



**KARADENİZ İHRACATÇI BİRLİKLERİ
GENEL SEKRETERLİĞİ**

Sayı : 35649853-TİM.KİB.GSK.UYG.2025/1097-2360

Giresun, 29/07/2025

Konu : Ormansızlaşmanın Önlenmesi Tüzüğü

E-POSTA

**KARADENİZ İHRACATÇI BİRLİKLERİ ÜYELERİNE SİRKÜLER
2025/423**

İlgi: 01/05/2025 tarih 258 sayılı sirkülerimiz.

Sayın üyemiz,

Bilindiği üzere, AB'nin Ormansızlaşmanın Önlenmesi Tüzüğü (European Union Deforestation Regulation-EUDR) kapsamında, mevzuatın uygulanmasını kolaylaştırmak ve sadeleştirilmek amacıyla 15 Nisan 2025 tarihinde yeni bir Rehber Belge (Ek 1) ve güncellenen Sıkça Sorulan Sorular (Ek 2) belgesinin yayınlandığı, 2025 yılı sonunda yürürlüğe girecek olan Tüzük öncesinde, uluslararası ortaklarından ve Avrupalı sektör temsilcilerinden gelen geri bildirimler çerçevesinde hazırlanan öneriyle, mevzuattaki bazı noktalara açıklık getirilmesinin, uygulamanın netleştirilmesinin ve idari yükün azaltılmasının amaçlandığı ilgede kayıtlı sirkülerimiz ile duyurulmuştur.

Bu defa, Ticaret Bakanlığının bir yazısına atfen, Türkiye İhracatçılar Meclisinden alınan 24/07/2025 tarih 120-1941 sayılı yazıda;

Avrupa Parlamentosu'nda (AP) 9 Temmuz 2025 tarihinde, Avrupa Komisyonu'nun ormansızlaşma riski taşıyan ülkeleri sınıflandırma önerisine yönelik itiraz kararı 373 lehte ve 289 aleyhte oyla kabul edildiği, EPP (Avrupa Halkları Partisi) Grubu'nun öncülüğünde oluşturulan itiraz, güncel olmayan verilere dayanması, şeffaflık eksikliği ve yalnızca ormansızlaşmaya odaklanıp orman tahribatını göz ardı eden hatalı bir karşılaştırma sistemi olmasına dayandırılmakta olduğu,

EPP tarafından yapılan açıklamada, Komisyon'un listesinin ülkelerdeki durumu yanlış yansıttığı; çiftçiler, ormancılar ve sanayi üzerinde gereksiz yük oluşturulduğu; bazı ülkelerin risk oranının göz ardı edilebilir olması sebebiyle orman alanları genişleyen ya da sabit kalan ülkeler için yeni bir 'risksiz ülke' kategorisi oluşturulması gerektiği; böylelikle düzenlemenin daha adil ve etkili hale geleceği hususlarının vurgulandığı,

Öte yandan, aynı hafta EUDR düzenlemesinin sadeleştirilmesine yönelik olarak üye ülkeler ve AB sektör kuruluşlarınca talepler açıklanması dikkat çekildiği, bu kapsamda, 7 Temmuz 2025 tarihinde, Avusturya, Bulgaristan, Hırvatistan, Çekya, Estonya, Finlandiya,

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Macaristan, İrlanda, İtalya, Letonya, Litvanya, Lüksemburg, Polonya, Portekiz, Romanya, Slovakya, Slovenya ve İsveç Tarım Bakanları tarafından Komisyon'a hitaben ortak bir mektup iletildiği,

Bahse konu mektupta, düzenlemenin mevcut haliyle, etkin orman koruma yasalarına sahip ve ormansızlaşma riski ihmal edilebilir düzeyde olan ülkeleri yeterince dikkate almadığı ve bu ülkelere orantısız bürokratik yükümlülükler getirdiği; bu durumunda rekabet gücünü zayıflatarak, özellikle biyoekonomi ve hayvancılık gibi sektörlerde olumsuz etkilere yol açacağı; karmaşık yükümlülüklerin hammadde fiyatlarını artırarak üretim maliyetlerini yükselteceği ve üreticilerin AB dışına taşınmasına neden olabileceği; ayrıca ürünlerin tam izlenebilirliğinin ise tam olarak mümkün görülmediği, bu nedenle, Komisyon'un sadeleştirme çalışmalarına EUDR'ın ivedilikle dahil edilmesi ve bu gerçekleşene kadar düzenlemenin uygulama tarihinin tekrar ertelenmesinin önerildiği,

