

(English version)

**Question for written answer E-002228/25
to the Commission**

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(4 June 2025)

Subject: Exclusion of finished products from the scope of Regulation (EU) 2023/1115

The EU Deforestation Regulation (EUDR) imposes obligations and restrictions on operators selling certain products. However, the list of products appears arbitrary at times including as it does only raw materials but not finished products. This is the case for coffee, which is included under harmonised customs code 0901. Instant coffee, however, or products based on this substance (covered by customs codes 2101 11 and 2101 12) fall outside its scope, even though they are made from the same raw material.

This disparity distorts competition, placing as it does European producers at a disadvantage since they are subject to due diligence obligations, thus incurring risks and costs, thereby encouraging the import of finished products from outside the EU.

Can the Commission therefore:

1. Disclose and clarify the principles and criteria selected to decide on the inclusion or exclusion of goods originating from the same raw material, with particular reference to coffee?
2. Clarify whether it considers the risk of deforestation to be lower for finished products from third countries?
3. Specify whether it intends to include instant coffee or, alternatively, to exclude coffee completely from the scope of the EUDR, and whether these changes will be made at the same time to avoid distortions of competition between different segments of the sector?

Submitted: 4.6.2025

Answer given by Ms Roswall on behalf of the European Commission
(26 August 2025)

The Commission is committed to implementing EU rules on deforestation in a spirit of close partnership, transparency, and open dialogue. Its aim is to reduce administrative burden for companies while preserving the goals of the EU Deforestation Regulation (EUDR) ⁽¹⁾.

The Commission will continue to work very closely with all stakeholders, to ensure that EU rules deliver on reducing global deforestation and forest degradation in the least burdensome way for companies that should not jeopardise EU competitiveness.

The principles and scientific evidence used by the Commission to define the list of relevant commodities and relevant products covered by the EUDR are included in the Staff Working Document on the impact assessment accompanying the proposal for EUDR ⁽²⁾.

On 15 April 2025, the Commission published a package of measures ⁽³⁾ ensuring further simplifications and reducing the administrative burden to facilitate the implementation of the EUDR.

The package included a draft Delegated Act to provide further clarifications and simplification on the product scope of EUDR. The draft Delegated Act has been subject to the mandatory 4-week public feedback.

The Commission is currently reviewing relevant contributions received from stakeholders, including those provided by the coffee sector.

⁽¹⁾ Regulation (EU) 2023/1115 of the European Parliament and of the Council of 31 May 2023 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010, OJ L 150, 9.6.2023, p. 206-247.

⁽²⁾ https://environment.ec.europa.eu/topics/forests/deforestation/regulation-deforestation-free-products_en.

⁽³⁾ https://ec.europa.eu/commission/presscorner/api/files/document/print/en/ip_25_1063/IP_25_1063_EN.pdf.