

Retail and wholesale sector welcomes additional clarity, asks for timely publication of delegated regulation

Brussels – The European Commission published their evaluation report together with the updated guidance document and Frequently Asked Questions, as well as a draft delegated act. These publications were foreseen under the review that was concluded last year and aim to provide clarity on the practical implementation of the EU Deforestation Regulation (EUDR).

For Europe’s retail and wholesale sector, the guidance and FAQ and draft delegated act are of critical importance to reach a workable regulation, and on which we have provided our insights. The organisation, while appreciating the earlier review, which partly removed duplication of due diligence obligations, points to the substantial impact of the rules on retail and wholesale companies. Retailers and wholesalers trade many or all the products in scope, resulting in thousands of products, ranging from coffee to furniture, supplied by hundreds of supply chain partners, globally and in the EU. As such, the rules continue to require heavy investment, underpinning the need for clarity and sufficient time to prepare.

“Our sector fully supports the fight against deforestation,” stated Els Bedert, Director for Product Policy and Sustainability, “however, considering the impact on retailers and wholesalers - which are very different in set-up, product scope and range - clarity and practicability of the rules is indispensable to avoid trade disruption affecting supply chains. The documents published yesterday, while requiring further analysis, are a step in the right direction, such as how to know your position in the supply chain or the requirements for re-import and re-export. However, by proposing additional products in scope, more work is required with additional suppliers.”

EuroCommerce expects more questions will arise before and during implementation, including on the use of the information system. The organisation therefore calls on the Commission and member states to continue engaging with the retail and wholesale sector and ensure businesses are granted the necessary learning period focusing on guidance, clarification and advice, not punitive action.

EuroCommerce specifically asks the following three points:

- A timely publication of the draft delegated act by 30 June at the latest, allowing a minimum of 6 months to implement the necessary technical and operational traceability adaptations, including with suppliers.
- A fully functional TRACES system to allow smooth trade, with sufficient time and opportunities for training on its use.

- Coherent approach by Member States across the single market with sufficient support for business before and during implementation.

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EuroCommerce is the principal European organisation representing the retail and wholesale sector. It embraces national associations in 27 countries and 5 million companies, including leading global players and many small businesses. Over a billion times a day, retailers and wholesalers distribute goods and provide an essential service to millions of business and individual customers. The sector generates 1 in 7 jobs, offering a varied career to 26 million Europeans, many of them young people. It also supports millions of further jobs throughout the supply chain, from small local suppliers to international businesses. EuroCommerce is the recognised European social partner for the retail and wholesale sector.