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## NOTE

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From:	General Secretariat of the Council
To:	Delegations
Subject:	AOB item for the meeting of the "Agriculture and Fisheries" Council of 27 and 28 October 2025: Immediate actions required: addressing EUDR implementation challenges - <i>Information from Latvia, supported by Bulgaria, Czechia, Estonia and Poland</i>

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The EU Deforestation Regulation (EUDR), which entered into force on June 29, 2023, aims to minimise the trade within the EU of commodities and products that cause deforestation and forest degradation worldwide, thereby ensuring the reduction of greenhouse gas emissions and global biodiversity loss.

Since 2024, Latvia, along with many other EU Member States, has repeatedly indicated that while the EU initiative to reduce global deforestation and forest degradation is welcomed, the conditions of the EU Deforestation Regulation are disproportionate with respect to EU farmers, timber producers, and food manufacturers.

The implementation of the EU Deforestation Regulations requirements, intended to protect the EU market from goods not produced according to the highest sustainability standards, imposes a disproportionately large administrative and financial burden on EU farmers, foresters, food producers, and other related sectors, relative to the Regulation's stated objective - to avoid deforestation in locations where it occurs.

It must be emphasized that Latvia already has national regulation in force regarding the deforestation process, which aims to avoid the conversion of forest to other land use types (the objective of the Deforestation Regulation). The national regulation is based on the principle that if a landowner wishes to carry out deforestation, compensation must be paid to the state for the respective area, or the planned activity must be compensated by planting a forest elsewhere in the country.

Consequently, it can be considered that the EU Deforestation Regulation is essentially implemented in Latvia through existing legislation, and therefore, the risk of deforestation in Latvia is negligible in substance.

The recent announcement to further postpone the date of entry into force of the Regulation by one year, because of deficiencies in the IT systems, is understandable to Latvia. Latvian companies involved in testing the information system have also raised concerns about its speed and capacity to process large volume of data in a short time, which would result in significant financial and human resource consumption. This, in turn, reduces the competitiveness of EU companies in external markets.

In view of the above, Latvia calls for the following actions:

- to postpone the date of entry into application of the EU Deforestation Regulation by at least one year;
- to review requirements and simplify its conditions including introduction of a "no-risk" category.

Furthermore, we call on the Commission to re-evaluate the impact assessment comparing the costs of implementing the EU Deforestation Regulation with the expected practical results. If the administrative and financial burden on Member States is found to be disproportionate to the intended objective, the abolition of EU Deforestation Regulation may be reconsidered.