



PRESS RELEASE

EU's Deforestation Information System is in need of significant improvement!

Today the European State Forest Association (EUSTAFOR) organized an event, "Practical implementation of the EU Deforestation Regulation in state forests". The event was very timely as the Commission and Member States' authorities are working on securing all relevant pre-conditions for the implementation of the Regulation which will be applicable of 30 December 2024.

To demonstrate that there is no deforestation occurring on a specific location, operators will be obliged to collect and report certain data and geographic coordinates of the plots of land where the commodities were produced. The geolocation coordinates need to be provided as part of due diligence statements (DDS) that must be submitted to the envisaged Information System ahead of placing products on the EU market or exporting them.

Most of the EUSTAFOR members already have very detailed, precise and well working timber tracking systems in place. Nevertheless, the planned EU information system as it is presented in the recent testing organized by the European Commission, does not allow for any transfer of information between the two systems but rather opts for almost completely manual data entry. This brings not only a higher financial and bureaucratic burden, but also an increased risk of serious errors. Furthermore, there are growing concerns of data protection and data security as it remains unknown who oversees the data management. The data of the operator and their management are part of competitive advantages and the market intelligence of the operators.

EUSTAFOR Members, acting as custodians of state-owned forest assets, are highly concerned about the quality of the proposed DDS and the credibility of an emerging number of private parties around the globe offering to facilitate due diligence submissions, hence having access to critical data information about the assets they manage.

All these concerns were expressed by European State Forest Management organizations (SFMOs) during the EUSTAFOR event with a clear call to the Commission to ensure:

- Analysis of (I) existing and (II) effective IT systems that already document the chain of custody adequately. This is accompanied by an analysis of the usability and applicability of these systems for operating the DDS as part of the EUDR;
- Full data security and a guarantee of no-breach and misuse of data;
- Involvement of all stakeholders along the entire value chain to develop or further develop a suitable system to fulfil the EUDR objectives and the DDS requirements;
- Structural (organisational) & cost-related impact assessment before further implementation of EUDR;

EUSTAFOR sincerely expresses its expectation that the further implementation of the Regulation will be paused until appropriate conditions as mentioned above are provided. No endorsement by those who are frontrunners in timber tracking would result in a total failure of the implementation of this Regulation.

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For more information about EUSTAFOR:

Please visit our website at $\underline{www.eustafor.eu}$ and follow $\underline{@EUSTAFOR}$ on Twitter.

EUSTAFOR was established in 2006. Its 39 members are state forest management organizations from 27 European countries. These organizations practice sustainable forest management in approximately 1/3 of the EU's forest area, including more than 16 million hectares of designated Natura 2000 sites and other forests protected by law. They harvest approximately 145 million m^3 of round timber annually and, together, employ close to $130\,000$ people.

