

October 2024

EARSC Statement on the Proposed Delay of EUDR Implementation

The European Association of Remote Sensing Companies (<u>EARSC</u>) is a trade association representing over 135 members across Europe in the Earth Observation (EO) industry. EARSC acknowledges the European Commission's recent proposal regarding the EU Deforestation Regulation (EUDR) implementation timeline.

While we appreciate the complexities involved, we respectfully express our concerns about this decision. Europe has demonstrated unprecedented leadership in combating global deforestation, and we are proud of the EU's commitment to addressing the environmental impact of our consumption. The EUDR represents a crucial step towards achieving global climate and sustainable development goals, particularly given that deforestation and forest degradation are the second-largest source of greenhouse gas emissions worldwide.

The EUDR is a well-structured and impactful regulation, and all the necessary elements for its successful implementation are already in place. We believe it remains crucial to maintain the integrity of the regulation as it currently stands, ensuring its full potential is realised once enforcement begins.

Europe's Earth Observation Sector is Ready to Support the EUDR

The Earth Observation industry in Europe has responded rapidly and proactively to the EUDR's demands. As highlighted by the European Commission's own <u>press release of October 2nd</u>, the technical tools necessary for the regulation's successful implementation are ready.

Our sector has worked diligently to ensure that effective solutions to provide the monitoring, reporting and verification services are available to meet the regulation's requirements. EARSC previously prepared and submitted the "Earth Observation Technological Feasibility Assessment for Real-Time Global Deforestation Information" demonstrating how the sector's capabilities and solutions can respond to the regulation requirements. EARSC strongly encourages all stakeholders in the supply chain to utilise the existing, validated tools that ensure compliance feasibility. These EO driven solutions offer a robust, reliable, and scalable method to monitor deforestation and ensure compliance which is also crucial for immediate action against deforestation. As such, we respectfully urge the European Commission, the European Parliament, and the Council to reconsider the proposed delay.

Delays Undermine European Leadership on Environmental Protection

Swift and timely implementation of the EUDR would reinforce Europe's global leadership in environmental protection and support the innovative technologies developed by European companies to address this critical issue. There is no technical reason to justify delaying the regulation's enforcement. Setting back the enforcement date would send a detrimental message not only to all stakeholders in the commodities sector, both European and non-European, but also to other international partners. A complete delay, therefore, cannot be justified given the urgency of the crisis and the pivotal role that the EUDR plays in mitigating deforestation.





Call to Action for EUDR Implementation

EARSC calls upon the European Commission, the European Parliament and the Council to reconsider this proposed delay and to proceed with the EUDR implementation employing a "soft implementation phase", i.e., keeping reporting requirements intact but delaying financial penalties, ensuring progress and compliance readiness for EUDR. Delaying the essential regulation would not only hinder Europe's environmental progress but slow the momentum of the innovative European EO services industry who has done its part to ensure that the tools and technologies needed for compliance are ready. A softer implementation approach will allow stakeholders to continue refining operational solutions, many of which are already being successfully implemented by leading companies demonstrating compliance. By utilising this time effectively, we can ensure these solutions become accessible to a wider audience and foster a smoother transition toward full compliance, aligned with the regulation's mid-term goals.

EARSC remains committed to supporting the objectives of the EUDR and stands ready to assist all stakeholders in its effective implementation.