POSITION PAPER

1 June 2026

JBCE POSITION PAPER ON THE TARGETED EXEMPTIONS AND CLARIFICATIONS OF PRODUCT SCOPE UNDER THE EU DEFORESTATION REGULATION

INTRODUCTION

The Japan Business Council in Europe (JBCE) welcomes the opportunity to comment on the European Commission's proposal regarding the product scope of the EU Deforestation Regulation (EUDR).[1] JBCE supports the European Union's objective of ensuring an effective and proportionate implementation of the EUDR, and has contributed throughout the discussions regarding its implementation and simplification measures. JBCE acknowledges the European Commission's regulatory simplification efforts in consideration of industrial stakeholders, such as the exemption of downstream operators and the exclusion of certain paper products, which effectively reduce the burden on economic operators.

In light of the publication of the draft delegated act revising Annex I of the EUDR, JBCE would like to convey the perspectives of its members regarding the scope of products covered by the EUDR and possible additional exclusions and simplification measures that would improve legal certainty, feasibility, and proportionality across supply chains.

KEY MESSAGES

JBCE calls for:

- **Exempting additional products from the scope of the EUDR**, as their inclusion would result in disproportionate compliance burdens and practical challenges, potentially undermining other policy objectives, such as circularity and consumer safety, without a commensurate contribution to preventing deforestation and forest degradation.
  - The following products should be exempted from the scope of the EUDR:
    - **Rubber Parts (containing negligible amounts of natural rubber)**
    - **Spare Parts**
    - **Replacement Packaging Materials**
    - **Information Materials**
- **Accepting the provision of alternative information,** such as the country of harvest and sub-national region, and giving **due consideration to established certifications** (e.g. PEFC, FSC), where more precise geolocation data cannot be obtained, particularly for paper products.

[1] Delegated regulation regarding the product scope of the EU Deforestation Regulation

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To ensure a proportionate and effective application scope, JBCE calls on the European Commission to make the following adjustments:

1. Proportionally adjusting the coverage of products containing rubber

Identifying whether a product contains natural rubber and tracing its origin is extremely challenging, due to the need to investigate across extensive and complex supply chains from downstream manufacturers. Importers struggle to collect the necessary due diligence documentation, such as declarations of conformity from suppliers, particularly given that certain suppliers are relatively small and medium-sized enterprises (SMEs) located outside of the European Union (EU).

When faced with traceability issues, it is difficult to make adjustments to supply chains swiftly, as the identification of alternative suppliers guaranteeing the same product features and quality can be a complex process that often requires a considerable amount of time.

Despite the complexity and cost of this endeavour, the contribution to preventing deforestation and forest degradation is substantially limited, given the negligible amount of natural rubber contained in such products.

- The range of rubber products covered by EUDR provisions should therefore be adjusted through additional exemptions based on the volume and weight of natural rubber per item placed on the EU market by an operator.

2. Excluding spare parts of products already placed on the EU market

Spare parts are essential to repair activities, product longevity, and the EU's circular economy objectives. However, many spare parts used in electrical and electronic equipment, machinery, and vehicles may contain only minimal quantities of natural rubber, with synthetic rubber as the dominant material. The natural rubber content is typically negligible in terms of weight and value.

Applying full due diligence requirements to such limited content would create a disproportionate compliance burden with minimal environmental benefit. It may also negatively affect the availability of spare parts, undermining repairability and product lifetime extension.

This issue is further amplified by the complexity of certain industries, such as the automotive sector, where spare parts may involve highly fragmented multi-tier supply chains, limited visibility over upstream material composition, and long-term service obligations extending over many years. This includes legacy service parts, which must be maintained and supplied for vehicles that may remain in operation for several decades after production has ended.

In such cases, ensuring full traceability of minimal material inputs is often not feasible in practice.

Moreover, import bans on or disruptions to the supply of spare parts caused by EUDR compliance challenges may delay or prevent the repair and maintenance of final products such as vehicles and machinery, thereby undermining product usability, longevity, and the safety of European consumers.

- Spare parts intended for repair and replacement purposes, including legacy service parts of products already placed on the EU market, should be excluded from the scope of EUDR requirements.

3. Exempting empty replacement packaging materials

Packaging materials for commodities such as electrical and electronic equipment are generally imported together with the products and are therefore outside the scope of the EUDR. However, standalone packaging imported solely to replace damaged original packaging is currently within the scope of the Regulation, despite being identical in function and nature to packaging already exempted when supplied with the product.

Given the very limited volumes involved and the negligible risk of deforestation, requiring full due diligence, including geolocation data, imposes a disproportionate administrative burden.

- In light of feasibility challenges and established customs practice, empty replacement packaging materials should therefore be excluded from the scope of the EUDR.

4. Excluding separately imported information materials

JBCE acknowledges EUDR amendments under Regulation (EU) 2025/2650, [2] which excludes products under ex CN Chapter 49 (printed books, newspapers, pictures and other products of the printing industry, manuscripts, typescripts and plans, of paper). This exclusion has contributed to reducing the burden for specific applications.

However, labels (ex CN Heading 4821, falling under Chapter 48) are still in the scope of the EUDR. In the case of globally standardised product designs, documents and labels required for circulation within the EU are sometimes affixed or packaged after the product is imported into the EU, as part of localisation activities.

- When imported separately for the purposes of affixing or packaging products already placed on the EU market, such items should also be excluded from the EUDR's scope,

[2] Regulation regarding certain obligations of operators and traders

considering the compliance cost and their negligible impact on deforestation or forest degradation.

5. Accepting the provision of alternative information and considering established certifications

Paper products are subject to significant compliance challenges under the EUDR, primarily due to the following reasons:

The paper supply chain is highly complex, involving multiple sourcing and processing steps. Wood from different forests is often mixed at the logging site, mixed at the pulp mill, and mixed again at the paper mill. A single sheet of paper can contain fibres from dozens or even hundreds of different trees from different locations. Pulp, the raw material for paper, is usually processed in large quantities. A mill may buy logs or recycled paper from several suppliers or regions. These are mixed during the pulping process, making it impossible to separate the fibres by origin later.

- Considering such difficulty, JBCE requests that, if geolocation information cannot be obtained through the supply chains, information on the country of harvest and sub-national region should be accepted as an alternative, as long as the risk of deforestation or forest degradation can be properly assessed by utilising all information available.
- In addition, JBCE calls for due consideration in the EUDR compliance assessment of products that have obtained internationally established certifications such as PEFC (Programme for the Endorsement of Forest Certification) and FSC (Forest Stewardship Council).

Conclusion

JBCE calls on the European Commission to make compliance with the EUDR more feasible in practice for economic operators by introducing the aforementioned adjustments to the scope and the implementation. Furthermore, amendments should introduce additional flexibility through allowing a single due diligence statement to cover multiple shipments or batches over one year, even where sourcing involves multiple suppliers and geolocations. This would better reflect operational realities and achieve further simplification, without undermining the objectives of the EUDR to prevent deforestation and forest degradation.

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ABOUT JBCE

Founded in 1999, the Japan Business Council in Europe (JBCE) is a leading European organisation representing the interests of over 110 multinational companies of Japanese parentage active in Europe. Our members operate across a wide range of sectors, including information and communication technology, electronics, chemicals, automotive, machinery, wholesale trade, precision instruments, pharmaceuticals, textiles, and glass products.

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