

## Position paper:

# EU Deforestation Regulation (EUDR) implementation

### Executive summary

This paper presents the position of CLEPA, the European Association of Automotive Suppliers, on the implementation of the EU Deforestation Regulation (EUDR).

CLEPA and its members fully support the objectives of the EUDR, in particular the fight against global deforestation and the ambition to strengthen sustainable and responsible supply chains. At the same time, members are increasingly concerned that the way the Regulation is currently being implemented risks creating disproportionate administrative burdens and legal uncertainty, without delivering corresponding environmental benefits.

This paper highlights the main practical difficulties encountered in applying the EUDR and to identify pragmatic improvements that could be achieved at implementation level in order to ensure that the Regulation remains workable, proportionate and effective.

### **Key policy ask: Focus obligations exclusively on the first placer on the EU market**

**EUDR obligations should be clearly limited to the first operator placing goods on the EU market, typically the importer. Exempting downstream operators fully from Due Diligence Statements (DDS) related obligations would enable a swift and effective implementation by reducing duplication and administrative burden while maintaining accountability where it is most efficient.**

### **Why EUDR downstream obligations are disproportionate and ineffective**

#### **1. Administrative burden and lack of leverage**

Downstream operators face significant administrative obligations, including requirements related to the handling, storage and transmission of DDS, even where they have limited ability to influence deforestation risks. These requirements generate duplication across the supply chain and limited added value for deforestation prevention.

#### **2. Uncertainty in product and material categorisation**

Implementation is further complicated by ambiguities in product and material classification, especially regarding the distinction between natural and synthetic rubber and materials. Existing customs codes (HS/CN) do not provide sufficient clarity, leading to costly investigations even where products are predominantly synthetic or contain only trace amounts of EUDR relevant materials. This creates operational uncertainty and increases compliance costs.

#### **3. Disproportionate compliance burdens**

Many CLEPA members identified that only minuscule amounts of their purchased goods are in scope of EUDR by customs code and are imported from outside EU. One CLEPA member reported that only 0.07% of purchased parts are subject to EUDR, yet compliance efforts, including assessment,

investigation and engagement required more than 80 man-hours. Certain complex assemblies are currently covered by customs codes listed in the EUDR, triggering extensive compliance assessments, even where the final product does not qualify as an EUDR-relevant commodity in substance or contains only negligible amounts of relevant materials. Compounding these challenges, the current framework applies uniform obligations with limited differentiation based on actual deforestation risk, country of origin, or commodity risk profile. This one-size-fits-all approach undermines the effectiveness of enforcement and the efficient allocation of resources. CLEPA members also observe overlaps with existing due diligence frameworks, including the Corporate Sustainability Due Diligence Directive (CSDDD) and national legislation such as Germany's LkSG. Legal uncertainty persists, particularly regarding whether certain requirements constitute obligations of means or results, increasing the risk of divergent interpretations and further complicating compliance.

### **Additional primary implementation improvements**

- **Clarify material definitions and customs codes application**

Implementation could be improved by providing clear and practical definitions distinguishing natural from synthetic materials, standardising acceptable methodologies for demonstrating synthetic content, and reassessing the inclusion of customs codes that predominantly cover materials with no deforestation risk, such as HS codes starting 4016.

- **Introduce proportionate thresholds and exemptions**

Clear thresholds or exemptions could be introduced for products and operators with negligible EUDR relevant content or volumes (e.g. samples), ensuring that compliance efforts are proportionate to actual deforestation risk and allowing authorities and companies to focus resources on higher risk supply chains.

- **Ensure coherence with existing due diligence legislation**

Greater alignment with existing EU and national due diligence frameworks would help avoid duplication and inconsistencies. In particular, clarifying that human rights due diligence requirements under the EUDR constitute obligations of means would enhance legal certainty and support consistent enforcement.

- **Apply a more explicit -risk based and phased approach**

A stronger focus on high-risk countries and commodities would improve both efficiency and environmental outcomes. A phased implementation approach could allow authorities to prioritise enforcement where risks are highest, while simplifying obligations for goods originating from low or negligible risk areas.

### **Conclusion**

CLEPA and its members remain committed to the objectives of the EUDR and to contributing constructively to its effective implementation. However, **adjustments at implementation level are necessary** to ensure that the Regulation is proportionate, risk based and workable in practice.

CLEPA therefore encourages the European Commission to consider the improvements outlined above, in order to strengthen the effectiveness of the EUDR while safeguarding both environmental integrity and the competitiveness of European industry.

## **About CLEPA**

CLEPA, the European Association of Automotive Suppliers based in Brussels, represents over 3,000 companies, from multi-nationals to SMEs, supplying state-of-the-art components and innovative technology for safe, smart and sustainable mobility, investing over €30 billion yearly in research and development. Automotive suppliers in Europe directly employ 1.7 million people in the EU.

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