Betreff: EU Deforestation Regulation - Position der Tensidindustrie

Sehr geehrter Herr …..**,**

im Namen des Verbands **TEGEWA e.V.** (VCI) möchten wir Ihnen unser Positionspapier zur geplanten Änderung der EU-Entwaldungsverordnung (EUDR) durch die EU-Kommission übermitteln. Darin legen wir unsere Bedenken dar und unterbreiten konkrete Änderungsvorschläge.

TEGEWA ist ein deutscher Fachverband, der die chemische Industrie im Bereich Prozess- und Performance-Chemikalien vertritt, einschließlich der Tensidhersteller. Das Positionspapier wurde gemeinsam mit dem europäischen Verband für Tensidhersteller **CESIO** (Cefic) sowie dem europäischen Verband für Oleochemikalien **APAG** (Cefic) erarbeitet.

Die Tensidindustrie ist besonders besorgt über

- die verzögerte Überarbeitung des Anwendungsbereichs (Anhang I) und
- die geringen Fortschritte bei der Lösung praktischer Herausforderungen, insbesondere bei Rückverfolgbarkeit und der Zusammenarbeit mit Indonesien.

Eine Verschiebung der Überprüfung von Anhang I auf das Jahr 2030 würde gravierende Folgen haben: Die europäische Produktion von Oleochemikalien und Tensiden könnte in andere Regionen abwandern, was den Verlust von rund **30.000 Arbeitsplätzen** in Europa sowie eine Rückkehr zu fossilen Alternativen nach sich ziehen würde.

Wir fordern daher:

1. **Eine sofortige „Stop-the-Clock"-Maßnahme**, d. h. eine einjährige Verschiebung der Anwendung der EUDR, um angesichts fehlender Leitlinien und aktueller Unklarheiten schwerwiegende Störungen der Lieferkette zu vermeiden.
2. **Abschluss der Überprüfung von Anhang I bis Juni 2026.**

Im Anhang finden Sie unser Positionspapier mit detaillierten Bedenken und konkreten Änderungsvorschlägen, um sicherzustellen, dass die EUDR ihre Ziele erreicht, ohne die biobasierte Wirtschaft Europas zu gefährden.

Mit freundlichen Grüßen

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Oleochemicals Europe

European Committee of Organic Surfactants and their intermediates

APAG & CESIO Statement on the EU Commission's proposal to amend the EU Deforestation Regulation (EUDR)

APAG and CESIO express their concern regarding the EU Commission's proposal to amend the EU Deforestation Regulation (EUDR). Particularly the delayed revision of the scope (Annex I review) and the limited progress in addressing the practical challenges surrounding traceability and engagement with Indonesia.

Legal restrictions in producing countries, such as Indonesia, prohibit the sharing of geolocation data, creating a barrier to tracking supply chains and meeting EUDR compliance requirements. Moreover, there is insufficient transparency surrounding ongoing discussions between the EU and producing countries. This lack of clarity raises concerns among stakeholders, weakens the credibility of the regulatory process, and risks halting palm oil imports into the EU market, thereby disrupting global supply chains and affecting industries and consumers across the Union.

Despite repeated engagement and constructive input from stakeholders, APAG and CESIO are concerned that the EU Commission will not be able to effectively resolve these traceability and data challenges in the coming months. This continuing uncertainty is undermining business confidence and long-term investment planning across the sectors. Failure to act swiftly risks far-reaching economic and industrial consequences.

Postponing the Annex I review to 2030 will lead to significant disruptions. European oleochemical and surfactant production will shift to other regions, which could result to the loss of ca. 30,000 European jobs and a reversion to fossil-based alternatives – which contradicts directly the objectives of the EU Green Deal and the EU Clean Industrial Deal. We therefore call for the review of Annex I to be finalised by June 2026.

Given the limited clarity and guidance, and to mitigate potential disruptions in supply chains, we recommend an immediate 'Stop-the-clock' for a one-year postponement of the EUDR's application.

With the forthcoming publication of the EU Bioeconomy Strategy only weeks away, this situation places at risk key bio-based sectors that provide essential building blocks for hundreds of products integral to everyday life in Europe.

APAG and CESIO ask the European Commission to take immediate, pragmatic action to ensure that the EUDR achieves its environmental objectives without undermining Europe's sustainable industries and bio-based economy.

APAG – Oleochemicals Europe represents a long-established sector of the European bioeconomy. Since the early 19th century, the oleochemical industry has been using rendered animal fats to manufacture bio-based products used for candles, paints, detergents, cosmetics, pharmaceuticals and many other applications.
Our industry continues to invest in sustainable technologies enabling the development of a circular bioeconomy: for instance, oleochemical products are used to de-ink used paper to enable recycling and to de-ice airplanes as an alternative to fossil-based materials.

For more information visit our website www.apag.eu or visit our LinkedIn page

CESIO (the European Committee of Organic Surfactants and their Intermediates) is an industry association that represents manufacturers and marketers in the European surfactants industry. CESIO contributes to better understanding of surfactants and the many ways in which they contribute to economic development and quality of life; and addresses specific issues relating to human health and the environment in order to sustain their beneficial contribution to society. Surfactants have a wide range of end-uses including in household detergents, personal care formulations, industrial and institutional washing and cleaning, as well as technical applications in textiles, leather and paper treatment, agrochemicals, the metal, mining and oil industries, and in plastics, lubricants, paints and coatings.

For more information visit our website www.cesio.eu

AMENDMENT 1:

Article 34

Review

1. ~~*The Commission may adopt delegated acts in accordance with Article 35 to amend Annex I with regard to the relevant CN codes of relevant products that contain, have been fed or have been made using relevant commodities.*~~

(1 new) By 30 June 2026, the Commission shall adopt a delegated act in accordance with Article 35 to amend Annex I with regard to the relevant CN codes of relevant products that contain, have been fed or have been made using relevant commodities.

Justification:

A timely revision of Annex I is needed in order to ensure a level playing field and minimise the impact on the European industry and production of goods.

AMENDMENT 2:

Article 38

Entry into force and date of application

1. This Regulation shall enter into force on the twentieth day following that of its publication in the *Official Journal of the European Union*.
2. Articles 3 to 13, Articles 20, 21, 23, 26, 31 and 32 shall apply from 30 December ~~*2025*~~ ***2026***.
3. ~~*For operators that by 31 December 2024 were established as micro-undertakings or small undertakings within the meaning of Article 3(1) or (2), first subparagraph, of Directive 2013/34/EU, irrespective of their legal form, the Articles referred to in paragraph 2 of this Article shall apply from 30 December 2026.*~~
4. ~~*For micro and small primary operators, the Articles referred to in paragraph 2 of this Article shall apply from 30 December 2026.*~~
5. Articles 16 to 19, Articles 22 and Article 24 shall apply from ~~*30 June*~~ ***30 December*** 2026 ~~*with regard to measures concerning operators, downstream operators and traders, and from 30 December 2026 to operators referred in paragraphs 3 and 4.*~~ Where a competent authority becomes or is made aware of non-compliance with Regulation (EU) 2023/1115 prior to the entry into application of Articles 16 to 19, Article 22 and Article 24, it may issue warnings to operators, downstream operators and traders, accompanied by recommendations to achieve compliance.

Justification:

An immediate 'Stop-the-Clock' of the EUDR implementation for all operators for minimum 1 year is necessary until genuine discussions on effective simplifications have been concluded.