



**Advanced Woody
Biomass Alliance**

EUDR Working Group Meeting

April 2nd, 2026

Agenda

1. Welcome and Anti-trust

2. Policy updates:

- a) Latest stakeholder positions on EUDR
- b) Updates from recent engagement on Annex I
- c) New Commission “understanding your position in supply chain” documents

3. Operational discussion:

- a) Member update

4. Update on outstanding actions:

- a) AG to draft letter to JRC on Forest Maps inaccuracies – on hold

5. AOB

AWBA Anti-trust Policy

We will conduct today's meeting in compliance with AWBA's Anti-trust Policy. According to this policy, we will not discuss pricing or price-fixing of pellets or any underlying wood pellet fiber. We will also not discuss anything that could be construed as a boycott.

If we hear the conversation move in this direction, we will quickly bring it back to the agenda. If anyone has any questions about AWBA's Anti-trust Compliance Policy, please do not hesitate to ask. Thank you.

AI Note Takers

We kindly ask all participants to refrain from using AI-powered note-taking tools (such as Otter.ai, Fireflies, and similar services)

Thank you!

Policy update: Latest stakeholder positions on EUDR

Germany and Austria call for further amendments

- The German Government have tabled proposals for further simplification:
 - Regional collective reports instead of individual geolocation declarations
 - Clarified and limited requirements for imports from low-risk countries
 - Limitation on the review of legality claims
 - More tools to ensure a uniform and low-bureaucracy implementation across the EU
 - Limiting the inspection, corrective measures and sanctions to the first placer on the market
 - Workable application of the 2025 simplifications
- Austrian Agriculture Minister states: “it is clear to me that further relief is needed for countries without deforestation risk”
- We are seeking a meeting with German authorities

US delegation lobbies the EU

- USDA and USTR officials have met with officials in Madrid, Rome, Berlin, Paris and Brussels to press for changes to EUDR
- US continues to argue for a fourth “no/negligible risk” category, which would remove geolocation and related requirements for US companies
- Delegation also challenged the benchmarking methodology, in light of updated FAO data placing the US above the low-risk threshold
- EU officials indicated that the recent trade statement (“United States poses negligible risk to global deforestation”) is not being considered as a basis for amending EUDR
- Proposal to introduce a fourth risk category were rejected due to concerns of an increased risk of circumvention

Policy update: Latest stakeholder positions on EUDR

Coalition of companies and eNGOs call for EUDR to remain closed

- A coalition of 31 organizations, including companies such as Nestlé and Danone, and eNGOs including Rainforest Alliance and Mighty Earth issued a public letter to the Commission
- Argues that significant investments in compliance systems have already been made in good faith
- Warns that reopening the regulation would put these investments at risk and undermine trust in the EU's regulatory framework
- States that remaining uncertainties should be addressed through further Guidance and FAQs
- Calls on the Commission not to reward companies that have delayed compliance

EU industry coalition submits recommendations on FAQs and Guidance

- EU coalition of 19 associations (forest products, agriculture, coffee, tyres) have submitted suggestions for updated FAQs and Guidance
- Majority focus on improving FAQs/Guidance to operationalize last year's amendments
- Some areas of interest for members:
 - Enhanced legal status of FAQs/Guidance
 - Explicit acceptance of polygons at either upper or lower boundaries of a single real-estate property
 - Enhanced role for certification schemes, removing the need to resubmit audited documentation
 - A harmonized approach across competent authorities for checks and assessments
 - Further simplified due diligence for landowners - use of a business address

Policy update: Recent engagement on Annex I

Current status

- Commission have confirmed that items will be added to and removed from Annex I, though only the addition of instant coffee and palm oil-based soap have been discussed
- A redrafted Annex I is to enter “inter-service consultation” imminently; an opportunity for all Departments to input/object
- Commission are drawing on previous consultation responses; a response was submitted at the time
- A new draft is expected in the final weeks of April with a four-week public consultation window
- We understand that Canada and New Zealand are also pushing for a ‘residues’ exemption

