



Commerce Équitable France
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Mrs Jessika Roswall
European Commissioner for Environment, Water resilience
and a Competitive Circular Economy

Subject: Ensuring a Responsible and Pragmatic Implementation of the EUDR

Paris, October 8th 2025

Dear Mrs Roswall,

In the context of the ongoing implementation of the European Union Deforestation Regulation (EUDR), the members of Commerce Équitable France would like to draw your attention to the current challenges faced by fair trade supply chains. We acknowledge the technical difficulties related to the use of the Information System, as mentioned by the European Commission in its letter of 23 September, and wish to highlight their impact on the effective and timely compliance of our partners.

Fair trade actors are fully committed to complying with the obligations set out in the regulation. Over the past few years, significant investments have been made to support producers and their organizations, as well as to establish robust traceability systems. Many fair trade cooperatives of the cocoa and coffee value chains already operate functioning traceability systems, despite ongoing technological challenges and the constraints associated with updating databases. Any further postponement would seriously undermine the collective efforts and investments already made by all stakeholders in the affected supply chains.

Our partners from producing countries also emphasize the fact that producers and producer organisations have not always received the technical and financial support necessary to demonstrate compliance with the new European requirements. This situation underscores the need for European companies covered by the EUDR to fully assume their responsibilities by ensuring a fair sharing of value and supporting the investments in traceability of their suppliers, while safeguarding the autonomy of cooperatives and their control over their traceability systems.

A reliable and consistent regulatory framework is essential to send clear signals and to achieve the objectives of the EUDR. Together with European companies and NGOs, we call on the European Commission to stay the course and to avoid any delay or reopening of the regulation by:

- Recognizing the technical difficulties related to the management of the Information System as cases of force majeure that hinder the compliance process;



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- Establishing a six-month suspension period for controls and sanctions, allowing time to address the identified technical issues, without changing the initial entry-into-application date;
- Ensuring that companies subject to the EUDR assume their technical and financial responsibility in supporting partner cooperatives, in line with Article 11 of the regulation, while preserving their autonomy.

Adopting such a pragmatic solution would acknowledge the current technical constraints without fueling a dynamic of repeated postponements and would remain consistent with the objectives of the EUDR.

Explicitly recognizing these technical challenges as cases of force majeure would help maintain the ongoing momentum toward compliance and a just transition. It would also send a strong signal to the sector regarding the importance of shared responsibility and equitable distribution of investments.

Yours sincerely,