



Mr Eric Mamer,
on behalf of
Commissioner Jessika Roswall
DG Environment
Brussels
March 12, 2026

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Subject:

In response to your letter to Europaforum Northern Sweden regarding the EUDR and our second position paper on the EUDR, adopted on 19 June 2025.

Dear Mr Mamer,

Thank you for your letter responding on behalf of Commissioner Jessika Roswall. We greatly appreciate the ongoing dialogue on this important act, and the time you have taken to explain your perspective on the challenges, particularly considering the amendments and clarifications made to the regulation.

Europaforum Northern Sweden notes that the European Commission has made efforts to improve the deforestation regulation following the foreseen challenges, especially regarding increased bureaucracy and liability affecting operators. However, we would like to emphasize that many challenges remain, and the EUDR is, compared to the current situation, still a complication for millions of small forest holders in the European Union and elsewhere.

Wood products do not drive deforestation and should be excluded from the deforestation regulation.

EFNS suggests that wood products be excluded from the regulation. Forestry does not entail land-use change and does not drive deforestation. The geopolitical situation has changed rapidly, leading to an increased focus on preparedness and self-sufficiency. This has resulted in a growing need for a wide range of products within forest-based value chains, such as domestic renewable construction materials, hygiene products, fuels, and chemicals. It is therefore even more important that wood be excluded from the regulation.

The deforestation regulation is a barrier to food production in northern Sweden

Deforestation must be permitted where the purpose is to restore pastureland, arable land, or facilities for livestock and dairy production in countries and regions where there is no risk

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of deforestation. In its current form, the deforestation regulation makes it more difficult to sustain food production in northern Sweden and undermines the region's food security. Only around one per cent of the land is arable, and grazing livestock is the most common

means of creating and maintaining agricultural land. As requirements for preparedness and domestic food production increase, the regulation's prohibition on converting forest land into agricultural land becomes a direct obstacle.

The deforestation regulation runs counter to the objectives of the bioeconomy strategy

EFNS is of the view that the deforestation regulation in its current form contradicts the objectives of the European Commission's bioeconomy strategy and risks weakening European competitiveness. We therefore urge the Commission to implement the necessary changes to the regulation with a clear focus on competitiveness. The European Commission's bioeconomy strategy, presented at the end of 2025, is extensive and welcome. It places strong emphasis on strengthening the competitiveness of the European bioeconomy, a goal shared by Sweden and northern Europe. At the same time, Swedish forest industries have made clear that the deforestation regulation is already producing negative consequences for both forestry and the downstream industries that are central to Europe's bioeconomy. From our perspective, the regulation is therefore in direct conflict with the intentions of the bioeconomy strategy.

We look forward to continuing our dialogue with you on the deforestation regulation and other issues of importance to northern Sweden.

Kind regards,

Jonas Andersson
Regional Commissioner and Chair for the NSPA

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