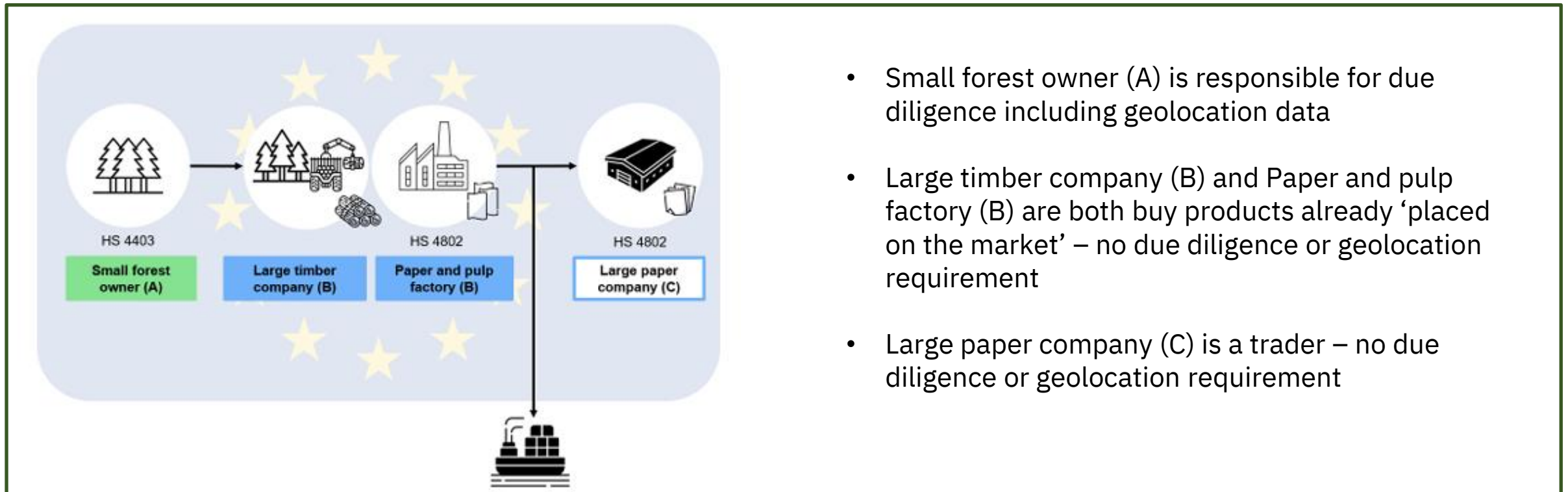
AWBA engagement

- Further meetings held with advisers to Commissioners with EUDR-related portfolios
- Strong support from both, they will take our position forward
- However, they experience similar challenges to our own with the Environment Department
- They advised us to:
 - Place greater emphasis on how exempting residues lowers burden on the IT system
 - Try to secure support from Socialist MEPs
 - Expand our position to ensure it is robust enough to avoid concerns about circumvention
- We are acting on all of these points and continuing broader outreach

Policy update: understanding your position in the supply chain

Commission publish updated 'understanding your position in the supply chain' info graphics

- Documents are informational only and make no changes to EUDR compliance
- Scenarios selected appear to focus on the simplest of supply chains
- No scenario for wood pellets, but analogous scenarios confirm 2025 amendments only benefit EU operators



- Small forest owner (A) is responsible for due diligence including geolocation data
- Large timber company (B) and Paper and pulp factory (B) are both buy products already 'placed on the market' – no due diligence or geolocation requirement
- Large paper company (C) is a trader – no due diligence or geolocation requirement

Operational Discussion: Member update

MEMBER UPDATE

Update on outstanding actions

- AG to draft letter to JRC on Forest Maps inaccuracies – on hold

AOB