Benzer şekilde, 8 Temmuz 2025 tarihinde, 16 tarım sektörü kuruluşunun, EUDR'ın sadeleştirilmesine yönelik ortak bir açıklama yayınladığı, bu kapsamda, EUDR'ın orantılılık ilkesine dair endişeler bulunduğu; hedeflenmiş, risk temelli ve uygulanabilir bir yaklaşımın benimsenmesi gerektiği; Komisyonun rehber belgeler ve Sıkça Sorulan Sorular dokümanlarıyla düzenlemeyi açıklama çabaları takdir edilmekle birlikte, bu belgelerin yetersiz kaldığı ve yasal bağlayıcılığı bulunmadığı,

Bu çerçevede, sadeleştirmenin ancak düzenlemeye yapılacak yasal değişikliklerle mümkün olacağı; Komisyon'un 2025 Çalışma Programı kapsamında sadeleştirme taahhüdü ve Omnibus yasa paketlerinin bu açıdan önemli bir fırsat olabileceğini belirtilmekte olup, konuya ilişkin mektuplar ilişik bulunmaktadır.

Bilgilerinize sunarız.

e-imzalıdır
Sertaç Ş. TORAMANOĞLU
Genel Sekreter

EKLER:

Ek-I: Ortak Mektup (3 Sayfa)

Ek-II: Ortak Açıklama (3 Sayfa)

JOINT LETTER OF THE MINISTERS OF AGRICULTURE

TOWARDS A FURTHER SIMPLIFICATION of the EU DEFORESTATION REGULATION

The Ministers of Austria, Bulgaria, Croatia, Czech Republic, Estonia, Finland, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Poland, Portugal, Romania, Slovakia, Slovenia and Sweden

Sustainable forest management is fundamental to develop climate-resilient forests, ensure species diversity and enhance bioeconomy with multiple products and services. Thanks to the relentless work in the Member States, the area covered by forests and wooded areas in Europe increased in recent decades. Regulation (EU) 2023/1115 is designed to contribute to reducing greenhouse gas emissions and global biodiversity loss by minimising deforestation and forest degradation worldwide.

The Regulation constitutes a milestone in global forest protection by providing a robust legal foundation for EU action against deforestation, while also strengthening international cooperation and including support measures for small producers in third countries.

However, the regulation in its current form does not sufficiently take into account countries with effective forest protection laws and a negligible risk of deforestation. Instead of targeting deforestation where the risk is highest, the regulation imposes disproportionate bureaucratic obligations on countries, where deforestation is demonstrably insignificant.

The Commission placed competitiveness at the heart of its general and economic agenda and engaged in ensuring that European businesses can thrive in the global marketplace and deliver sustainable prosperity for all people in the EU. Thus, given the considerable complexity of the Regulation's provisions, and in order to enable farmers, forest owners, operators, in other words – the entire value chain in the EU market - and competent authorities to meet their obligations, the Commission proposed postponing the date of application of the Regulation until 30 December 2025. This proposal was adopted by the co-legislators in December 2024, accompanied by a statement from the Commission attesting to its commitment to reducing the burden on businesses by eliminating unnecessary administrative burdens. Guidelines for simplifying and reducing the administrative burden were adopted by the European Commission in April 2025.

Nevertheless, the requirements imposed on farmers, forest owners and operators remain onerous and not justified for countries with an insignificant risk of deforestation. They are disproportionate to the objective of the regulation, which is to prevent deforestation where it occurs. Furthermore, they create additional costs both for companies and administrations, thus undermining the overall objective to (i) enhance competitiveness, not just in the bioeconomy sector but also across a range of other sectors, including the livestock sector, and (ii) adapt forests to climate change through active sustainable forest management. Moreover, there will be a concrete risk that increased raw material prices - caused by the complicated EUDR obligations required - will consequently lead

to increasing production costs and prices with the associated risk that our producers are relocating their production outside the European Union.

It should also be further noted that the full traceability within the EU-market required for all commodities by the Regulation will be extremely difficult, if not impossible for some of them.

Excessive and redundant due diligence requirements should be removed in countries where agricultural expansion is not significantly reducing the forest area. In countries which have been designated as being at low risk of deforestation, it should be accepted that existing national systems are sufficiently robust to demonstrate that compliance with EUDR can be properly controlled.

For example, it is essential that requirements be simplified for commodities and products already placed on the Union market as well as for farmers and foresters in countries or regions showing an insignificant risk of deforestation. Furthermore, there is a compelling case to facilitate better integration of existing national forest datasets of Member States with the Commission information system.

In the context of a general desire to simplify EU regulations, we reiterate that many Member States have already expressed the strong need of a more substantial reduction of the administrative burden associated with Regulation (EU) 2023/1115 on deforestation. Under the any other business point from AT and LU discussed during the May AGRIFISH Council, 18 Member States have supported further simplification.

