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NOTE

From:	General Secretariat of the Council
To:	Delegations
Subject:	AOB for the Council (Environment) meeting on 4 November 2025 Current legislative proposals Urgent need for postponement and substantive simplification of the EU Deforestation Regulation (EUDR) - Information from Austria

Austria generally welcomes the objectives of the EU Deforestation Regulation (EUDR), namely to combat global deforestation and forest degradation. Sustainable forest management is essential for developing climate-resilient forests, ensuring species diversity, and strengthening the bioeconomy. In a joint effort across the EU, the area covered by forests in Europe increased by 160 000 square kilometres between 1990 and 2025. This shows the reduced risk of deforestation in EU Member States.

Throughout the process of national implementation of the EUDR, which formally entered into force on 20 June 2023, several Member States have repeatedly expressed their serious reservations regarding legal uncertainties and the overall complexity of the Regulation¹. In this context, Member States have highlighted, among other things, the lack of targeted measures to achieve the EUDR's overall goal and the disproportionate burden the EUDR places on producers and administrations within the EU.

On 21 October 2025, the Commission submitted a proposal to amend the EUDR², presenting this as an important step forward in fulfilling commitments to provide simplifications. However, this proposal falls far short of expectations, despite the repeated requests of numerous Member States and affected businesses. Moreover, despite the announcement of yet another postponement of the date of application of the EUDR, the Commission now intends to proceed without extending the application and implementation period, instead suggesting only a six-month 'grace period'.

This course of action not only undermines general trust in legal certainty and planning security, but also uses deadline pressure to avoid any meaningful negotiations with the co-legislators on substantive policy improvements for European actors along the supply chain.

¹ **AOB at the AGRIFISH Council meeting on 25 March 2024**, supported by Austria, Finland, Italy, Poland, Slovakia, Slovenia and Sweden, calling for urgent action to address challenges posed by the EUDR.

AOB at the AGRIFISH Council meeting on 26 May 2025, supported by Luxembourg, Austria, Bulgaria, Croatia, Czechia, Finland, Italy, Latvia, Portugal, Romania and Slovenia, calling for substantial simplification.

² 14329/25.

Given the extreme time pressure, Austria thus calls for:

- 1. an immediate “Stop-the-Clock”** for one year on EUDR implementation for all operators, until genuine discussions on effective simplifications have been concluded;
 - 2. substantive revision of the EUDR**, including, among other things, a risk-based country/region categorisation with exemptions for insignificant-risk areas;
 - 3. concrete simplification measures**, including *de minimis* thresholds, recognition of existing systems, and minimal reporting requirements along the value chain;
 - 4. a proper policy process** with adequate time for technical examination, rather than rushed adoption under time pressure.
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