

(English version)

**Question for written answer E-003593/25
to the Commission
Christine Anderson (ESN)
(17 September 2025)**

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

**Answer given by Ms Roswall on behalf of the European Commission
(27 January 2026)**

The EU Deforestation Regulation (EUDR) ⁽¹⁾ applies even handedly to products produced inside and outside the EU, similarly to the EU Timber Regulation (EUTR) ⁽²⁾, in compliance with EU's international commitments including World Trade Organisation requirements and EU trade agreements.

Pursuant to Recital 85 of the EUDR, in accordance with the principle of proportionality, the regulation does not go beyond what is necessary in order to achieve its objectives.

The entry into application of the EUDR repeals the EUTR, meaning that the products in its scope cannot be subject to double or conflicting provisions.

Chapter 3 of the EUDR Guidance ⁽³⁾ document provides information and a dedicated decision table on the applicable legislation, depending on the date of production and date when the product was placed on the market.

The Commission presented a proposal to amend the EUDR in order to reduce the load on the EUDR Information System and ease the administrative burden for economic operators, while maintaining the regulation's environmental integrity. On 4 December 2025, the co-legislators agreed on the revised EUDR ⁽⁴⁾.

The new date of entry into application will be 30 December 2026 for all companies except for most micro- or small operators, for which it will be 30 June 2027. For micro- or small operators already covered by the EU Timber Regulation, the entry into application will be 30 December 2026.

The amendments to the EUDR also limit the obligation to submit due diligence statements to the first operator placing the relevant products on the market.

⁽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⁾ Regulation (EU) No 995/2010 of the European Parliament and of the Council of 20 October 2010 laying down the obligations of operators who place timber and timber products on the market, OJ L 295 12.11.2010, p. 23.

⁽³⁾ Commission Notice — Guidance Document for Regulation (EU) 2023/1115 on Deforestation-Free Products, OJ C, C/2025/4524, 12.8.2025.

⁽⁴⁾ Regulation (EU) 2025/2650 of the European Parliament and of the Council of 19 December 2025 amending Regulation (EU) 2023/1115 as regards certain obligations of operators and traders, OJ L, 2025/2650, 23.12.2025.

Downstream operators, such as retreading industry or craft businesses, will no longer need to submit due diligence statements, nor to pass on the reference numbers further in the supply chain.