We therefore urge the European Commission to swiftly include the Deforestation Regulation in its simplification plans in order to ensure coordinated and effective implementation of the EUDR across the EU. Pending the Commission's simplification proposals, it might be advisable to further postpone the date of application of the regulation.

Norbert Totschnig

Austrian Federal Minister for Agriculture, Forestry, Climate and Environmental Protection, Regions and Water Management

David Vljacic

Croatian Deputy Prime Minister and Minister for Agriculture, Forestry and Fisheries

Hendrik Johannes Terras

Estonian Minister for Regional Affairs and Agriculture

Istvan Nagy

Hungarian Minister for Agriculture

Francesco Lollobrigida

Italian Minister for Agriculture, Food Sovereignty and Forestry

Ignas Hofmanas

Lithuanian Minister for Agriculture

Georgi Tahov, PhD

Bulgarian Minister for Agriculture and Food

Marek Věborný

Czech Minister for Agriculture

Sari Essayah

Finnish Minister of Agriculture and Forestry

Martin Heydon

Irish Minister for Agriculture, Food and the Marine

Armands Krauze

Latvian Minister for Agriculture

Martine Hansen

Luxembourg Minister for Agriculture, Food and Viticulture

Paulina Hennig-Kloska
Polish Minister of Climate and Environment

José Manuel Fernandes
Portuguese Minister for Agriculture and Sea

Florin Ionut Barbu
Romanian Minister for Agriculture and Rural
Development

Mateja Calusic
Slovenian Minister for Agriculture, Forestry
and Food

Richard Takáč
Slovak Minister for Agriculture and Rural
Development

Peter Kullgren
Swedish Minister of Rural Affairs

In copy:

Christophe Hansen Commissioner for Agriculture and Food
Jessika Roswall Commissioner for Environment, Water Resilience and
a Competitive Circular Economy

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08/07/2025

Joint Statement

Urgent need to include EU deforestation regulation in the Commission simplification proposals

Our organisations welcomed the decision in December 2024 to extend the implementation start of the EU Deforestation Regulation (EUDR). At the same time, we reiterated our longstanding call to shift the focus towards meaningful simplification. This call is linked to our concerns about the Regulation's practical applicability, its lack of proportionality, the substantial administrative burden it imposes and the legal uncertainties and diversion of commodity flows that are likely to be generated. These issues are also increasingly recognised by Members of the European Parliament and Agriculture Ministers, who have publicly called for substantial simplification and proportionate approach to EUDR's implementation.

In view of these concerns about the EUDR's proportionality, we stress the urgent need for a more targeted, risk-based, and practicable implementation of the EUDR, going beyond what is provided by the current Regulation.

Despite the European Commission's efforts to clarify the Regulation through Guidance and Frequently Asked Questions (FAQ) documents, these initiatives have not brought significant improvements to address our core concerns, although some clarifications provided are appreciated. Crucially, these documents carry no legal weight, and they are subject to diverging interpretations in different Member States. Therefore, 'simplification' should be made directly through amendments to the Regulation.

We acknowledge the Commission's stated commitment to simplification in its 2025 Work Programme, and in particular the potential of the upcoming Omnibus legislative packages. These initiatives present an opportunity that must not be missed. We therefore urge the Commission to include a comprehensive review of the EUDR as part of these simplification proposals.



Copa - Cogeca | European Farmers European Agri-Cooperatives

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We remain fully committed to engaging in constructive dialogue and stand ready to contribute to a regulatory process that enables the EUDR to achieve its environmental goals without jeopardising the viability of responsible operators across the supply chain.

On behalf of the following organisations:

APAG - Oleochemicals Europe

Bioenergy Europe - European Bioenergy Association

CEI-Bois – European Confederation of Woodworking Industries

CEPF – Confederation of European Forest Owners

COCERAL - European association of trade in cereals, oilseeds, rice, pulses, olive oil, oils and fats, animal feed and agro-supply

Copa-Cogeca – European Farmers and Agri-Cooperatives

COTANGE- Confederation of National Associations of Tanners and Dressers of the European Community

EFIC – European Furniture Industries Confederation

ELO – European Landowners' Organization

EOS – European Organisation of the Sawmill Industry

EPF – European Panel Federation

EPLF - European Producers of Laminate Flooring

FECOF - European Federation of Forest Municipalities

FEFAC – European Feed Manufacturers' Federation

FEP - European Parquet Federation

UECBV - European Livestock and Meat Trading Union

-END-

About us - Copa and Cogeca are the united voice of farmers and agri-cooperatives in the EU. Together, we ensure that EU agriculture is sustainable, innovative and competitive, while guaranteeing food security for 500 million people throughout Europe. >>> More information www.copa-cogeca.eu



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