forest-products-sector;>
<https://www.afandpa.org/sites/default/files/2025-03/FINAL%20ForestProductsEUDRLettertoPresidentTrump.pdf>
- ³ <https://www.usda.gov/about-usda/news/press-releases/2025/06/23/secretary-rollins-rescinds-roadless-rule-eliminating-impediment-responsible-forest-management;> <https://www.nrdc.org/press-releases/roadless-rule-remains-shield-against-logging-threats-americas-forests;> <https://www.whitehouse.gov/presidential-actions/2025/01/unleashing-alaskas-extraordinary-resource-potential/>
- ⁴ [https://www.whitehouse.gov/presidential-actions/2025/03/immediate-expansion-of-american-timber-production/;](https://www.whitehouse.gov/presidential-actions/2025/03/immediate-expansion-of-american-timber-production/) <https://www.theguardian.com/us-news/2025/mar/03/trump-national-forest-executive-order>
- ⁵ <https://www.federalregister.gov/documents/2025/04/17/2025-06746/rescinding-the-definition-of-harm-under-the-endangered-species-act;> <https://www.npr.org/2025/04/17/nx-s1-5366814/endangered-species-act-change-harm-trump-rule>
- ⁶ <https://www.usda.gov/about-usda/news/press-releases/2025/06/30/secretary-rollins-rolls-back-overly-burdensome-environmental-regulations-unleash-american-innovation;> <https://westernlaw.org/nepa-rollback/>
- ⁷ https://www.srs.fs.usda.gov/pubs/gtr/gtr_srs168.pdf; <https://media.dogwoodalliance.org/wp-content/uploads/2022/11/NRDC-Investigation-Updated-2022.pdf>
- ⁸ <https://www.adm.com/en-us/news/news-releases/2024/7/as-eu-deforestation-regulation-approaches-adm-offers-fully-verified-segregated-traceable-soybean-meal-and-oil-to-european-customers/>
- ⁹ [https://www.ilsoy.org/clearing-the-path/;](https://www.ilsoy.org/clearing-the-path/) <https://www.fas.usda.gov/data/commodities/soybeans>
- ¹⁰ <https://voicenetwork.cc/news-updates/cross-commodity-group-of-companies-urges-eu-to-not-reopen-eudr/>