

**Question for written answer E-003593/2025
to the Commission**
Rule 144
Christine Anderson (ESN)

Subject: Justification for internal market documentation requirements for imports checked at EU's external borders under the EUTR and EUDR

Regulation (EU) No 995/2010 (EU Timber Trade Regulation or EUTR) will gradually be replaced by Regulation (EU) 2023/1115 (EU Deforestation Regulation or EUDR). While timber felled before 29 June 2023 will still fall under the EUTR until the end of 2028, all new timber products will be exclusively subject to the EUDR as of 30 December 2025 (or 30 June 2026 for those produced by micro and small enterprises). Despite reference numbers having to be provided in customs declarations, further internal market documentation will still be required.

In August 2025, the Commission published supplementary guidelines and FAQs, which provide for collective declarations, the reuse of existing due diligence declarations, and, in some cases, annual rather than occasional submissions (see DRSC, Guidelines/FAQs dated 12 August 2025). While these changes do lighten things to some extent, the fundamental issue of businesses facing a double burden remains.

1. Based on what legal grounds and demonstrating what proportionality does the Commission justify having internal market obligations on top of external border checks?
2. What will be done to ensure that companies do not face double or conflicting obligations during the EUTR/EUDR transition until 2028?
3. Following the introduction of the digital system (EUDR-IS/TRACES) and mandatory customs checks, does the Commission plan to review and, if necessary, remove the internal market obligations?

Submitted: 17.9.2025