

COM/2025/652 Proposal for a Regulation amending Regulation (EU) 2023/1115 as regards certain obligations of operators and traders

1. Minister Muir recently stated, “The proposed simplifications and one-year delay to the application of the EU deforestation regulation (EUDR) will be welcomed by businesses.” The assessment of impact states, “The simplifications in the proposal are likely be welcomed by local businesses, given the potential to reduce reporting requirements and administrative burden.” However, it further notes, “DAERA understands that Defra has been consulting with businesses on the EUDR as it is the lead department...DAERA has not actively engaged with stakeholders, other than signposting to Defra”. What views have been expressed by businesses on the proposed EU act?

Defra have advised that ‘the UK Government is conducting ongoing engagement with businesses and trade associations within sectors in scope of EUDR. The UK Government also engage with businesses through the Joint Customs Consultative Committee chaired by HMRC. We have not engaged businesses on the EU proposal as it has not been finalised, we continue to monitor the progress of the proposal’.

2. Can you tell us more about your discussions with the Department for Environment, Food and Rural Affairs on the proposed EU act? How might the proposal impact any alignment or divergence in this area?

DAERA officials received the draft UK Explanatory Memorandum relating to this proposal for review. DAERA officials also sent the Initial Assessment of Impact to Defra for their consideration and clearance. Other communication has focused on how best to keep stakeholders up to date.

The proposal is only related to the delay in the application of EUDR, it is not possible to provide an assessment of the impacts of EUDR itself ahead of the UK Government’s decisions on deforestation policy.

Nonetheless, Defra have advised that, ‘the UK Government recognises the urgency of taking action to ensure that UK consumption of forest risk commodities is not driving deforestation. By doing so, we aim to support more sustainable supply chains, thereby helping to underpin UK growth and security. The UK Government will set out our approach to addressing UK consumption of forest risk commodities as soon as possible’.

3. In DAERA’s assessment, is the proposed delay long enough for businesses to comply with the new requirements?

As the EU proposal has not yet been made into law, Defra have advised that *the UK Government awaits the outcome of the EU process to fully determine the readiness of businesses to comply.*

4. The EUDR is a complex Regulation and this proposed EU act aims to simplify the implementation of the existing rules – in DAERA’s view, does the proposed EU act simplify the obligations for businesses sufficiently?

Defra have advised that *‘as well as the delay to application, the proposal also introduces further simplification measures including reduced requirements on downstream operators, micro and small primary operators, and removing certain printed products from being in scope.*

Additionally, under this EU proposal, the EU commission is required to conduct a simplification review, presenting a report on this by 30 April 2026. The report should evaluate the impact and administrative burden of the EUDR, particularly for smaller operators, and indicate ways to address the identified issues, including through guidelines and improvements to the information system. The report should, where appropriate, be accompanied by a legislative proposal.

The EU proposal has not yet been made into law, and we await the conclusion of the EU process.’

5. The proposed EU act would create a new category of micro and small primary operators from low-risk countries, which would be subject to reduced obligations. Is Northern Ireland considered ‘low risk’ under the proposal? How many NI businesses would fall into this new category?

Yes, Northern Ireland is classified as low risk by the European Commission, as per its published Country Classification list: Country Classification List - Green Forum - European Commission.

Defra have advised that *‘as the EU proposal has not yet been made into law, the UK Government awaits the outcome of the EU process to fully determine how many NI business fall into the new category of micro and small primary operators. Should the proposal be made into law, we understand that the UK will fall into the new ‘low risk’ category. The Government is working to clarify the approach to deforestation policy across the UK and will provide more detailed guidance for businesses as soon as possible.’*